

Stephen Richardson

From: Janine Goodwin <Janine.Goodwin@epa.nsw.gov.au>
Sent: Friday, 7 August 2020 11:26 AM
To: Stephen Richardson; EPA RSD Queanbeyan Mailbox
Cc: Brian Hanley; john.studdert@manildra.com.au; David Johnston; Amanda Fletcher; Shaun Williams
Subject: RE: Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Modifications to Existing Ethanol Distillery, Shoalhaven

Dear Stephen

Thank you for your email 6 August seeking comments from the EPA. My understanding from our telephone conversation was that given the time lapsed, and that the mod application was going to be lodged with Planning shortly, that you no longer required a submission from the EPA. I apologise that this was obviously not your take away from the conversation, and hope this hasn't caused unnecessary delays.

At this stage, the EPA does not have any specific comments in relation to the draft proposal.

The EPA advises that the application will need to assess the proposed changes to any infrastructure and processes at the premises, and identify potential impacts on expected pollution emissions from these modifications. Any identified impacts that may result in changes to current pollutant emissions from the premises will need to be adequately evaluated against appropriate legislative requirements and government guidelines.

Regards
Janine

From: Stephen Richardson <steve@cowmanstoddart.com.au>
Sent: Thursday, 6 August 2020 3:27 PM
To: Janine Goodwin <Janine.Goodwin@epa.nsw.gov.au>; EPA RSD Queanbeyan Mailbox <Queanbeyan@epa.nsw.gov.au>
Cc: Brian Hanley <brian.hanley@manildra.com.au>; john.studdert@manildra.com.au; David Johnston <David.Johnston@manildra.com.au>
Subject: FW: Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Modifications to Existing Ethanol Distillery, Shoalhaven

Dear Janine,

I refer to my correspondence sent on the 15th June 2020 to the EPA in connection with the above matter, and our subsequent telephone discussion. I have not received anything from the EPA in relation to this matter, and following discussion with Shaun Williams from DPIE he indicates DPIE have not received anything either. Could you advise whether EPA wish to provide any comments in relation to this proposal?

Regards

Stephen Richardson RPIA
Cowman Stoddart Pty Ltd



COWMAN STODDART PTY LTD

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From: Stephen Richardson

Sent: Monday, 15 June 2020 3:50 PM

To: janine.goodwin@epa.nsw.gov.au; queanbeyan@epa.nsw.gov.au

Cc: Brian Hanley <brian.hanley@manildra.com.au>; john.studdert@manildra.com.au; David Johnston
<David.Johnston@manildra.com.au>

Subject: Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Modifications to Existing Ethanol Distillery, Shoalhaven

Dear Janine,

Shoalhaven Starches intend to undertake modifications to the existing Ethanol Distillery Plant located at their Bomaderry factory site to increase the proportion of 'beverage' grade ethanol that is able to be produced on the site. The modification will enable increased flexibility in terms of the range of types of ethanol produced at the site (i.e. between fuel, industrial, pharmaceutical and beverage grade ethanol) to meet market demands.

The proposed modification will enable an increase in capacity of the plant to produce an additional 100 ML per year of beverage grade ethanol. The proposal will **not** however involve an increase in the overall ethanol production at the site above the current approved 300 ML per year.

The purpose of the attached submission and drawing is to consult with and provide the EPA with an opportunity to detail issues that it believes should be considered as part of any Modification Application that is to be submitted to the Department of Industry, Planning and Environment. The submission; outlines the proposed modification to the approved project; outlines issues that such a modified proposal will raise; and which should be addressed in any Modification Application. On behalf of the Manildra Group we seek any issues that the EPA considers should be considered as part of such a Modification Application.

I would appreciate it if you could arrange to supply any comments the EPA may have in relation to this proposal as soon as possible. If you require any further clarification in connection with this matter please do not hesitate to contact me.

Regards

Stephen Richardson RPIA
Cowman Stoddart Pty Ltd

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Stephen Richardson

From: David Zerafa <david.zerafa@dpie.nsw.gov.au>
Sent: Wednesday, 17 June 2020 6:32 PM
To: Stephen Richardson
Subject: RE: Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Modifications to Existing Ethanol Distillery, Shoalhaven

Hi Stephen.

I have considered your request regarding the proposed modification to MP06_0228 and associated plans you have provided.

I can advise that NRAR has no specific requirements for consideration for any modifications contained within the footprint of the existing Shoalhaven Starches complex as is the case in this proposal.

I can be contacted directly if any clarification is required.

Regards David

David Zerafa
Senior Water Regulation Officer
Natural Resources Access Regulator
Department of Planning, Industry & Environment

NSW Government Offices
5 O'Keefe Avenue, Nowra
PO Box 309 Nowra 2541
Phone (02) 4428 9142 / Mobile 0427 663187
Email: david.zerafa@dpie.nsw.gov.au
Website: <http://www.industry.nsw.gov.au/water>

From: Stephen Richardson <steve@cowmanstoddart.com.au>
Sent: Monday, 15 June 2020 4:03 PM
To: david.zerafa@nrar.nsw.gov.au
Cc: Brian Hanley <brian.hanley@manildra.com.au>; john.studdert@manildra.com.au; David Johnston <David.Johnston@manildra.com.au>
Subject: Proposed Modification Application to MP06_0228, Shoalhaven Starches Expansion Project, Modifications to Existing Ethanol Distillery, Shoalhaven

Dear David,

Shoalhaven Starches intend to undertake modifications to the existing Ethanol Distillery Plant located at their Bomaderry factory site to increase the proportion of 'beverage' grade ethanol that is able to be produced on the site. The modification will enable increased flexibility in terms of the range of types of ethanol produced at the site (i.e. between fuel, industrial, pharmaceutical and beverage grade ethanol) to meet market demands.

The proposed modification will enable an increase in capacity of the plant to produce an additional 100 ML per year of beverage grade ethanol. The proposal will **not** however involve an increase in the overall ethanol production at the site above the current approved 300 ML per year.

The purpose of the attached submission and drawing set is to consult with and provide the NRAR with an opportunity to detail issues that it believes should be considered as part of any Modification Application that is to be submitted to

the Department of Industry, Planning and Environment. The submission; outlines the proposed modification to the approved project; outlines issues that such a modified proposal will raise; and which should be addressed in any Modification Application. On behalf of the Manildra Group we seek any issues that NRAR considers should be considered as part of such a Modification Application.

I would appreciate it if you could arrange to supply any comments NRAR may have in relation to this proposal as soon as possible. If you require any further clarification in connection with this matter please do not hesitate to contact me.

Regards

Stephen Richardson RPIA
Cowman Stoddart Pty Ltd



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Australian Government
Department of Defence

Charles Mangion
Director Land Planning and Regulation
Brindabella Business Park (BP26-1-A052)
PO Box 7925
Department of Defence
CANBERRA BC ACT 2610

ID-EP-DLP&R/OUT/2020/BS12113333

Stephen Richardson
PO Box 738
NOWRA NSW 2541

Dear Stephen

**PROPOSED MODIFICATION APPLICATION TO MP06_0228, SHOALHAVEN
STARCHES EXPANSION PROJECT, MODIFICATIONS TO EXISTING ETHANOL
DISTILLERY, SHOALHAVEN STARCHES, BOLONG ROAD, BOMADERRY**

Thank you for referring the abovementioned proposal to the Department of Defence (Defence) for comment. The site is approximately 10.65 kilometres northeast of HMAS *Albatross* and has a natural ground level of approximately 4.00 metres Australian Height Datum (AHD). Defence understands the proposed development to be at 56.40 metres above ground level (AGL) which is 60.40 metres AHD. A crane is proposed to be used during construction that will extend to a maximum height of 84.00 metres AGL which is 88.00 metres AHD.

Defence is duly concerned to ensure its operations at HMAS *Albatross* are not constrained by incompatible development on surrounding land. The Obstacle Limitation Surface (OLS) assessment has determined that the proposed development will not infringe the OLS.

We request that HMAS *Albatross* be notified at commencement of construction and completion of construction to ensure that it is a known hazard from the outset. Correspondence is to be sent to david.anderson@defence.gov.au

The proposed development meets the requirement for reporting of tall structures. Defence therefore requests that the proponent provide Defence and Air Services Australia (ASA) with "as constructed" details for the facility. The details can be emailed to ASA at vod@airservicesaustralia.com.

Should you wish to discuss the content of this advice further, my point of contact is Adam Murray contactable at land.planning@defence.gov.au or by telephone on (02) 6266 8474.

Yours sincerely,

Charles.Mangion

Digitally signed by Charles.Mangion
Date: 2020.07.22 15:18:24 +10'00'

Charles Mangion
Director Land Planning & Regulation

22 July 2020