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Shoalhaven Starches  
36 Bolong Road  
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**Attention: Stephen Richardson and Peter O'Neill**

**Subject: Assessment of the Gluten Dryer 8 Modifications**

Dear Stephen and Peter,

Gluten Dryer 8 (GD8) was included in the following assessment:

Pinnacle Risk Management Pty Limited, *Revised Preliminary Hazard Analysis, Modification Application to Mp06-0228 Mod 16 & 17, Shoalhaven Starches Expansion Project, Proposed New Specialty Processing Facility, New Gluten Dryer and Other Associated Works at 22, 24 And 171 Bolong Road, Bomaderry, NSW, 28 July 2020.*

I understand that the following modifications are required for this Shoalhaven Starches project:

- The GD8 building needs to be fire separated from the Specialty Product Building. Under Mod 17, the GD8 building adjoined the Specialty Products Building. It is now proposed to set the GD8 Building 6 metres from the Specialty Product Building to provide sufficient fire separation under the BCA. This in effect shifts the building to the west. The separation of these buildings will also provide the benefit of allowing operational access to remove / install equipment for maintenance purposes;
- The internal dimensions of the building are proposed to be amended to accommodate paths of travel within the building to comply with the BCA, as well as improve operational manoeuvrability;
- Provide a stair tower adjacent to the western wall of the relocated GD8 building to provide compliant paths of travel under the BCA which has further added to the footprint of the proposal;
- To accommodate the shifting of the GD8 building footprint to the west, it is now proposed to demolish the Maintenance Building which the GD8 building was to originally adjoin under Mod 17; and
- The roof of the GD8 building has also been raised to provide a skillion roof to improve stormwater design to better meet BCA requirements.

The relocated GD8 building is shown on the layout drawing in Attachment 1.

I have reviewed these changes to determine if modification of the PHA is required.

Given my assessment on the proposed changes, I conclude the following:

- The overall process safety risk from the GD8 is the same as per the abovementioned PHA;
- The hazardous plant operation and safeguarding in the PHA remain unchanged; and
- The conclusions in the PHA are therefore unchanged, i.e. the proposed changes will still result in compliance with the DoP's risk criteria in HIPAP No. 4;

It is, of course, possible to update the PHA, however, the conclusions will not change.

Please review and let me know your comments.

Yours sincerely,



**Dean Shewring**  
**Principal Risk Consultant**



Attachment 1 - Layout Drawing Showing the Proposed Changes

