

Simone Arnold

From: John Studdert
Sent: Tuesday, 1 August 2023 3:14 PM
To: 'Amanda Fletcher'
Cc: Gavin Dostal; Janine Goodwin
Subject: RE: HPE CM: Shoalhaven Starches Wastewater Management Plan update

Hi Amanda,

Thanks for the feedback.

We will update the plan to address these comments.

Regards,
John

From: Amanda Fletcher <Amanda.Fletcher@epa.nsw.gov.au>
Sent: Tuesday, August 1, 2023 2:31 PM
To: John Studdert <John.Studdert@manildra.com.au>
Cc: Gavin Dostal <Gavin.Dostal@manildra.com.au>; Janine Goodwin <Janine.Goodwin@epa.nsw.gov.au>
Subject: RE: HPE CM: Shoalhaven Starches Wastewater Management Plan update

Hi John

The EPA does not review or comment on management plans, however if you have a specific question/s for the EPA in relation to the plans, we are happy to assist.

I've had a high level review of the management plan in accordance with the consent and Shoalhaven Starches' response to submissions to the former DECC's comments back in 2008, and I have the following suggestions:

- I note there are trigger levels for the wastewater and soils in section 6.3. It may be worth also including groundwater trigger levels in this section as well.
- Section 2.3 lists the actions that will be taken if there is a failure in the irrigation system. It may also be worth expanding this section to include if there is a failure in the WWTP itself.

Regards

Amanda

Amanda Fletcher
Operations Officer
Regulatory Operations – Regional South
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From: John Studdert <John.Studdert@manildra.com.au>

Sent: Wednesday, 12 July 2023 9:26 AM

To: Amanda Fletcher <Amanda.Fletcher@epa.nsw.gov.au>; Janine Goodwin <Janine.Goodwin@epa.nsw.gov.au>

Cc: Gavin Dostal <Gavin.Dostal@manildra.com.au>

Subject: HPE CM: Shoalhaven Starches Wastewater Management Plan update

Hi Amanda,

As discussed, we have undertaken an update to our Wastewater Management Plan (see attached), as per Condition 25 of Shoalhaven Starches Development Consent 06_0228, which states:

The Applicant shall prepare a Wastewater Management Plan for the development to the satisfaction of the Secretary. This plan must:

- a) be prepared in consultation with EPA and be submitted to the Secretary for approval within 12 months of this consent;*
- b) be prepared in accordance with DECC's Environmental Guidelines: Use of Effluent by Irrigation;*
- c) outline the location, design and management of the irrigation, crop and grazing system, including measures to minimise soil and groundwater degradation; and*
- d) include:*
 - baseline data on soil and groundwater quality and characteristics;*
 - wastewater and soil quality impact assessment criteria and the effluent treatment and irrigation system performance measures;*
 - details of the wastewater, soil, silage and groundwater monitoring program;*
 - procedures for the reporting the monitoring results against the criteria and to determine the annual site nutrient and analyte budgets and water balance;*
 - contingency measures to address exceedances, pollutant triggers and problems with the wastewater management systems; and*
 - a description how the effectiveness of actions would be monitored over time.*
- e) be updated to include the additional measures identified in the capacity assessment for MOD 16, including management of sludge inventory, increased alkalinity supplementation and a review of factory process efficiencies to identify and manage sources of hydraulic and organic load peaks.*

We are unable to provide a track changes copy of the updated plan as we have engaged a different consultant to prepare the plan (the previous authors are no longer available), however I have attached the previous approved plan for comparison.

Please advise if the EPA wishes to review and make comments on the updated plan.

Regards,

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