

Shoalhaven Starches Development Consent 06_0228 Independent Odour Audit 2024 - Response to Audit Recommendations

Table 1 – AUDIT NON-COMPLIANCES

Cond. No.	Condition and Requirement	Audit Report Non-compliances	Shoalhaven Starches (SS) Response	Timeframe	Status
23/24-NC-A	The Applicant shall conduct quarterly odour monitoring from the DDG exhaust stack and report the results in the independent odour audit required under Condition 5 of Schedule 3.	The quarterly and annual emission testing is summarised in Table 8. It is observed that EPA ID 46 (DDG Pellet Plant Stack) was only tested during Q3 of the audit period. During Q1, Q2 and Q4 alternative emissions at EPM116, EPM117 and DDG Cyclone Aspiration were measured as an alternative, but the measured flows during those tests only account for ~50 % of the flow measured during Q3.	The construction of the new Co-Generation Plant and DDG Dryer 5 in the immediate vicinity of EPA 46 sampling point has resulted in restricted access for the required Elevated Work Platform (EWP) meaning no sampling could take place. In the interim, odour samples were taken from the known major individual sources (3) that contribute to EPA 46 to provide an indicative measure of the odour concentration. Access has been better restored since construction has finished and an improved process implemented to ensure sampling is completed each quarter	Dec 2024	Complete. Sampling conducted in July-24 & Oct-24

Table 2 – AUDIT RECOMMENDATIONS

Audit Reference	Audit Report Recommendations	Shoalhaven Starches (SS) Response	Timeframe	Status
23/24-REC-A	Based upon the data presented in Table 5, the biofilters are not achieving the de facto 500 OU standard and are not achieving a satisfactory degree of odour control (measured as 8 % efficiency). It is acknowledged that Shoalhaven Starches have recently brought a third biofilter online (Biofilter C) to redistribute the flow to achieve the design capacity flow rate through all biofilters.	The new Biofilter C constructed in 2024 has doubled our current odour treatment capacity in this area. By spreading the incoming air flows over a significantly larger surface area it is anticipated to significantly improve biofilter performance. Initial rounds of post-commissioning testing and Quarter 1 results have indicated that destruction efficiency has increased to >90% across the average of the biofilters. Further results are required to verify the improvements.	May 2025	In progress. Biofilter C installed in May 2024
23/24-REC-B	With regard to flow measurements at EPA ID 8 the odour monitoring reports state: "Sampling was undertaken at the exit of the stack as it was the only accessible area for the samples to be taken. No temperature or flow rate readings could be taken due to access issues." Shoalhaven Starches have advised that access is limited due to the addition of a silencer on this discharge point for noise control purposes. It is recommended that the access restrictions to EPA ID 8 are resolved to enable compliant odour monitoring to be performed.	The exit for this stack was recently fitted with a replacement silencer to reduce noise coming from this source, as a result the existing sampling point can no longer provide sufficient access for flow rate readings. Investigation into the relocation of this sampling point was undertaken and no other suitable location was found that would comply, not compromise the silencer and be safe to access. Historical flowrates and fan design specs could be considered a reasonable indicator of flow rate from discharge point.	December 2024	Complete.
23/24-REC-C	It is recommended that the access limitations preventing EPA 46 (DDG Pellet Stack) is resolved to ensure that the emissions are available to be tested during the following testing periods.	The construction of the new Co-Generation Plant and DDG Dryer 5 in the immediate vicinity of EPA 46 sampling point has resulted in restricted access for the required EWP meaning no sampling could take place. Access has been better restored since construction has finished and an improved process implemented to ensure sampling is completed each quarter	December 2024	Complete. Access has been re-instated.