



Shoalhaven Starches Modifications 25 and 29

Construction Air Quality Management Plan

Manildra Group

15 July 2025

→ **The Power of Commitment**



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1. Introduction

GHD Pty Ltd (GHD) has been engaged by Shoalhaven Starches Pty Ltd (Manildra) to prepare a Construction Air Quality Management Plan (CAQMP) for the following proposed modifications:

- Modification 25 (MOD25): Rail line extension and extension to the Product Dryers 3 and 4.
- Modification 29 (MOD29): Installation of additional evaporators, and associated substations, and re-configuration of the approved biofilters

This CAQMP has been developed to satisfy the requirements of Schedule 3, Condition 8D and 8F of Shoalhaven Starches Expansion Development Consent 06_0228, approved by the NSW Department of Planning and Environment.

Condition 8D of the consent states:

Prior to the construction of MOD 29, the Applicant must prepare and implement a CAQMP. The CAQMP must:

- Be prepared by a suitably qualified and experienced person(s);*
- Include the mitigation measures nominated in the Air Quality Impact Assessment, prepared by GHD Group Pty Ltd, Date April 2024; and*
- Include site-specific, measurable and auditable key performance indicators to evaluate the implemented construction mitigation measures.*

Condition 8F of the consent states:

Prior to construction of MOD 25, the Applicant must:

- Prepare a CAQMP in accordance with condition 8D, including incorporation of the mitigation measures identified in MOD 25;*
- Not commence construction of the works described in MOD 25 until the CAQMP required under (a) has been submitted to the Planning Secretary; and*
- Implement the most recent version of the CAQMP submitted to the Planning Secretary for the duration of construction of the works described in MOD 25.*

This CAQMP has been prepared prior to the commencement of any site works to promote employment of best practices. References to where each relevant condition of consent has been addressed in this plan is shown in Table 1 below.

Table 1 *Conditions of consent*

Consent requirement	Section in Plan
Condition 8D	
(a) Be prepared by a suitably qualified and experienced person(s);	Evan Smith has 20 years relevant experience including over 10 years of undertaking air quality works for Shoalhaven Starches. Julia Potgieter has over 3 years of experience working in air quality impact assessment and management plans.
(b) Include the mitigation measures nominated in the Air Quality Impact Assessment, prepared by GHD Group Pty Ltd, Date April 2024; and	Section 4.2
(c) Include site-specific, measurable and auditable key performance indicators to evaluate the implemented construction mitigation measures.	Section 4.2
Condition 8F	

Consent requirement	Section in Plan
(a) Prepare a CAQMP in accordance with condition 8D, including incorporation of the mitigation measures identified in MOD 25	This report, section 4.2
(b) Not commence construction of the works described in MOD 25 until the CAQMP required under (a) has been submitted to the Planning Secretary; and	NA
(c) Implement the most recent version of the CAQMP submitted to the Planning Secretary for the duration of construction of the works described in MOD 25.	NA

This report: has been prepared by GHD for Manildra Group and may only be used and relied on by Manildra Group for the purpose agreed between GHD and Manildra Group as set out in section 1 of this report.

GHD otherwise disclaims responsibility to any person other than Manildra Group arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.

Accessibility of documents

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

2. Project description

Manildra operates the Shoalhaven Starches factory (the factory) at Bolong Road, Bomaderry, near Nowra, in NSW (the site). At the factory, flour and grains are processed to produce ethanol, starch, gluten, glucose and distiller's dried grain (DDG).

Manildra is the holder of Environment Protection Licence (EPL) number 883 issued by the New South Wales Environmental Protection Authority (NSW EPA).

Manildra seek to construct modifications to the factory (MOD25 and MOD29) and are required to prepare a CAQMP for these works. The proposed modifications for MOD25 involve:

- Extending their existing rail line that services the factory operations from its present terminus at the eastern boundary of Lot 1 DP544730 in an easterly direction across adjoining lands that formed part of the former Australian Paper Mill and which are now under the ownership of the Manildra Groupe of Companies; and
- Undertaking an extension to the Product Dryers 3 and 4 building located within the main factory site to enable the installation of starch grinding baghouses. The proposed starch grinding bag house is to be erected above the existing starch dryer building. This addition will have a height above ground level of 28.84 metres (the existing building has a height of 20.34 metres). The purpose of the starch grinding bag house is to improve the quality of the starch product. The current grinding system does not have the capacity to grind starch to a sufficient fineness to meet market requirements

The proposed modifications for MOD29 involve construction of the following additional plant and equipment:

- Water balance syrup recovery evaporator (MVR No. 4) and relocation of approved cooling towers in that location.
- Stillage evaporators (2 units), finisher, cooling towers, odour recovery scrubber, and associated stillage vessels and processing equipment.
- Re-configuration of the approved biofilters.

- Main distribution substation (x2)
- Substation (x2) and switch room

The primary pollutant of concern from the proposed works will be particulate matter (dust) from excavation works, construction works, and vehicle movements on unpaved surfaces.

Minor combustion emissions from operation of vehicles and plant equipment will occur however these are anticipated to be negligible in the context of the factory site and therefore have not been considered further in this CAQMP.

3. Legislative and policy context

The relevant legislation and guidance for the AQIA of the project are:

- *NSW Protection of the Environment Operations Act 1997* (POEO Act) – The POEO Act provides the statutory framework for managing pollution in NSW, including the procedures for issuing licences for environmental protection on aspects such as waste, air, water, and noise pollution control. The POEO Act requires that no occupier of any premises causes air pollution (including odour) through a failure to maintain or operate equipment or deal with materials in a proper and efficient manner. For point source emissions where no standard of concentration and/or rate has been set, and for non-point source emissions, the operator must also take all practicable means to minimise and prevent air pollution (sections 124, 125, 126 and 128 of the POEO Act). The POEO Act includes the concept of 'offensive odour' (section 129) and states it is an offence for scheduled activities to emit 'offensive odour', subject to limited defences.
- *NSW Protection of the Environment Operations (Clean Air) Regulation 2021* (POEO Clean Air Regulation) – The POEO Clean Air Regulation provides regulatory measures to control emissions from motor vehicles, fuels, and industry.
- *National Environment Protection Council (NEPC) National Environment Protection (Ambient Air Quality) Measure 2021* (the Air NEPM) – The National Environment Protection Council of Environmental Ministers, now the National Environment Protection Council (NEPC), set uniform national standards for ambient air quality. The document containing these standards is known as the Air NEPM, which also contains goals for the identified relevant pollutants inclusive of particulates and concentration limits, averaging periods, and number of allowed exceedances for each of the identified pollutants.
- *NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales 2022* (the Approved Methods) - The Approved Methods lists the statutory methods for modelling and assessing emissions of air pollutants from stationary sources in NSW. It considers the above-mentioned legislation and guidance to provide pollutant assessment criteria.
- *Work Health and Safety Act 2011 No 10* (WHS Act) – The WHS Act aims to provide a framework to secure the health and safety of workers and workplaces. The WHS Act approves Codes of Practice which provide detailed information on how standards required under WHS laws can be achieved. The WHS Codes of Practice relevant to this CAQMP include the following:
 - Code of Practice: Construction work (NSW Government, 2019)
 - Code of Practice: Excavation work (NSW Government, 2020)
 - Code of Practice: How to manage and control asbestos in the workplace (NSW Government, 2022)
 - Code of Practice: How to safely remove asbestos (NSW Government, 2022)
- *Environment Protection Licence (EPL)* – Manildra is the holder of EPL number 883 issued by the NSW EPA. The EPL states that all operations and activities occurring at the premises must be carried out in a manner that will minimise dust at the boundary of the premises.

3.1 Assessment criteria

Assessment criteria for the project was taken from the Approved Methods and are summarised in Table 2. The application of each impact assessment criteria is variable for each pollutant based on the following factors:

- **Averaging period** – the period over which modelled concentrations are averaged.
- **Statistic** – the statistic of the modelled concentrations. As an example for a 1-hour averaging period, the ‘maximum statistic’ would be the highest predicted value at any receptor for the entire modelling period. The 99.9th percentile statistic would be (approximately) the ninth highest hour in a one year modelling period.
- **Impact location** – the location at which the impacts are to be assessed. For some pollutants, impacts are assessable only at sensitive receptor locations, while some impacts are assessable at and beyond the boundary of the site. The criteria apply at ground level where receptors are likely to be exposed.
- **Impact type** – the type of impact assessed. For some pollutants, the impacts are assessable only for the project’s contribution to pollutant concentrations at the relevant impact location (referred to as ‘incremental impacts’). For other pollutants, the cumulative impact (which includes both the incremental concentration as well as the background concentration) is assessed.

Table 2 *Air quality impact assessment criteria*

Pollutant	Averaging period	Statistic	Impact location	Impact type	Criterion
TSP	Annual	Maximum	Sensitive receptor	Cumulative	90 µg/m ³
PM ₁₀	24 hours	Maximum	Sensitive receptor	Cumulative	50 µg/m ³
	Annual	Maximum	Sensitive receptor	Cumulative	25 µg/m ³
PM _{2.5}	24 hours	Maximum	Sensitive receptor	Cumulative	25 µg/m ³
	Annual	Maximum	Sensitive receptor	Cumulative	8 µg/m ³
Dust deposition	Annual	Maximum	Sensitive receptor	Incremental	2 g/m ² /month
	Annual	Maximum	Sensitive receptor	Cumulative	4 g /m ² /month

4. Construction methodology

4.1 Modification 25

It is understood that the proposed construction of the rail extension (MOD25) would be undertaken across two general stages:

- Preparatory earthworks – this would involve:
 - Excavation and relocation of spoil (estimated to be approximately 11,000 m³ of spoil based on the findings of a preliminary geotechnical assessment that indicated the need to excavate a length of 1,100 m long by 10 m wide to an average depth of 1 m.
 - Placement of structural fill and capping material to replace excavated spoil (approximately 11,000 m³)
 - Creation of a hard stand for rail wagon maintenance area
- Rail construction works – this would involve:
 - Laying of ballast
 - Placement of railway sleepers
 - Installation of rail track

A summary of the proposed construction plant/equipment and expected duration of works is provided in Table 3.

Table 3 *Summary of proposed rail extension construction works*

Construction stage	Plant and equipment	Expected duration
Preparatory earthworks	– 2 x Excavators – 2 x Front end loaders – 2 x Dump trucks – 4 x Road trucks – Water truck (used for dust mitigation) – Roller – Grader – Road trucks for material deliveries	– Excavation and relocation of spoil 2-3 weeks – Placement of structural fill and capping material 2-3 weeks – Creation of a hard stand for rail wagon maintenance area 2 weeks Stage duration: 6 – 8 weeks
Rail construction works	– 3 x Excavators – 3 x Front End Loaders – 3 x Dump trucks – Drott – Rollers – Watercarts (used for dust mitigation) – Jackson Tamper – Kershaw Regulator	Stage duration: 4 weeks
Construction of the rail extension		Total duration: 10 – 12 weeks

The indicative location of proposed construction works and location of nearest receptors are shown in Figure 1. A drawing set showing the location of the proposed rail extension in more detail is provided in Appendix A.

The Air Quality Assessment for MOD25 (GHD, 2022) indicated that the risk identified for earthworks activities was **Low Risk** while the risk identified for all other construction and track-out activities was **negligible** for all receptors. While risk identified was at most Low Risk, dust management strategies have been proposed to further reduce the potential for dust impacts, and to provide a pathway should dust impacts occur.

Excavation works and vehicle movements on unpaved roads are considered likely to have the highest emissions of dust during the construction period. Construction of the product dryer building extension will not include ground excavation and works will be undertaken within sealed road areas of the factory.



Figure 1 Indicative location of proposed construction works for MOD25

4.2 Modification 29

It is understood that the proposed construction of MOD29 would primarily consist of installation of pre-fabricated structures/equipment and would involve the following activities:

- Preparatory works:
 - Preparation of substation site for piling and installation of slab on ground
 - Installation of timber piles and concrete slab on ground
- Construction/installation works:
 - Installation of concrete tilt slab building
 - Construction/installation of substations and switchroom
 - Construction/installation of stillage evaporators (2 units), finisher, cooling towers and associated equipment
 - Relocation of the approved cooling towers
 - Reconfiguration of biofilter No. 3

The indicative construction footprint with a 250 metre buffer zone is shown in Figure 2. A drawing set showing the proposed modifications in more detail is provided in Appendix B.

The Air Quality Assessment for MOD29 (GHD, 2024) indicated that the risk identified for all construction and track-out activities was **negligible** for all receptors. While risk identified was at most negligible, dust management strategies have been proposed to further reduce the potential for dust impacts, and to provide a pathway should dust impacts occur.

Excavation works and vehicle movements on unpaved roads are considered likely to have the highest emissions of dust during the construction period.



Figure 2 Indicative location of proposed construction works for MOD29

5. Management measures

The main features of the dust management strategies are based on prevention, mitigation and rectification. The mitigation and rectification measures will be implemented as required and their exact details will be based on a case by case situation depending on the issue and technical solutions available at the time. The proposed management strategies are described in the following sections.

Receptors within 250 metres of the construction footprint have potential to be impacted by the construction works. These receptors have been identified for each modification as presented in Table 4.

Table 4 Receptors within 250 m of the construction footprint for each modification

Modification	Receptors
MOD25	– 280 Bolong Rd – 390 Bolong Rd
MOD29	– Boc Gases (Bolong Rd) (C01) – Trackside Takeaway (1/21 Bolong Rd) (C02) – Jim Freeman Plumbing & Southern Industrial Plumbing Group (27 Bolong Rd) (C03) – C & S Frew Fabrications (1/29 Bolong Rd) (C04) – Mobil (33 Bolong Rd) (C05) – Cleary Bros Bomaderry (34 Bolong Rd) (C06) – Poolside Shoalhaven (36 Bolong Rd) (C07)

5.1 Prevention measures

- Prepare dust management education material for inclusion in site inductions, training and daily toolbox meetings. Inform construction staff of activities likely to cause high dust emissions (as part of site inductions) and appropriate methods to mitigate dust emissions.
- Plan land vegetation clearing, earthworks, rehabilitation and construction activities to keep exposed areas to a minimum and schedule major dust generating activities to occur one at a time.
- Implement on site traffic and operational controls to prevent unnecessary dust generation from vehicle movements including sweeping access roads as required, inspect incoming trucks to ensure trucks transporting material are covered and that tailgates are firmly fixed, enforcing speed limits and operating wheel washing facilities at exits from unsealed roads for use during wet conditions.
- Do not undertake dust generating activities during adverse weather conditions when visible plumes of dust are observed to leave the facility boundary.
- Inform receptors within 250 metres of the proposed construction works (refer Table 4) and provide them with a number to contact during construction if they have any questions or complaints.
- Cover loads during transport to prevent loss of material during haulage.

Key performance indicators to evaluate the efficacy of the prevention measures include:

- The frequency and effectiveness of dust management education material being incorporated into site inductions and daily toolbox meetings
- The success in minimizing exposed areas through the scheduling of dust generating activities
- Adherence to traffic and operational controls reducing unnecessary dust from vehicle movements
- Compliance with speed limits and the use of wheel washing facilities
- The communication effectiveness with receptors within 250 metres (refer Table 4), ensuring they are informed and their concerns addressed promptly

Other indicators include the percentage of loads covered during transport and the avoidance of dust generating activities during adverse weather conditions

5.2 Mitigation measures

- Perform daily inspections for visible dust emissions along the site boundary of the facility (refer Section 6 for details).
- Use dust suppression techniques (such as watering via watering trucks or sprinkler systems) to maintain moist conditions on cleared or exposed areas, stockpile areas, unsealed roadways and high dust generating equipment.
- Undertake continuous visual monitoring of dust emissions.
- Reduce or stop construction works if dust plumes are observed travelling off site beyond the site boundary, particularly towards the receptors within 250 metres (refer Table 4).
- Retain as much vegetative screening between the facility and the nearest sensitive receptors as possible.

5.3 Rectification measures

- Record environmental complaints and maintain regular reviews and reporting of performance.
- Consider spraying dust suppressants on the soil/cover material stockpiles.
- Increase the amount of watering on stockpiles and water cart equipment for operational areas if required.
- Develop alternative operational methods to reduce dust generation.

6. Monitoring and evaluation

6.1 Monitoring overview

Air quality monitoring shall be undertaken as following:

- Continuously monitoring of excessive dust generation by staff during day-to-day activities. To be implemented by raising staff awareness of potential air quality impacts and educating staff on appropriate responses. This should be regarded as standard operating practice for all staff.
- Ad hoc monitoring investigation to be undertaken as required in response to a reason (e.g. complaint received, change of typical operating procedures or at the request of the site manager etc). This will involve a boundary survey to investigate and mitigate the responsible source(s) (refer Section 6.2).

6.2 Complaint-based monitoring

If any valid air quality complaints are received, or excessive dust is noticed at the site boundary, air quality checks by the Environmental Coordinator are required immediately including air quality checks at residential receiver locations to verify the complaint details where applicable. A boundary survey shall be undertaken to investigate and mitigate the responsible source(s).

6.3 Reporting

The impact of construction activities can be influenced by numerous factors such as weather conditions, activities undertaken on that day and equipment used onsite, which can contribute to an increase in dust emissions. Recording monitoring and inspection results as well as conditions which influence dust can help to assess if management measures are effective and help define corrective actions, if required.

Environmental reporting for all ad hoc investigations must include the following (at a minimum):

- Date, time and reason for the investigation.

- Outcomes of the investigation (e.g. source(s) identified as responsible for causing the disturbance and mitigation measure implemented).
- If initiated by a complaint, the following is required:
 - All complaints will be handled according to the Shoalhaven Starches Environmental Complaints Handling Procedure (see Appendix C)
 - Air quality checks by the Environmental Coordinator immediately, including air quality checks at residential receiver locations to verify the complaint details where applicable
 - All corrective and preventative actions implemented will be documented as per Shoalhaven Starches Corrective and Preventative Action Procedure (QMS-P-0130)
 - Details of the date and time the complaint was received and the date and time that the dust was observed.

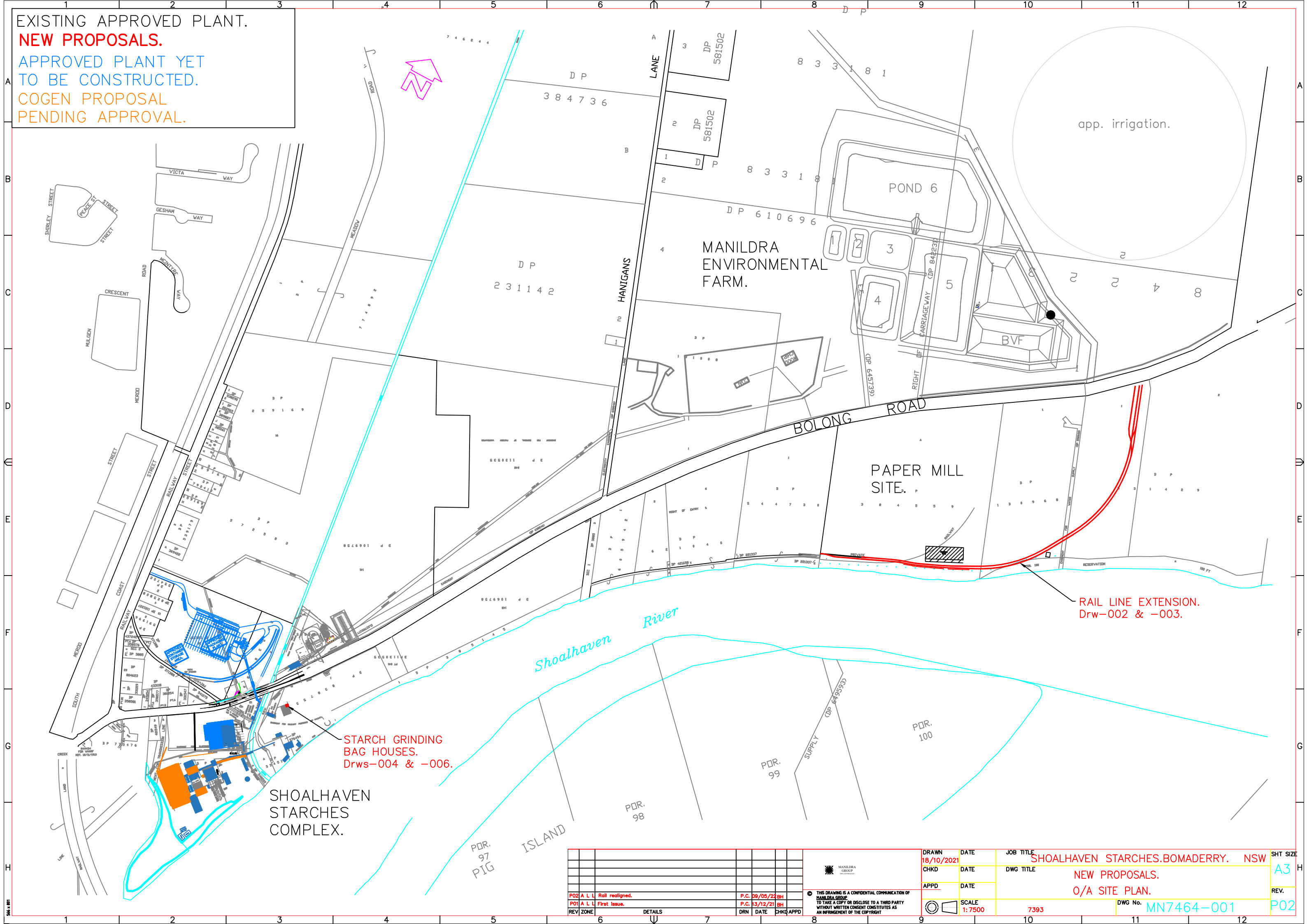
7. References

- GHD. (2022). *Shoalhaven Starches Modification 25 - Proposed Rail Line Extension and Additions to Product Dryer 3 & 4 Air Quality Assessment*.
- GHD. (2024). *Shoalhaven Starches Modification 29 - Air Quality Impact Assessment*.
- NSW Government. (2019). *Code of Practice: Construction Work*.
- NSW Government. (2020). *Code of Practice: Excavation Work*.
- NSW Government. (2022). *Code of Practice: How to manage and control asbestos in the workplace*.
- NSW Government. (2022). *Code of Practice: How to safely remove asbestos*.

Appendix A

**Modification 25 – Proposed rail extension
and dryers 3 & 4 baghouse drawing set**

EXISTING APPROVED PLANT.
NEW PROPOSALS.
APPROVED PLANT YET
TO BE CONSTRUCTED.
COGEN PROPOSAL
PENDING APPROVAL.

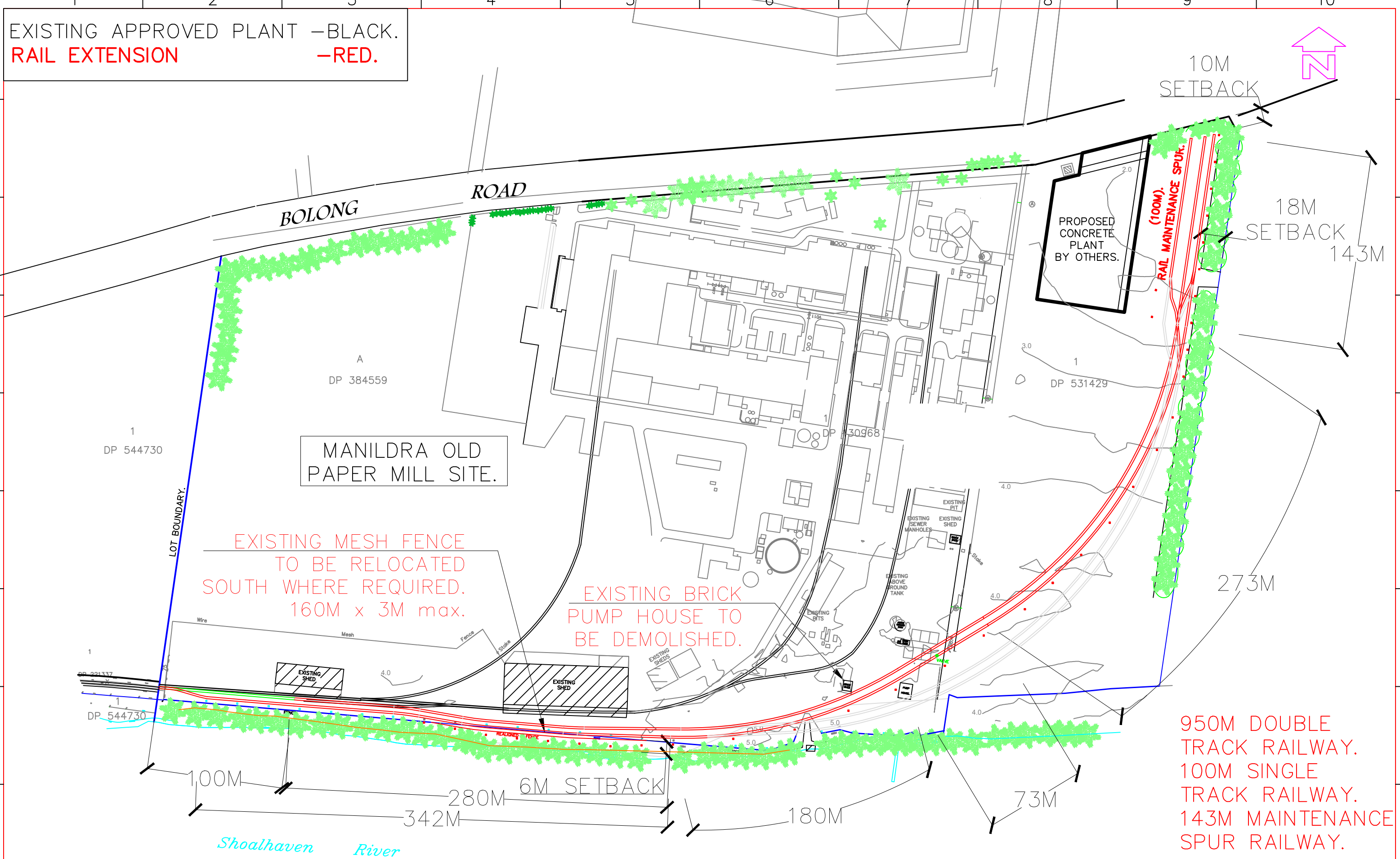


REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
P02	A L L	Rail realigned.	P.C.	08/05/24	BH	
P01	A L L	First Issue.	P.C.	15/12/21	BH	

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DRAWN	DATE	JOB TITLE	SHT SIZE
18/10/2021		SHOALHAVEN STARCHES.BOMADERRY. NSW	A3
CHKD	DATE	DWG TITLE	REV.
		NEW PROPOSALS.	
APPD	DATE	O/A SITE PLAN.	P02
SCALE	7393	DWG No.	MN7464-001
1:7500			

EXISTING APPROVED PLANT –BLACK.
RAIL EXTENSION –RED.



P14	ALL	Track reworked.	P.C.	9-05-22	B.H.	
P13	ALL	Track reworked.	P.C.	3-05-22	B.H.	
P12	ALL	Track reworked.	P.C.	21-04-22	B.H.	
P11	ALL	Wording amended.Track totals text reinstalled.	P.C.	4-04-22	B.H.	
P10	ALL	Existing fence highlighted.Contours shown.	P.C.	24-03-22	B.H.	
P09	ALL	Set back now shown from fence.	P.C.	23-03-22	B.H.	
REV	ZONE		DRN	DATE	CHKD	APPD

Commitment to Excellence

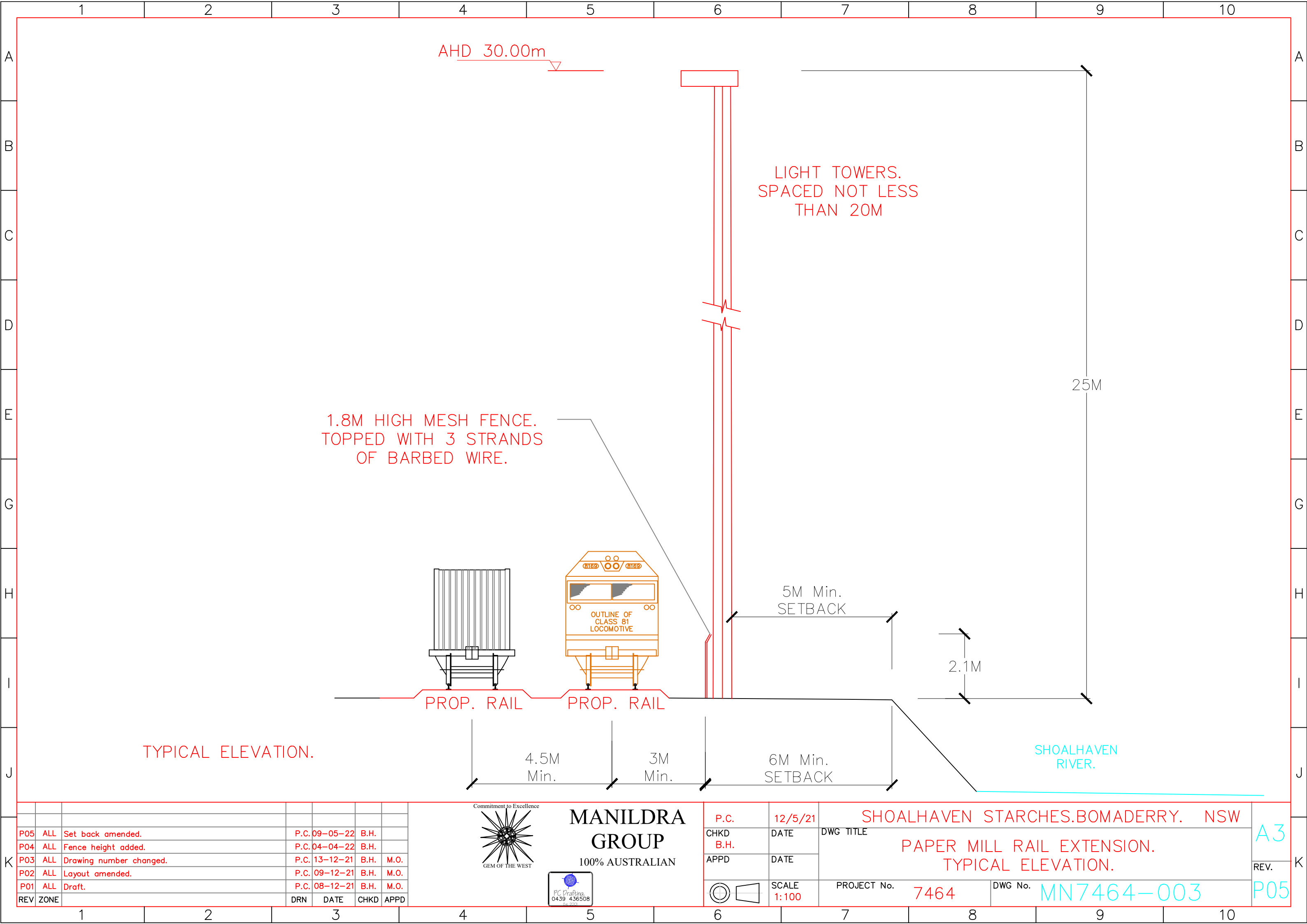
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GEM OF THE WEST

PC Drafting
0439 436508

P.C.	12/5/21	SHOALHAVEN STARCHES.BOMADERRY. NSW	A3
CHKD	DATE	DWG TITLE	
B.H.		PAPER MILL RAIL EXTENSION.	
APPD	DATE	SITE PLAN.	
SCALE	1:2500	PROJECT No.	7464
		DWG No.	MN7464-002
			P14



REV	ZONE	DRN	DATE	CHKD	APPD
P05	ALL		Set back amended.	P.C. 09-05-22	B.H.
P04	ALL		Fence height added.	P.C. 04-04-22	B.H.
P03	ALL		Drawing number changed.	P.C. 13-12-21	B.H. M.O.
P02	ALL		Layout amended.	P.C. 09-12-21	B.H. M.O.
P01	ALL		Draft.	P.C. 08-12-21	B.H. M.O.

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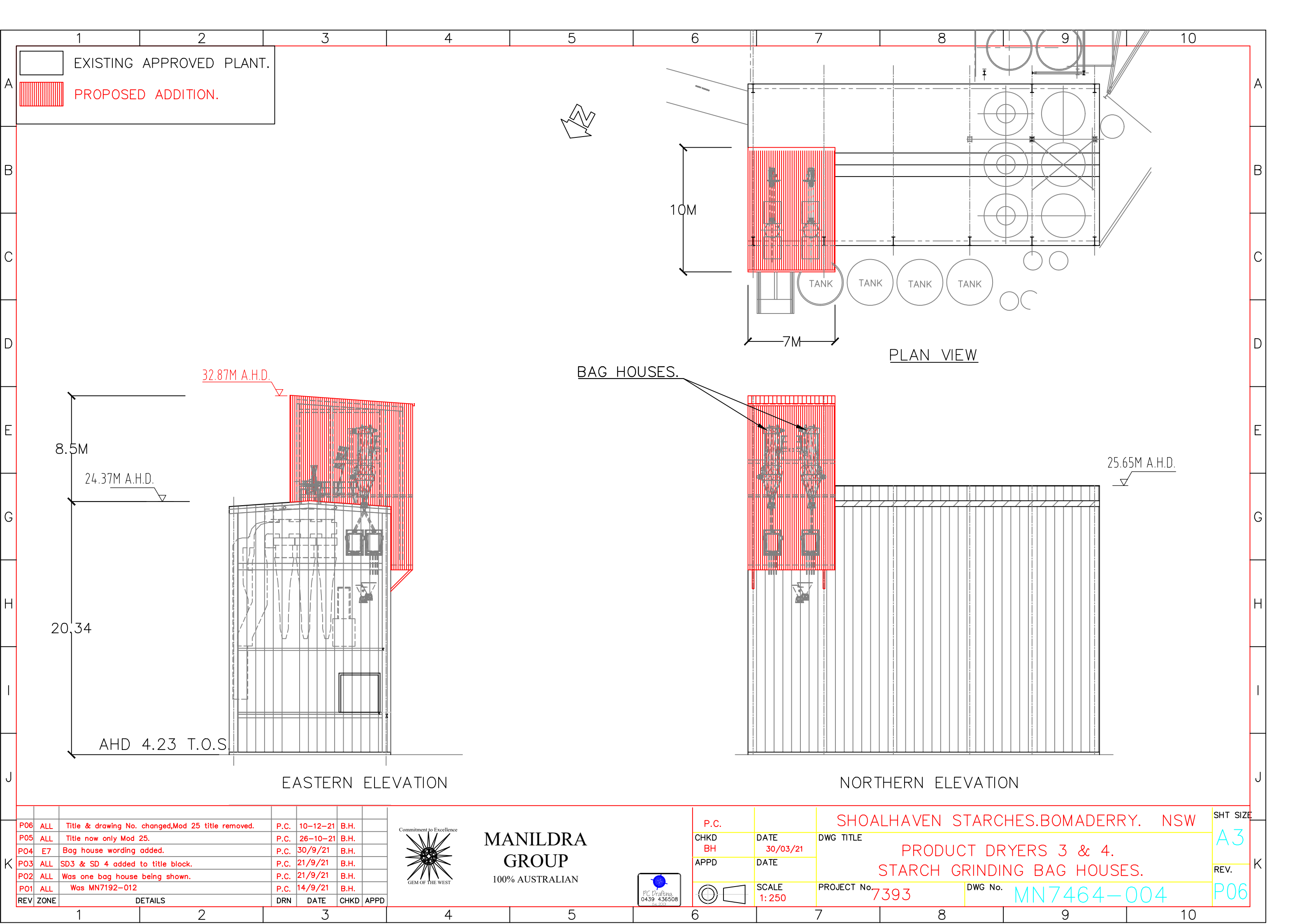
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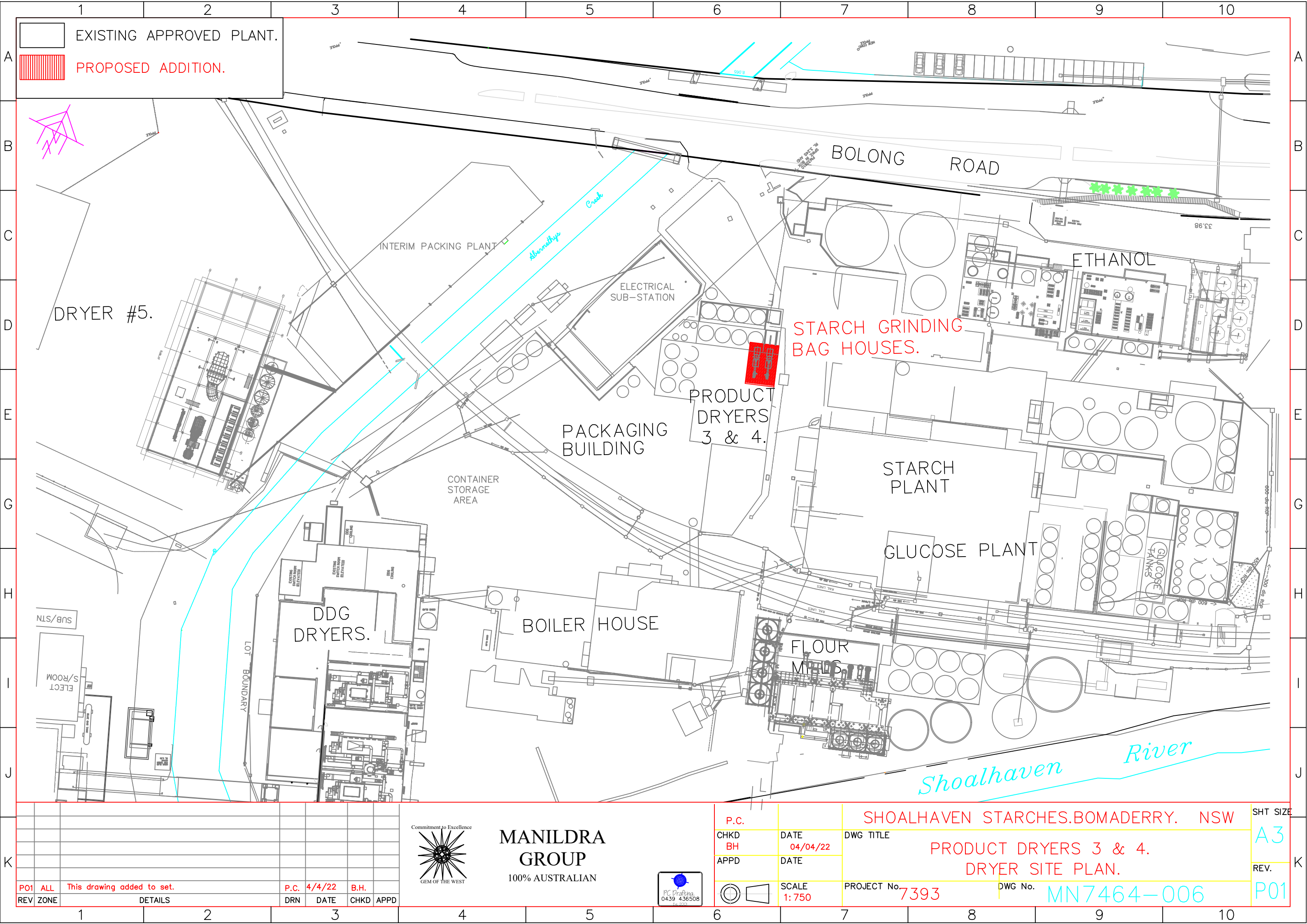
P.C.	12/5/21	SHOALHAVEN STARCHES.BOMADERRY. NSW	
CHKD	DATE	DWG TITLE	
B.H.		PAPER MILL RAIL EXTENSION.	
APPD	DATE	TYPICAL ELEVATION.	
SCALE 1:100		PROJECT No. 7464	DWG No. MN7464-003

A3

REV.

P05





PO1	ALL	This drawing added to set.	P.C.	4/4/22	B.H.
REV	ZONE	DETAILS	DRN	DATE	CHKD APPD
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					



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P.C.	DATE	DWG TITLE	SHT SIZE
CHKD BH	04/04/22	PRODUCT DRYERS 3 & 4.	A3
APPD	DATE	DRYER SITE PLAN.	REV.
SCALE 1:750	PROJECT No. 7393	DWG No. MN7464-006	P01
6	7	8	9
10			

PROPOSED RAIL EXTENSION AND
DRYERS #3 & #4 BAG HOUSES.

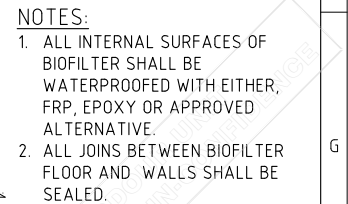
PROJECT No. 7464

09/05/22

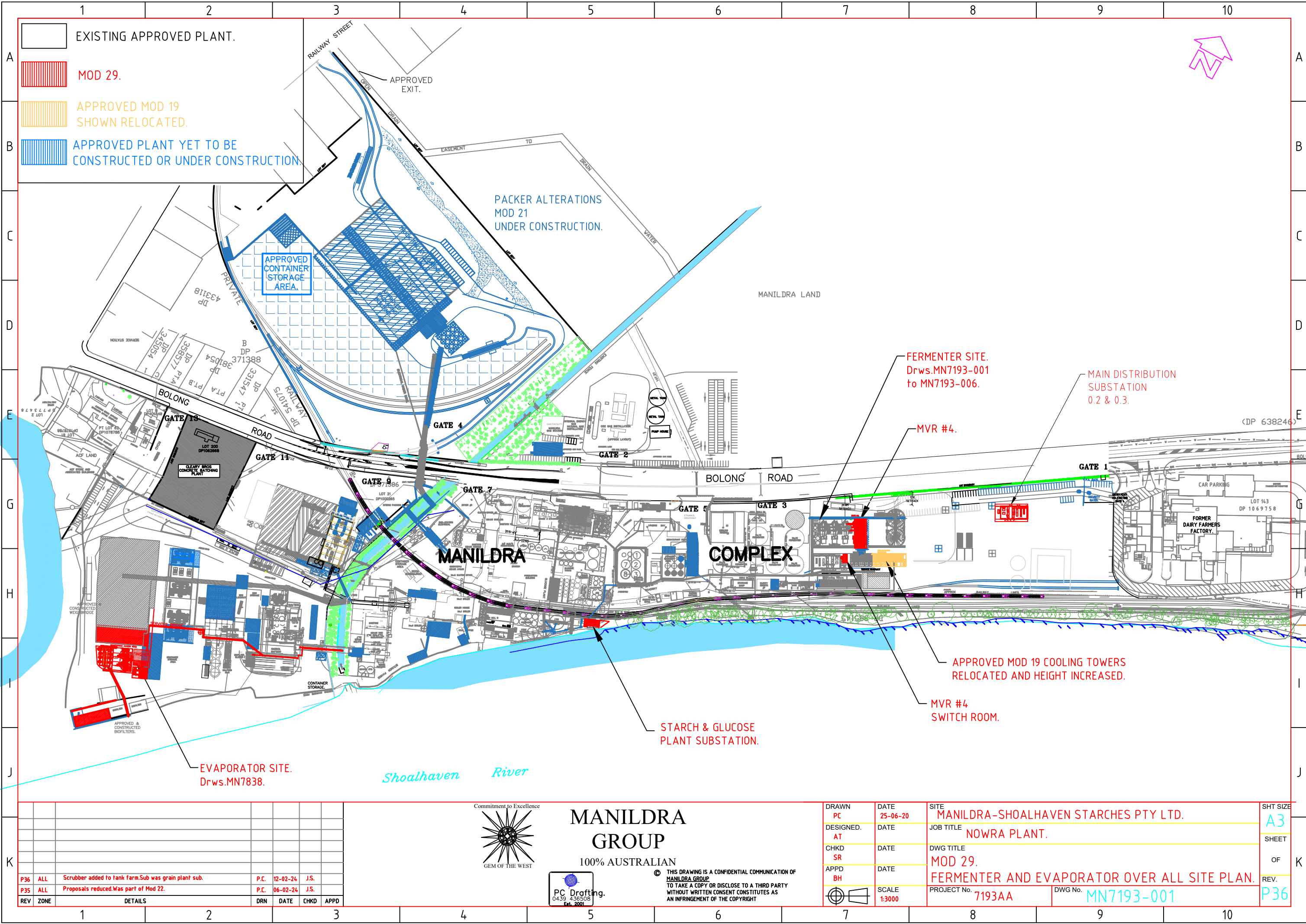
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Appendix B

Modification 29 drawing set

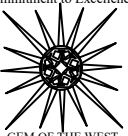


CLIENT / PROJECT		DRAWING No.		REV
SHOALHAVEN STARCHES		1752-001		A
160 BOLON RD, BOMADAREY, NSW.				
TITLE		CLIENT CODE	A1	
		N1752L.04		
		JOB No.		
SHOALHAVEN STARCHES MOD 22 - EVAPORAOR UPGRADE BIOFILTER ARRANGEMENT		N1752L		
		AutoCAD FILENAME		
		1752-001A.DWG		



REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
P36	ALL	Scrubber added to tank farm. Sub was grain plant sub.	P.C.	12-02-24	J.S.	
P35	ALL	Proposals reduced. Was part of Mod 22.	P.C.	06-02-24	J.S.	

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PC Drafting.

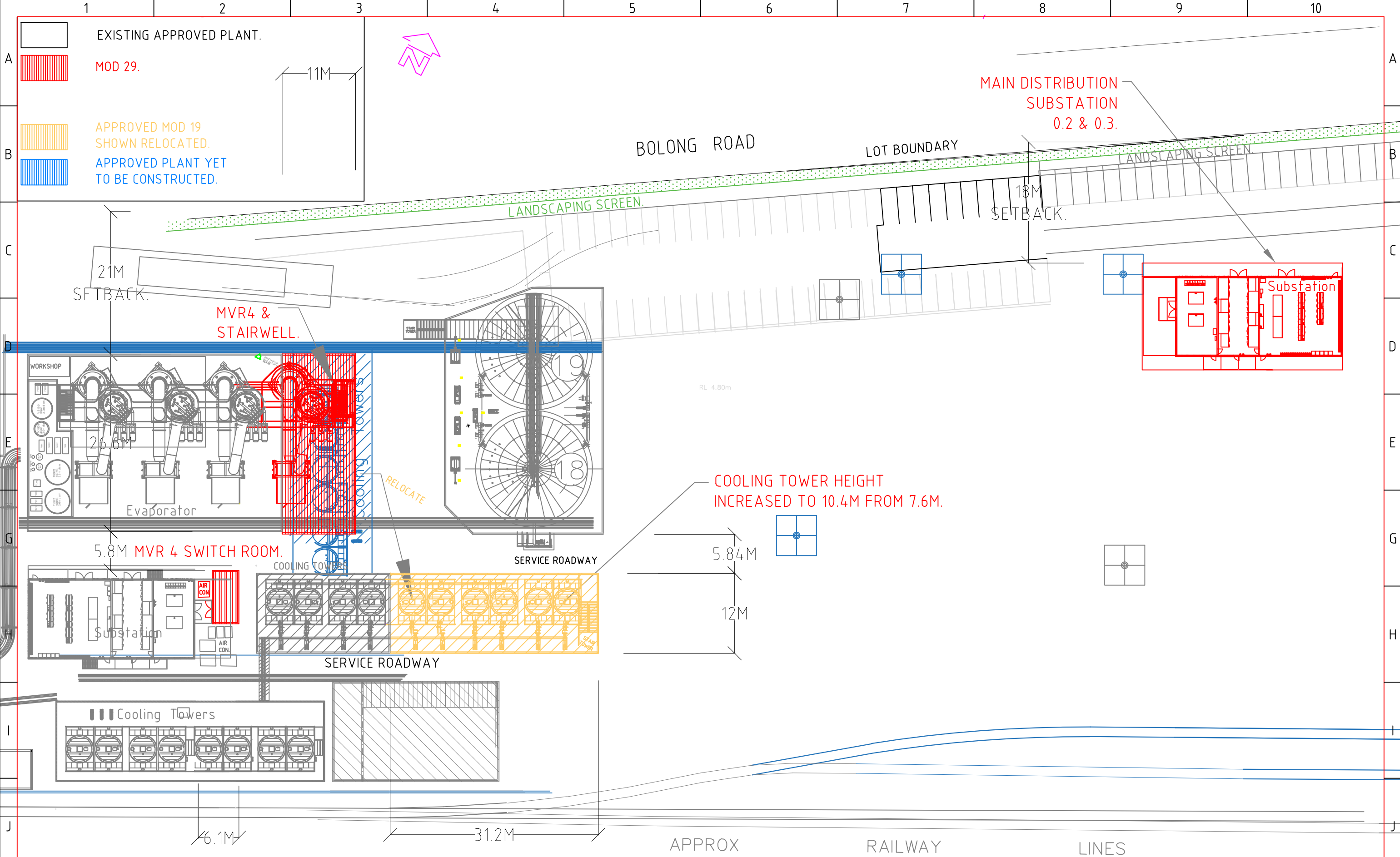
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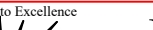
Est. 2001

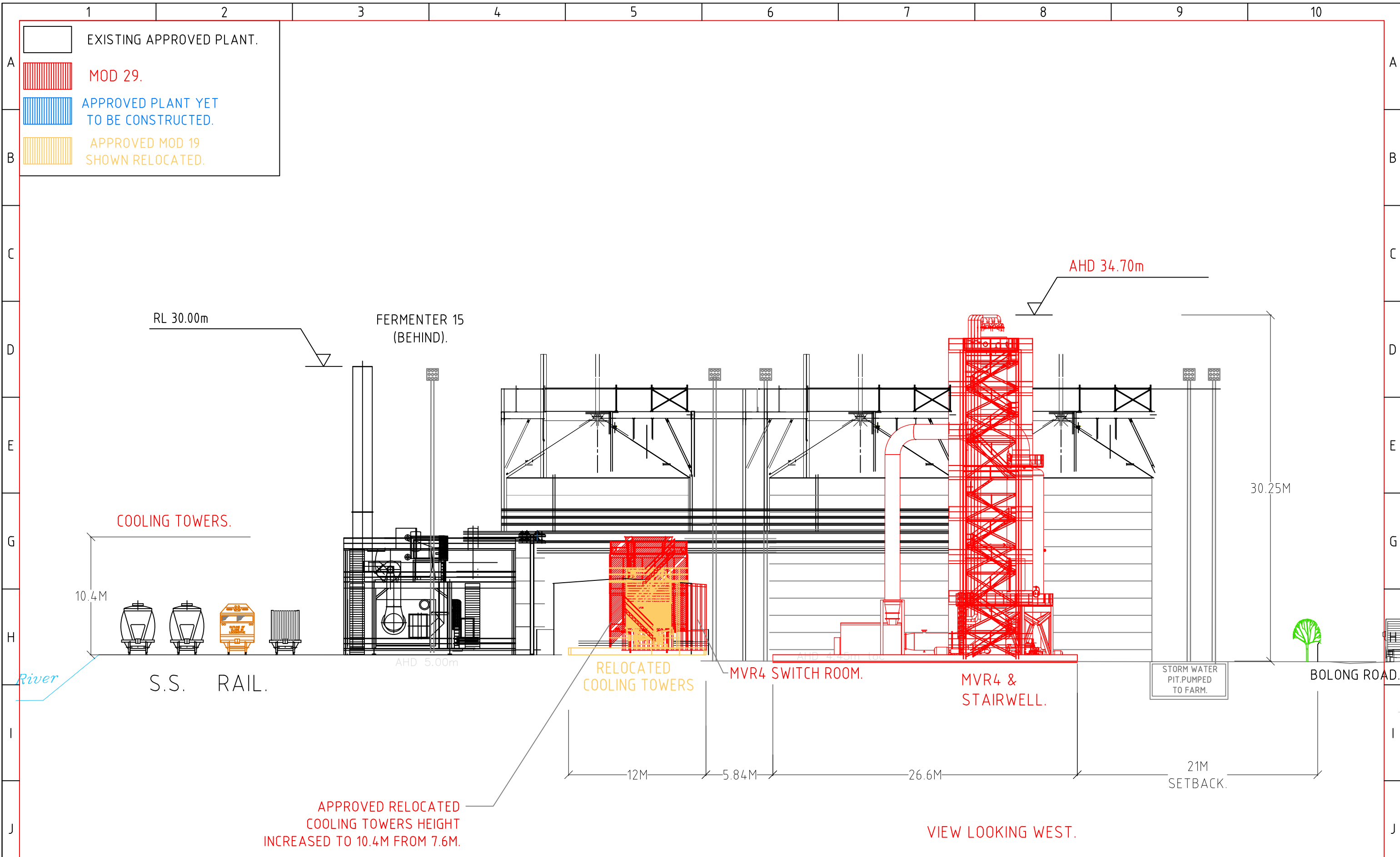
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DRAWN PC	DATE 25-06-20	SITE MANILDRA-SHOALHAVEN STARCHES PTY LTD.	SHT SIZE A3
DESIGNED. AT	DATE	JOB TITLE NOWRA PLANT.	SHEET
CHKD SR	DATE	DWG TITLE MOD 29.	OF
APPD BH	DATE	FERMENTER AND EVAPORATOR OVER ALL SITE PLAN.	REV. P36
SCALE 1:3000	PROJECT No. 7193AA	DWG No. MN7193-001	

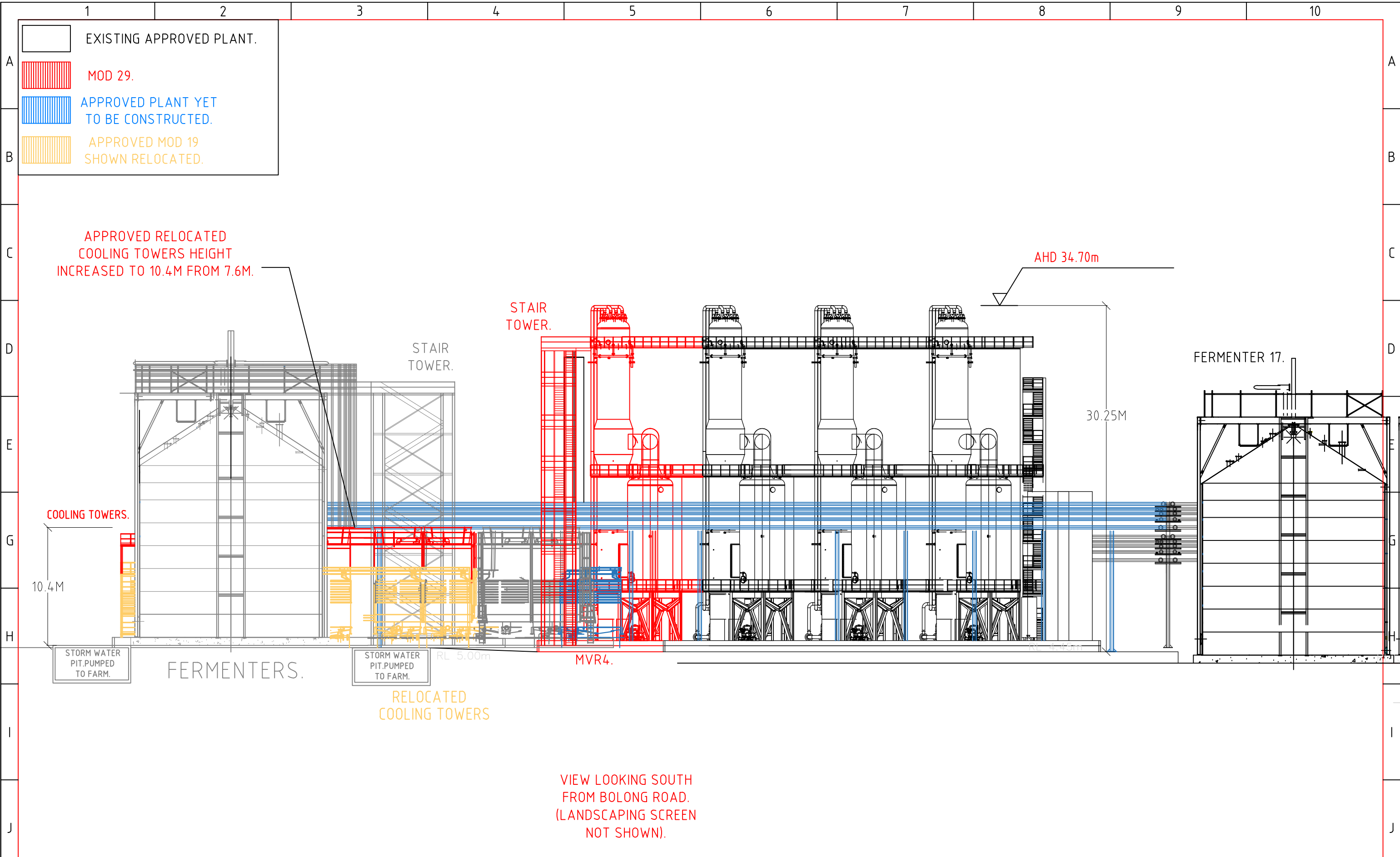


K	P24	G4	Substation addition.	P.C.	12-04-23	D.J.	Commitment to Excellence  GEM OF THE WEST MANILDRA GROUP 100% AUSTRALIAN  PC Drafting, 0439 436508 est. 2000	P.C.	01/12/20	SHOALHAVEN STARCHES.BOMADERRY. NSW			SHT SIZE		
	P24	G4	Substation addition.	P.C.	12-04-23	D.J.		CHKD	DATE	DWG TITLE			A3		
	P24	H1	Existing scrubber stack extension added.	P.C.	12-04-23	D.J.		BH							
	P23	E5	Footprint was 10m wide (now 11m wide).	P.C.	12-10-22	D.J.		APPD	DATE	MOD 29.			REV.		
	P22	H6	Cooling towers height increased.	P.C.	20-7-22	B.H.					SITE PLAN VIEW.			K	
	P21	G7	Scrubber #12 added & #21 removed.	P.C.	19-7-22	B.H.									
	P20	ALL	Layout reconfigured.	P.C.	01-7-22	B.H.									
REV	ZONE	DETAILS		DRN	DATE	CHKD	APPD		SCALE 1:500	PROJECT No. 7193B	DWG No. MN7193-002	P26			
		1	2	3		4		5		6		7	8	9	10



Commitment to Excellence  GEM OF THE WEST MANILDRA GROUP 100% AUSTRALIAN PC Drafting 0439 436508 Est. 2001						DRAWN P.C. DATE 25/06/19		JOB TITLE 25/06/19		SHOALHAVEN STARCHES.BOMADERRY. NSW MOD 29. EASTERN ELEVATION. PROJECT No. 7193D DWG No. MN7193-003	SHT SIZE A3 REV. P18
CHKD T.J. DATE						DWG TITLE					
APPD DATE											
SCALE 1:500											
REV ZONE DETAILS DRN DATE CHKD APPD											

P18	ALL	Scaled back & was part of mod 22.	P.C.	05-02-24	JS
P17	ALL	Substation extension added.Completed works now shown grey.	P.C.	14-07-23	B.H
P16	ALL	Scrubber stack heights increased.Air cons added to sub.	P.C.	12-4-23	B.H
P15	ALL	Cooling towers height increased.	P.C.	20-7-22	B.H
P14	ALL	Layout reconfigured.	P.C.	01-7-22	B.H



K

P20	ALL	Stair tower added.	P.C	13-02-24	JS	
P19	ALL	Scaled back & was part of mod 22.	P.C	05-02-24	JS	
P18	ALL	Substation extension added.Completed works now shown grey.	P.C	14-07-23	B.H	
P17	ALL	Scrubber stack heights increased.#12 & existing added.	P.C	12-4-23	B.H	
P16	ALL	Stair tower moved 1m east.	P.C	12-10-22	DJ	
P15	ALL	Cooling towers height increased.	P.C	20-7-22	B.H	
P14	ALL	Layout reconfigured.	P.C.	01-7-22	B.H.	
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
	1	2		3		

Commitment to Excellence



GEM OF THE WEST

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PC Drafting.
0439 436508
Est. 2001

DRAWN	DATE	JOB TITLE
P.C.	25/06/19	SHOALHAVEN STARCHES.BOMADERRY. NSW
CHKD	DATE	DWG TITLE
T.J.		MOD 29.
APPD	DATE	NORTHERN ELEVATION.
	SCALE	PROJECT No.
	1:500	7193D

DWG No.

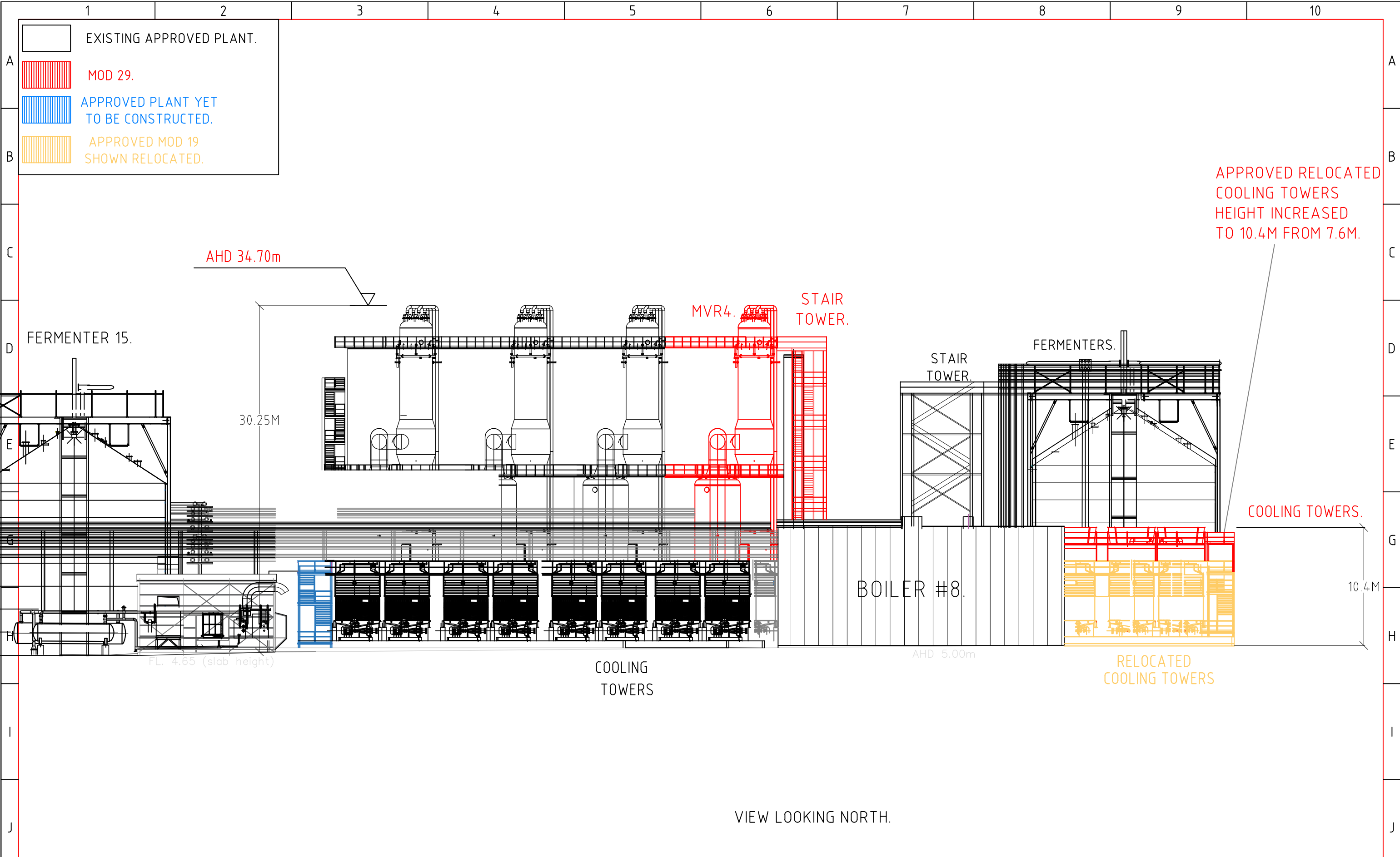
MN7193-004

SHT SIZE

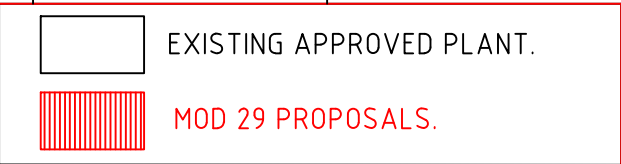
A3

REV.

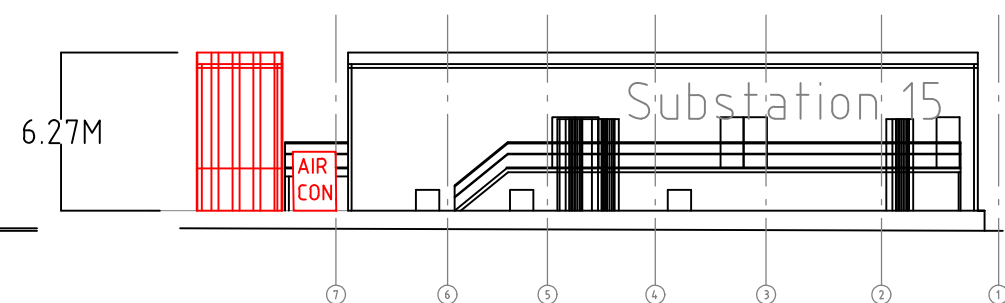
P20



K	P22	ALL	Proposed new cooling towers removed.	P.C	13-02-24	JS	Commitment to Excellence  MANILDRA GROUP 100% AUSTRALIAN  PC Drafting. 0439 436508 Est. 2001	DRAWN	DATE	JOB TITLE	SHOALHAVEN STARCHES.BOMADERRY. NSW				SHT SIZE				
	P21	ALL	Scaled back & was part of mod 22.	P.C	05-02-24	JS		P.C.	25/06/19	A3									
	P20	ALL	Substation extension added.Completed works now shown grey.	P.C	14-07-23	B.H.		CHKD	DATE	DWG TITLE	MOD 29.	REV.							
	P19	ALL	Scrubber stack heights increased.Air cons added to sub.	P.C	12-4-23	B.H.		APPD	DATE	SOUTHERN ELEVATION.									
	P18	ALL	Stair tower moved 1m east.	P.C	12-10-22	DJ			SCALE	PROJECT No.	DWG No.	P22							
	P17	ALL	Cooling towers height increased.	P.C	20-7-22	B.H.			1:300	7193D	MN7193-005								
	REV	ZONE	DETAILS	DRN	DATE	CHKD		APPD											
1		2		3		4		5		6		7		8		9		10	

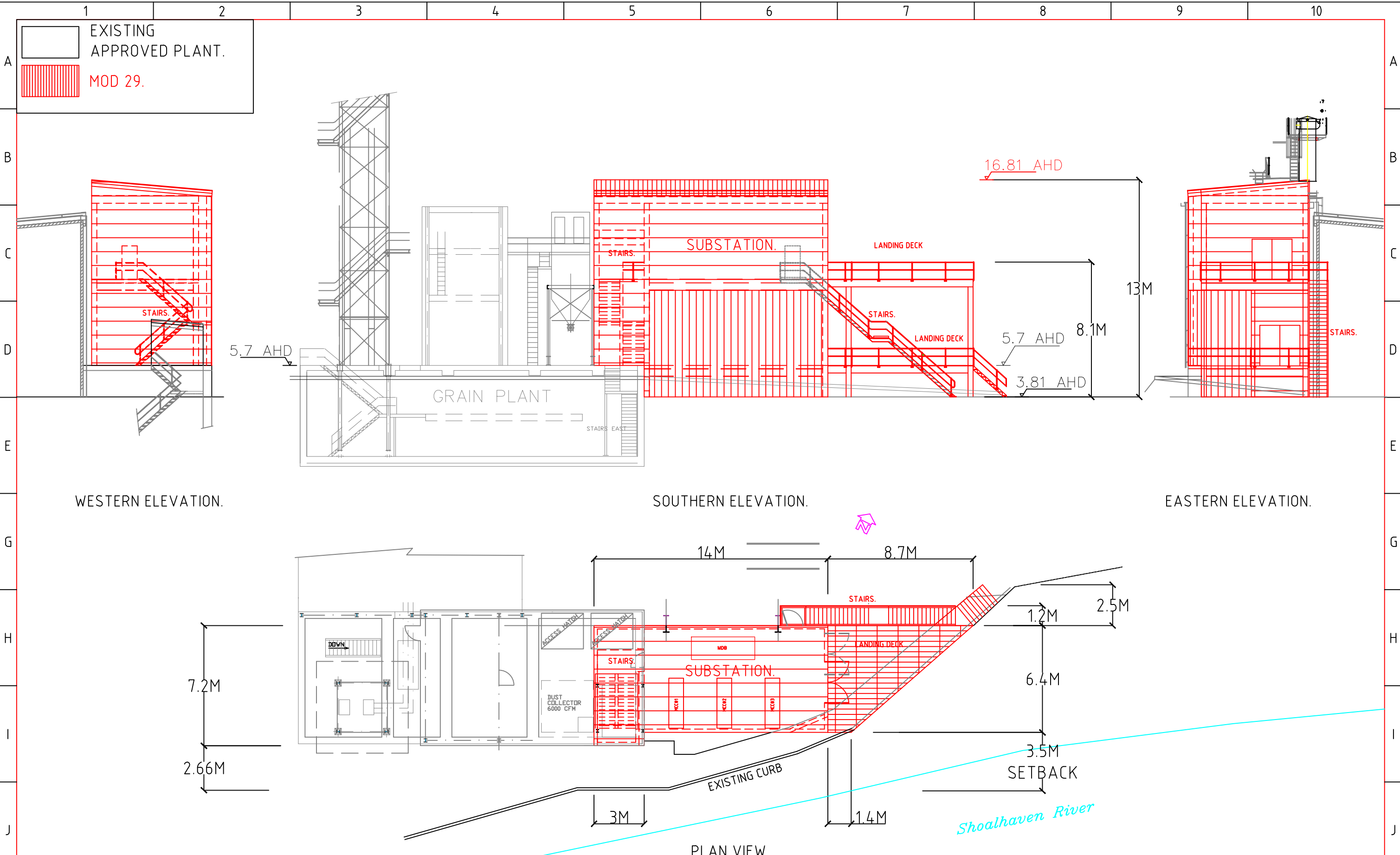


MVR4 SWITCH ROOM.

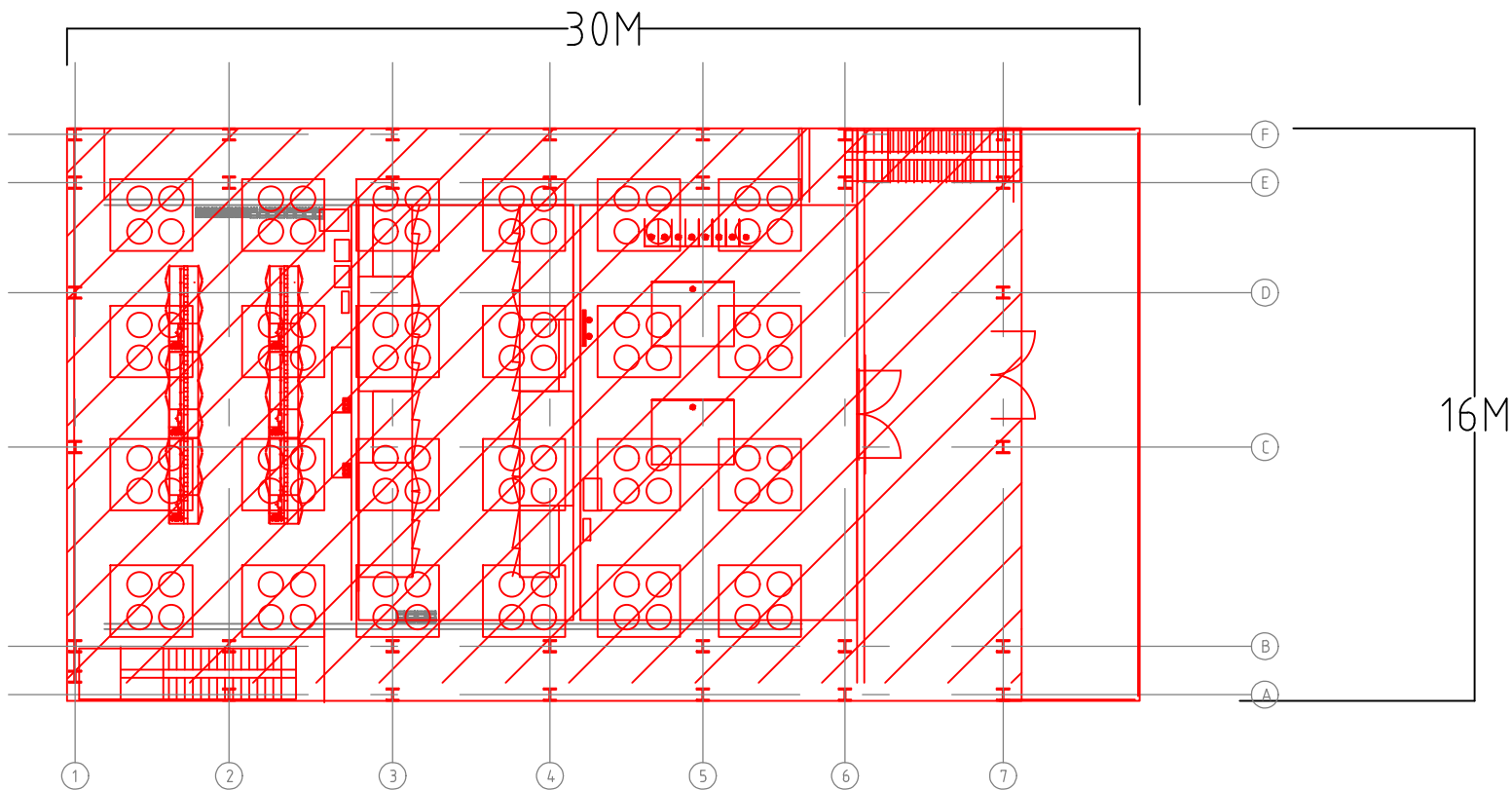


NORTHERN ELEVATION.

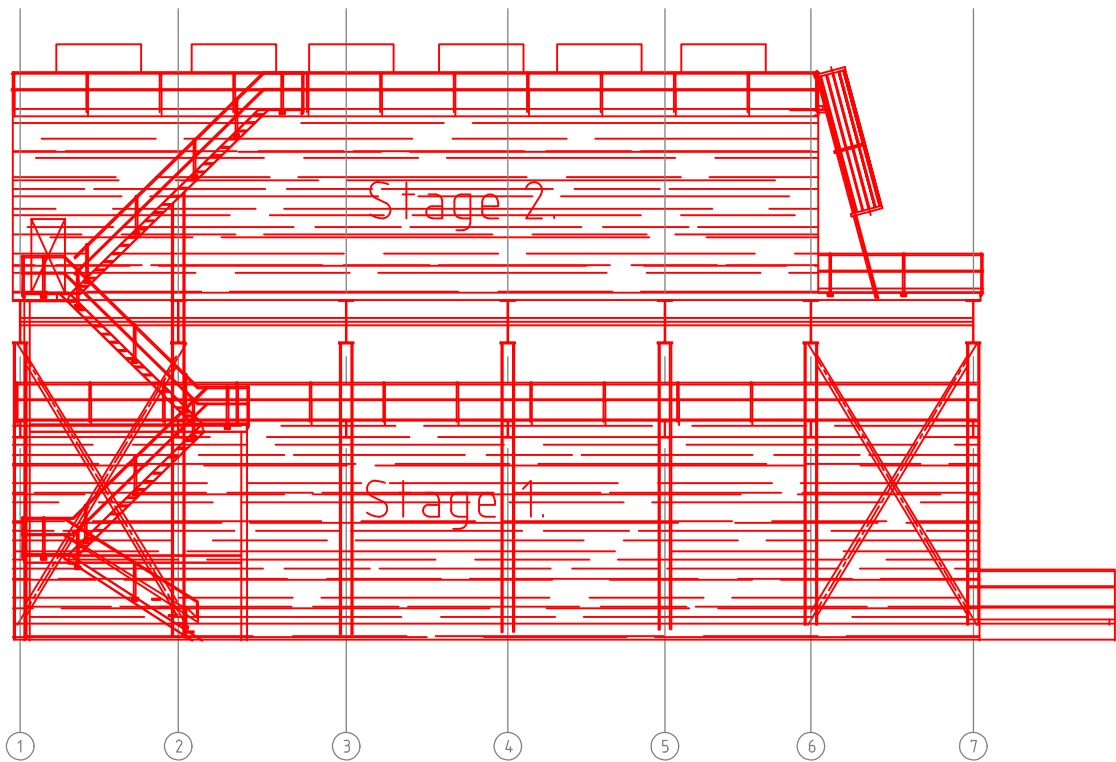
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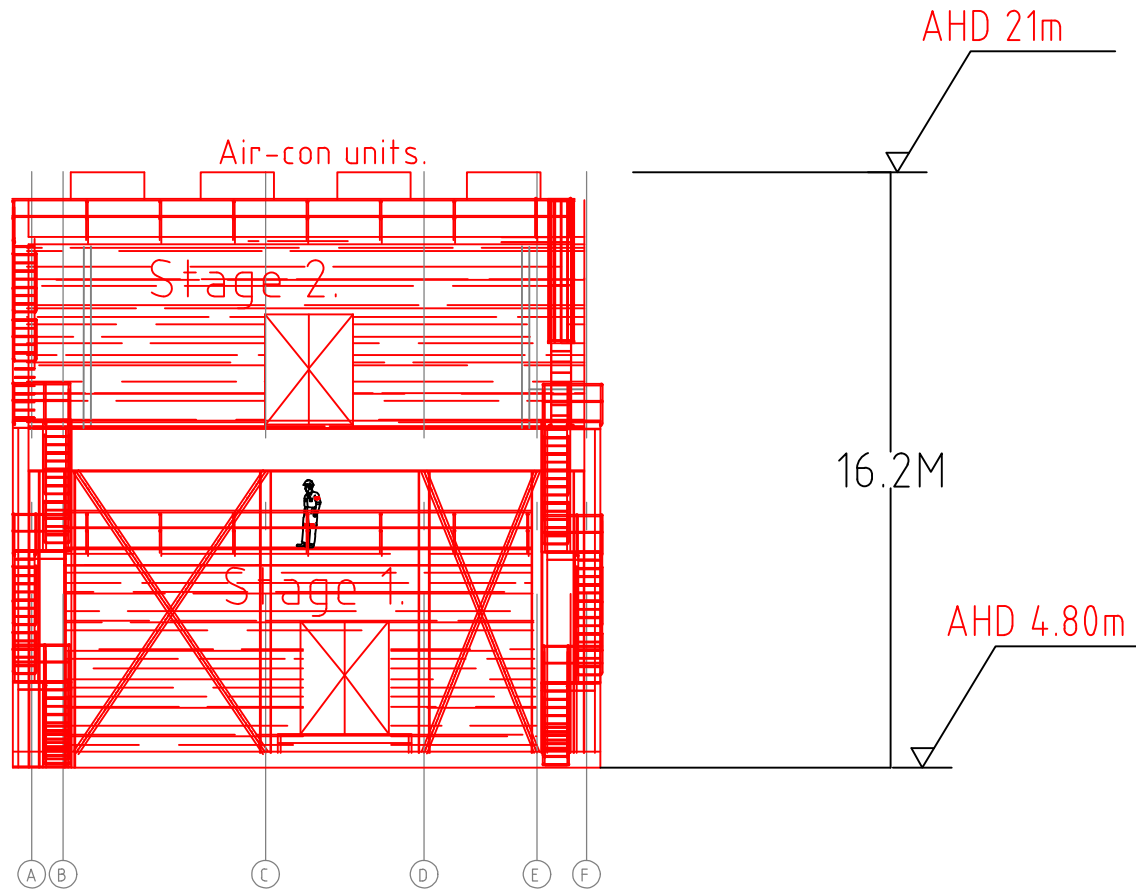
P07	ALL	Was mod 22.	P.C.	7/02/24	Commitment to Excellence  GEM OF THE WEST MANILDRA GROUP 100% AUSTRALIAN PC Drafting. 0439 436508 Est. 2001	P.C.		SHOALHAVEN STARCHES .BOMADERRY.NSW.		SHT SIZE										
P06	ALL	Indicative Mod 26 removed.	P.C.	14/07/23		CHKD	DATE	DWG TITLE		A3										
P05	ALL	Indicative Mod 26 added.	P.C.	01/08/22		JC	30/8/21													
P04	ALL	North-eastern stairs added.	P.C.	26/07/22		APPD	DATE	MOD 29.		REV.										
P03	ALL	Was MN7769-009.	P.C.	21/07/22		BH		STARCH & GLUCOSE PLANT SUBSTATION.												
P02	ALL	Was MN7079-013.	P.C.	10/11/21		BH		PROJECT No. 7532		P07										
P01	ALL	First proposal.	P.C.	30/8/21		JC	PW	DWG No.	MN7193-010											
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD														
		1	2		3		4		5		6		7		8		9		10	



PLAN VIEW.



SIDE ELEVATION.



END ELEVATION.

REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
P02	ALL	This drawing was the container inverter.	P.C.	14-8-23	JC	
P01	ALL	New proposal.	P.C.	14-8-23	JC	

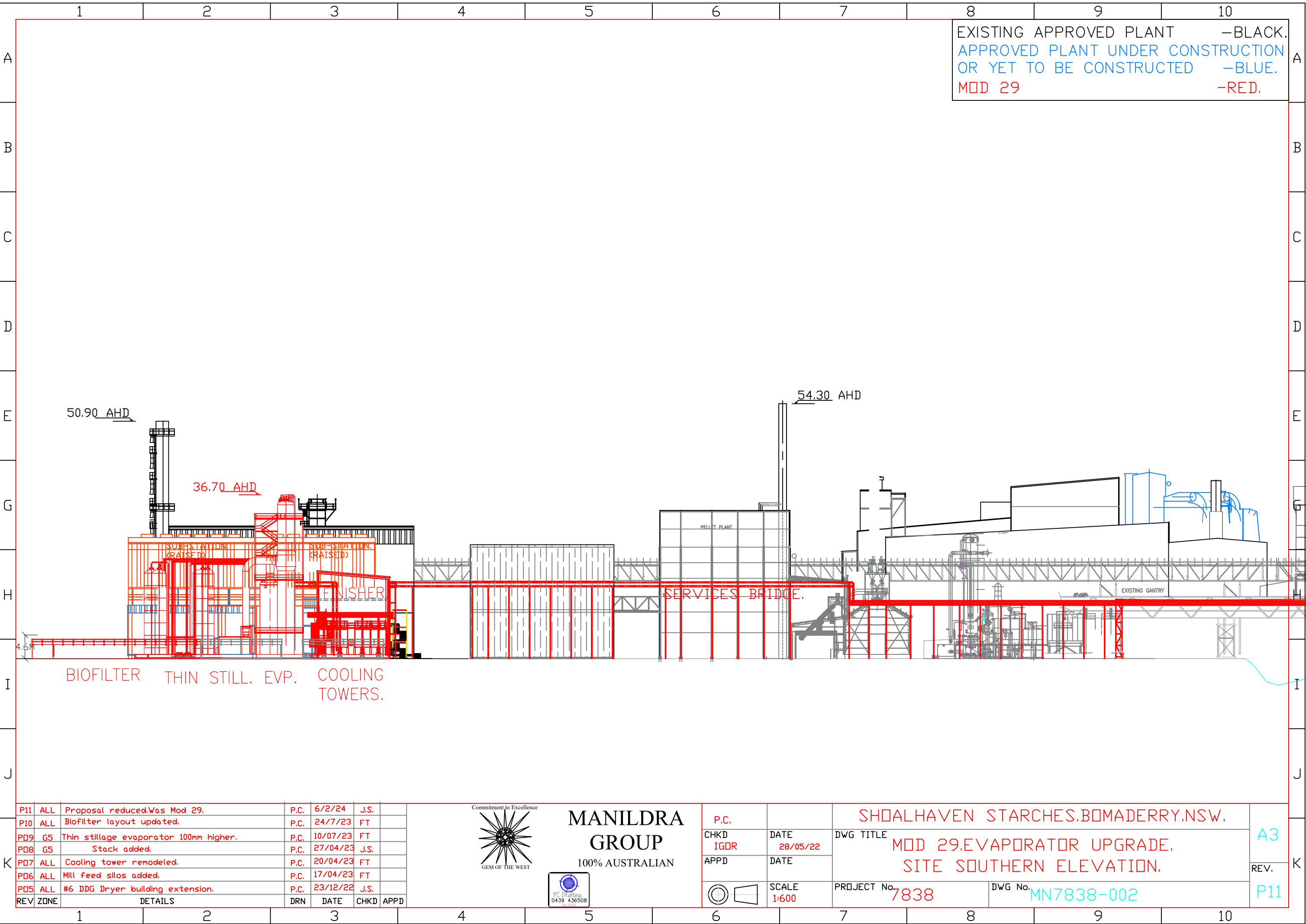


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DRAWN P.C.	DATE 14/08/23	JOB TITLE SHOALHAVEN STARCHES.BOMADERRY. NSW	SHT SIZE A3
CHKD JC	DATE	DWG TITLE MOD 29.	REV. P02
APPD	DATE	PROJECT No. 7549-013	
	SCALE 1:200	DWG No. MN7549-013	

MOD 29.		PROJECT No. 7193D	
		13/02/24	
FERMENTER ADDITIONS.			
Drawing No.	REV.		
MN7193-001	P36	SITE PLAN.	
MN7193-002	P26	SITE PLAN VIEW.	
MN7193-003	P18	EASTERN ELEVATION.	
MN7193-004	P20	NORTHERN ELEVATION.	
MN7193-005	P22	SOUTHERN ELEVATION.	
MN7193-006	P06	MVR4 SWITCH ROOM.	
MN7193-010	P07	STARCH & GRAIN PLANT SUBSTATION.	
MN7549-013	P02	MAIN DISTRIBUTION SUBSTATION 0.2 & 0.3	
EVAPORATOR UPGRADE.			
MN7838-001	P14	SITE PLAN VIEW.	
MN7838-002	P11	SITE SOUTHERN ELEVATION.	
MN7838-003	P07	SITE EASTERN ELEVATION.	
MN7838-004	P03	FINISHER GA.	
MN7838-005-1	P01	THIN STILLAGE EVAPORATOR.GA.	
MN7838-005-2	P01	THIN STILLAGE EVAPORATOR.3D.	
MN7838-006	P04	SUBSTATION RAISED GA.	
MN7838-008	P06	COOLING TOWER GA.	
MN7838-009	P07	BIO-FILTER LAYOUT.	
MN7838-013	P03	TANK FARM.	
1752-001	A	BIO-FILTER GA.	



EXISTING APPROVED PLANT –BLACK.
APPROVED PLANT UNDER CONSTRUCTION –BLUE.
OR YET TO BE CONSTRUCTED –BLUE.
MOD 29 –RED.

P11	ALL	Proposal reduced.Was Mod 29.	P.C.	6/2/24	J.S.	
P10	ALL	Biofilter layout updated.	P.C.	24/7/23	FT	
P09	G5	Thin stillage evaporator 100mm higher.	P.C.	10/07/23	FT	
P08	G5	Stack added.	P.C.	27/04/23	J.S.	
P07	ALL	Cooling tower remodeled.	P.C.	20/04/23	FT	
P06	ALL	Mill feed silos added.	P.C.	17/04/23	FT	
P05	ALL	#6 DDG Dryer building extension.	P.C.	23/12/22	J.S.	
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD



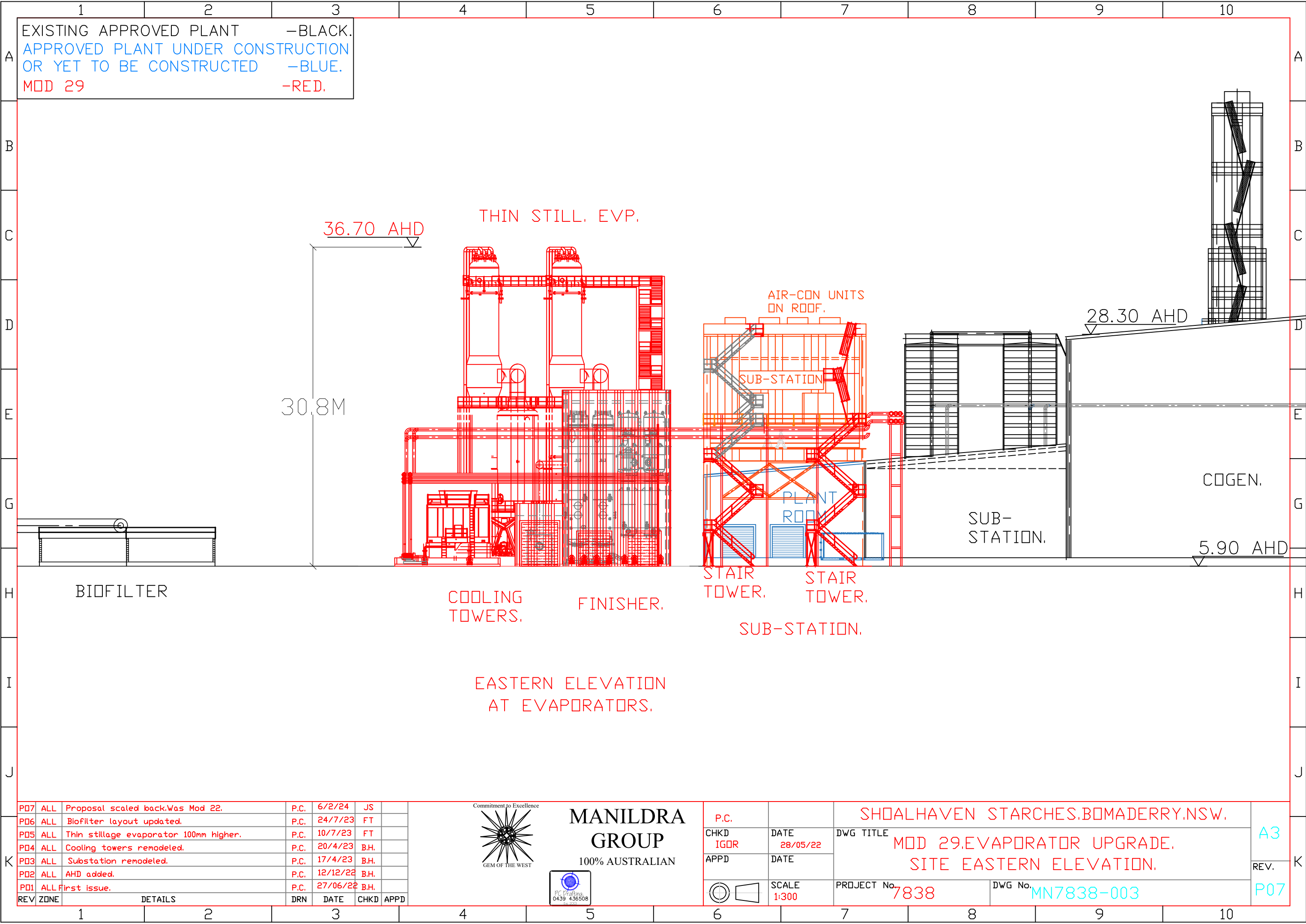
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P.C.	DATE
CHKD IGOR	28/05/22
APPD	DATE
SCALE 1:600	

DWG TITLE	PROJECT No.	DWG No.
SHOALHAVEN STARCHES.BOMADERRY.NSW. MOD 29.EVAPORATOR UPGRADE. SITE SOUTHERN ELEVATION.	7838	MN7838-002

A3
REV.
P11



P07	ALL	Proposal scaled back.Was Mod 22.	P.C.	6/2/24	JS	
P06	ALL	Biofilter layout updated.	P.C.	24/7/23	FT	
P05	ALL	Thin stillage evaporator 100mm higher.	P.C.	10/7/23	FT	
P04	ALL	Cooling towers remodeled.	P.C.	20/4/23	B.H.	
P03	ALL	Substation remodeled.	P.C.	17/4/23	B.H.	
P02	ALL	AHD added.	P.C.	12/12/22	B.H.	
P01	ALL	First issue.	P.C.	27/06/22	B.H.	
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD



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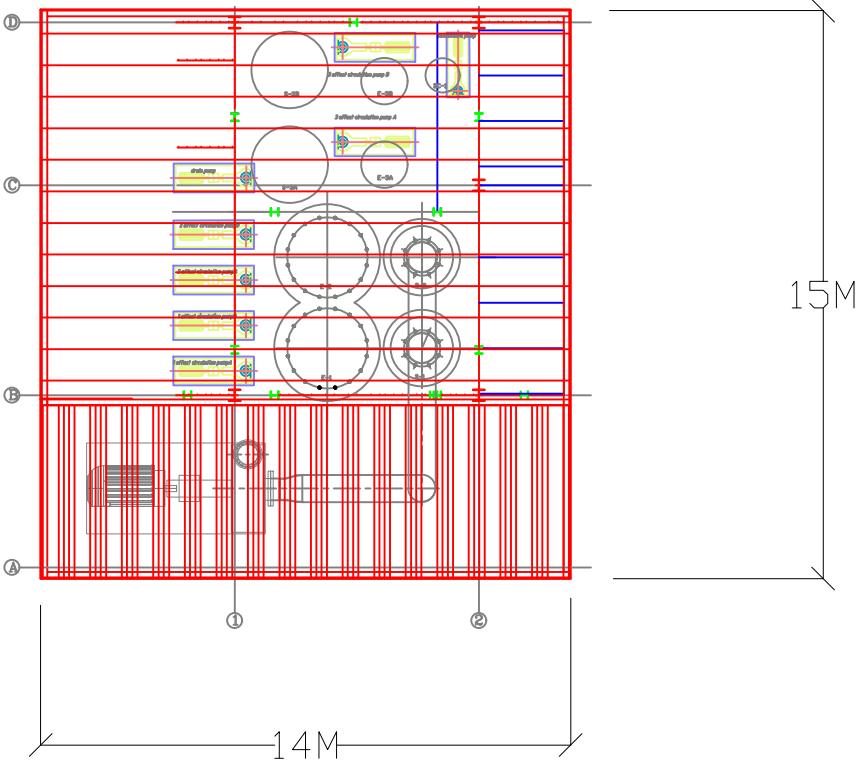
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CHKD IGDR	DATE 28/05/22	DWG TITLE MOD 29.EVAPORATOR UPGRADE. SITE EASTERN ELEVATION.			
APPD	DATE				
	SCALE 1:300	PROJECT No. 7838	DWG No. MN7838-003	P07	

1 2 3 4 5 6 7 8 9 10

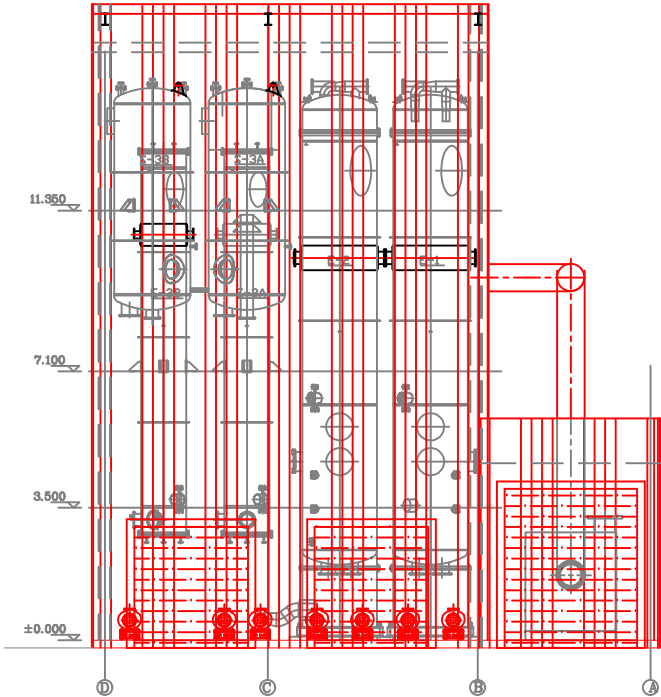
MOD 29 -RED.

A
B
C
D
E
G
H
I
J
K

A
B
C
D
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J
K

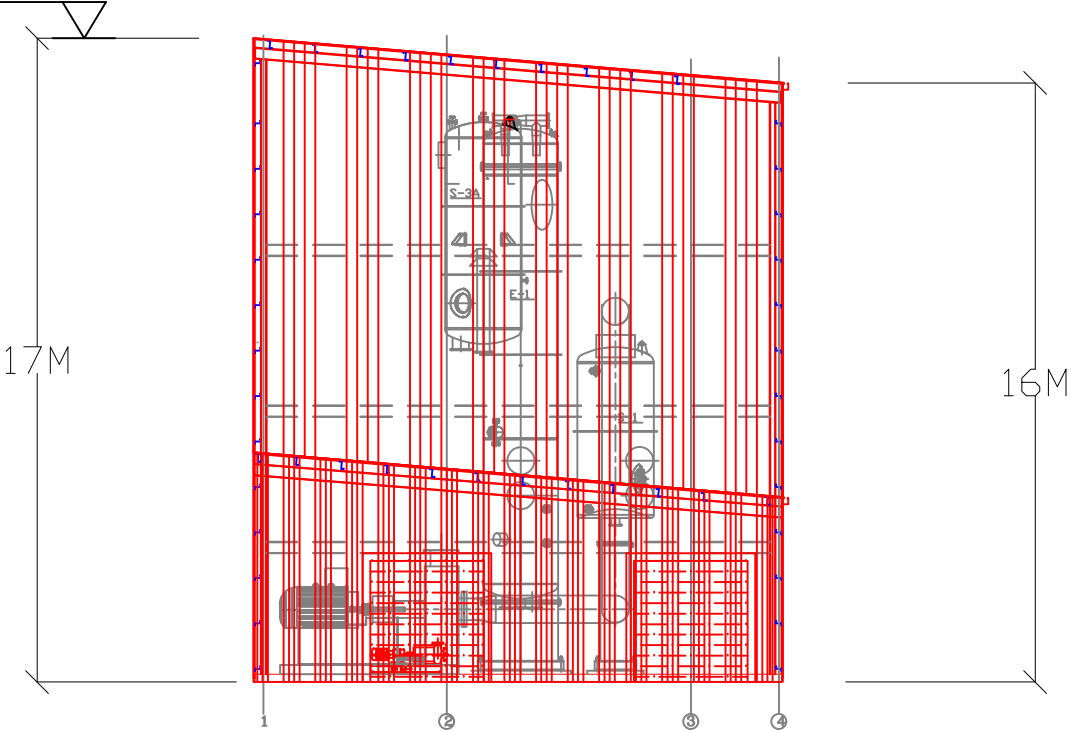


PLAN VIEW.



FRONT ELEVATION.

22.90 AHD



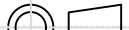
SIDE ELEVATION.

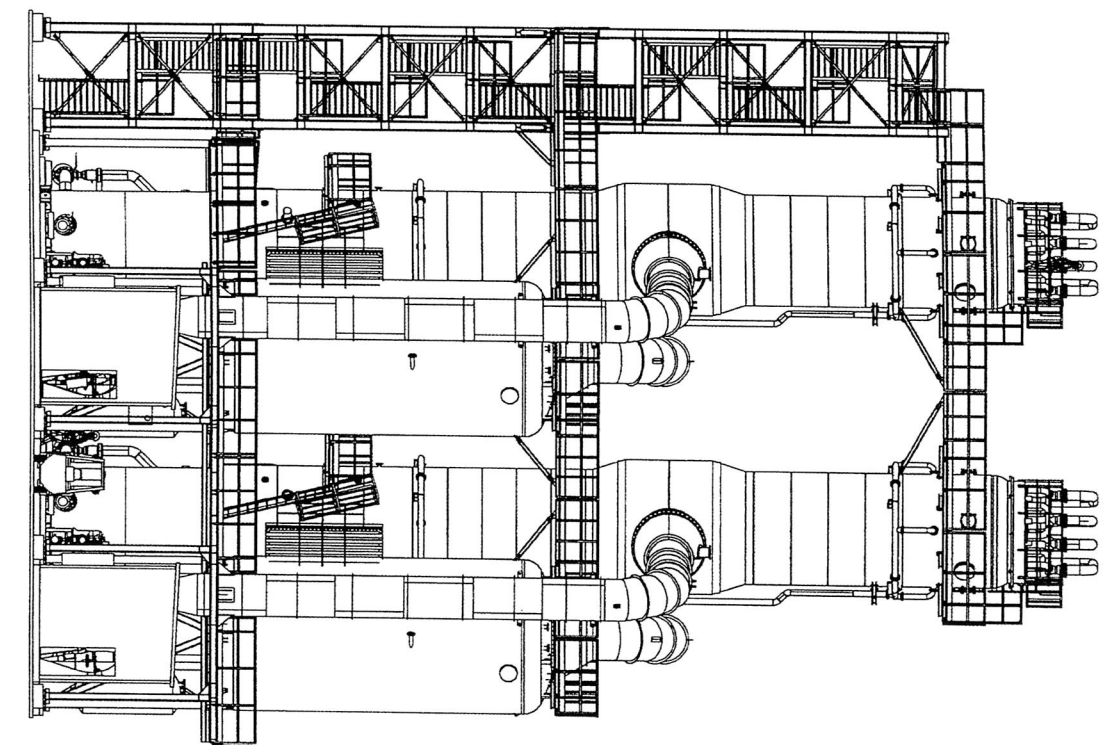
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
P03	ALL	Was part of Mod 22.	P.C.	6/2/24	JS	
P02	ALL	AHD added.	P.C.	12/12/22	B.H.	
P01	ALL	First Issue.	P.C.	27/06/22	B.H.	



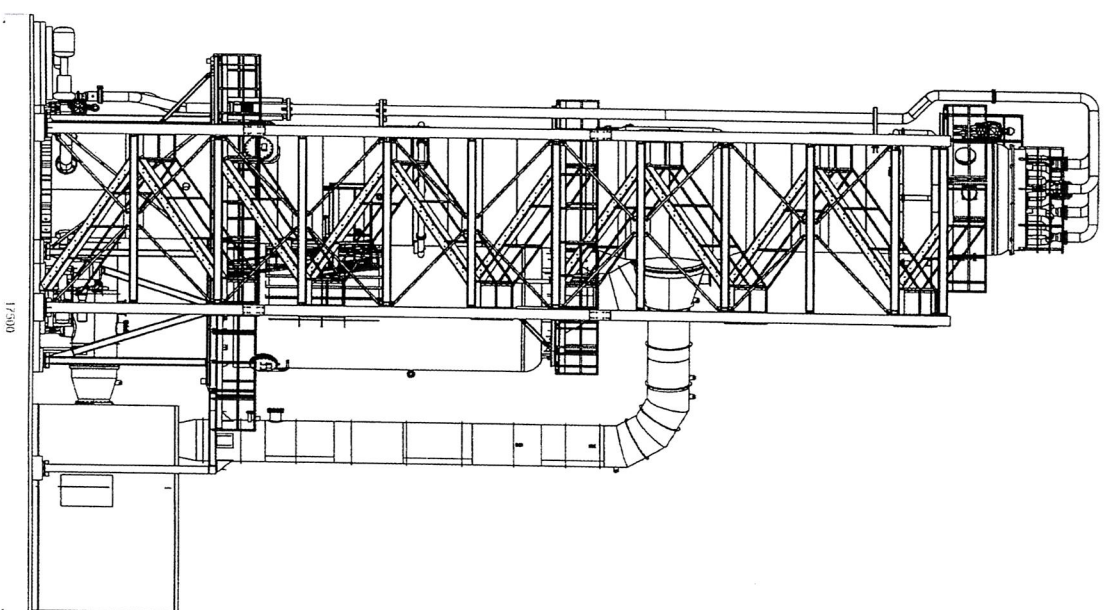
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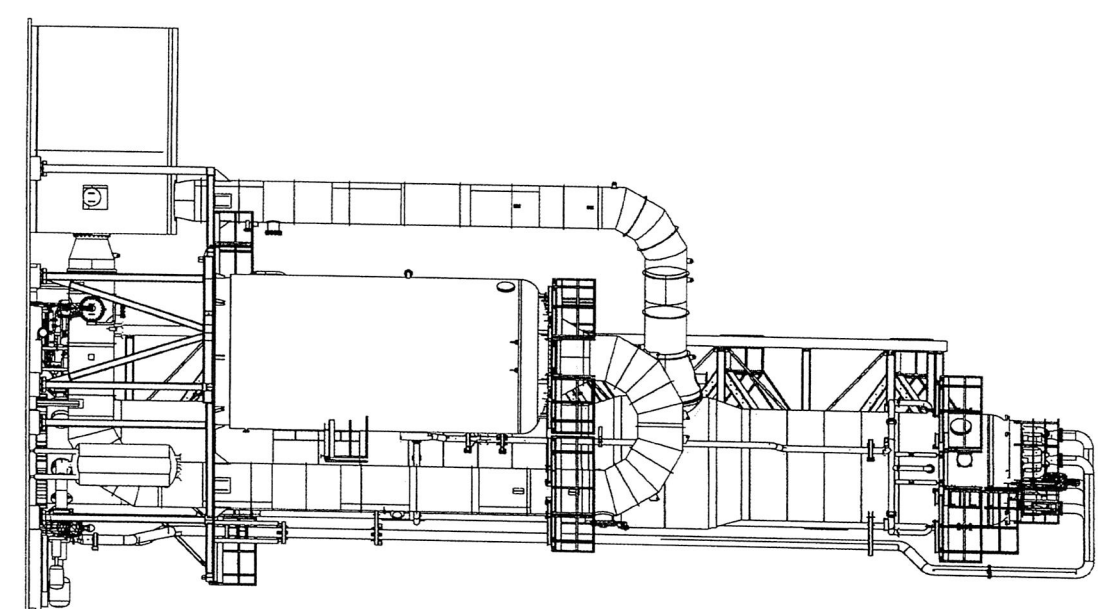
P.C.		SHOALHAVEN STARCHES.BOMADERRY.NSW.		A3
CHKD IGDR	DATE 28/05/22	DWG TITLE MOD 29.EVAPORATOR UPGRADE. FINISHER GA.		
APPD	DATE			REV.
	SCALE 1:200	PROJECT No. 7838	DWG No. MN7838-004	P03



FRONT VIEW

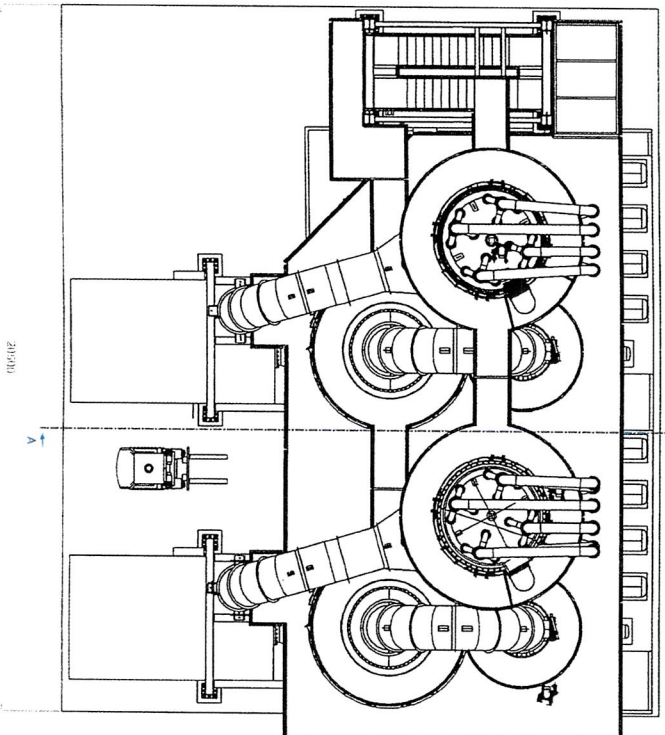


SIDE VIEW



SEC. A-A

TOP VIEW



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MANILDRA

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SHOALHAVEN STARCHES BOMADERRY NSW

DWG TITLE

MOD 29 EVAPORATOR UPGRADE
THIN STILLAGE EVAPORATOR GA

PROJECT No.

7838

DWG No.

MN7838-005-1



eteaengineering.com
Via Montorio 18, 12037 Saluzzo (CN)
ITALY
Tel. +39 0173 248111
Fax. +39 0173 248112

Type:

Customer:
MANILDRA

Project:
MVRs 7-8

Title:

3D LAYOUT

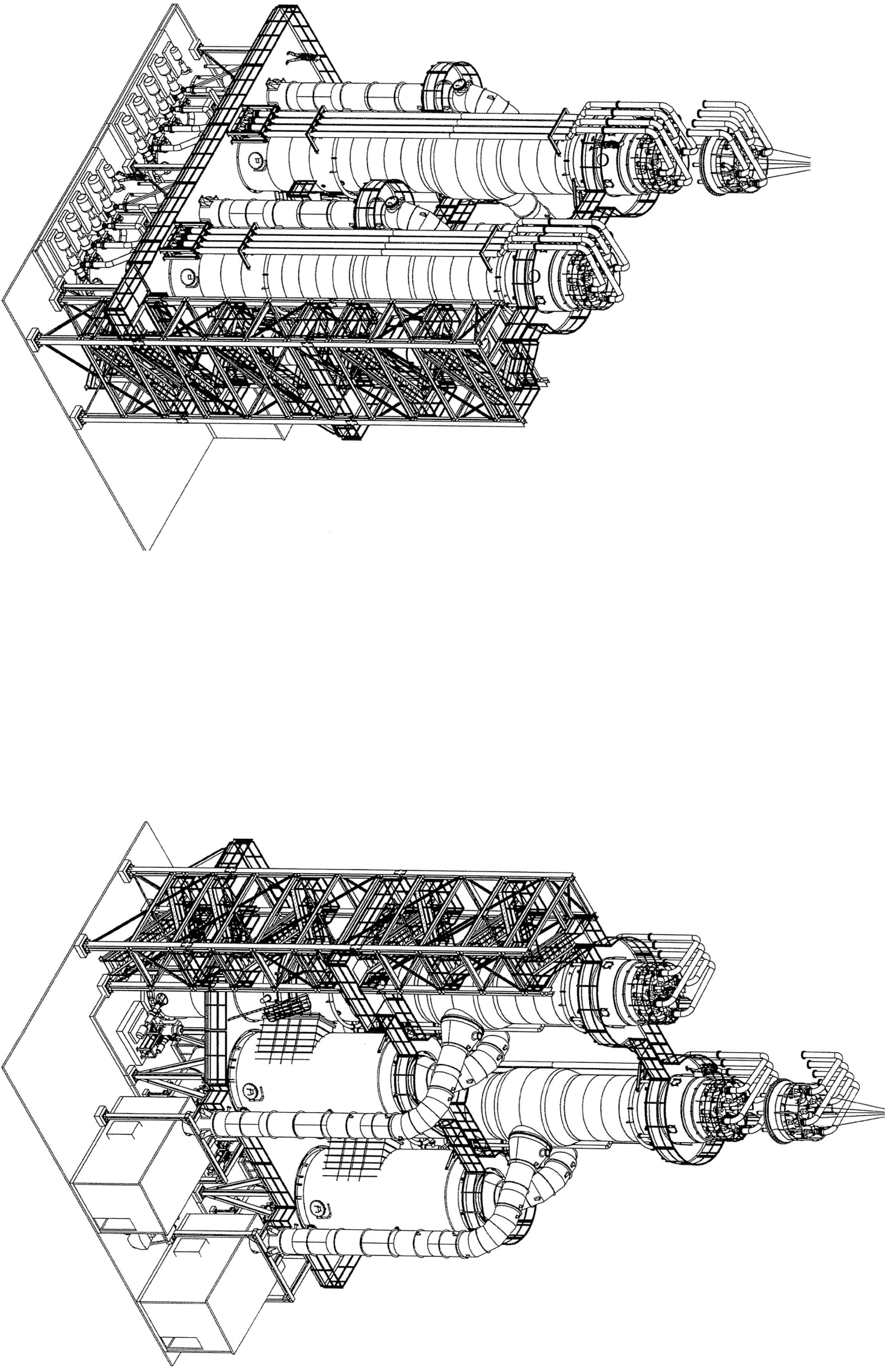
DWG No.

E52001

Rev.

Date: 09/11/22 by: Garino F. Scale: 1:100

Chk: mntd/yyj Surname N. Name: A1



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DWG TITLE

SHDHALHAVEN STARCHES BOMADERRY NSW

PROJECT No.

7838

DWG No.

MN7838-005-2

MOD 2A EVAPORATOR UPGRADE.

THIN STILLAGE EVAPORATOR GA.3D



Via Montello 18, 12027 Saluzzo (CN)
ITALY

eteagroup.com
www.eteagroup.com

Project:

MVRS 7-8

Title:

Type:

3D LAYOUT

Customer:

MANIL DRA

DWG No.

03/11/22

Drawn by:

Garnero F.

Scale:

1:100

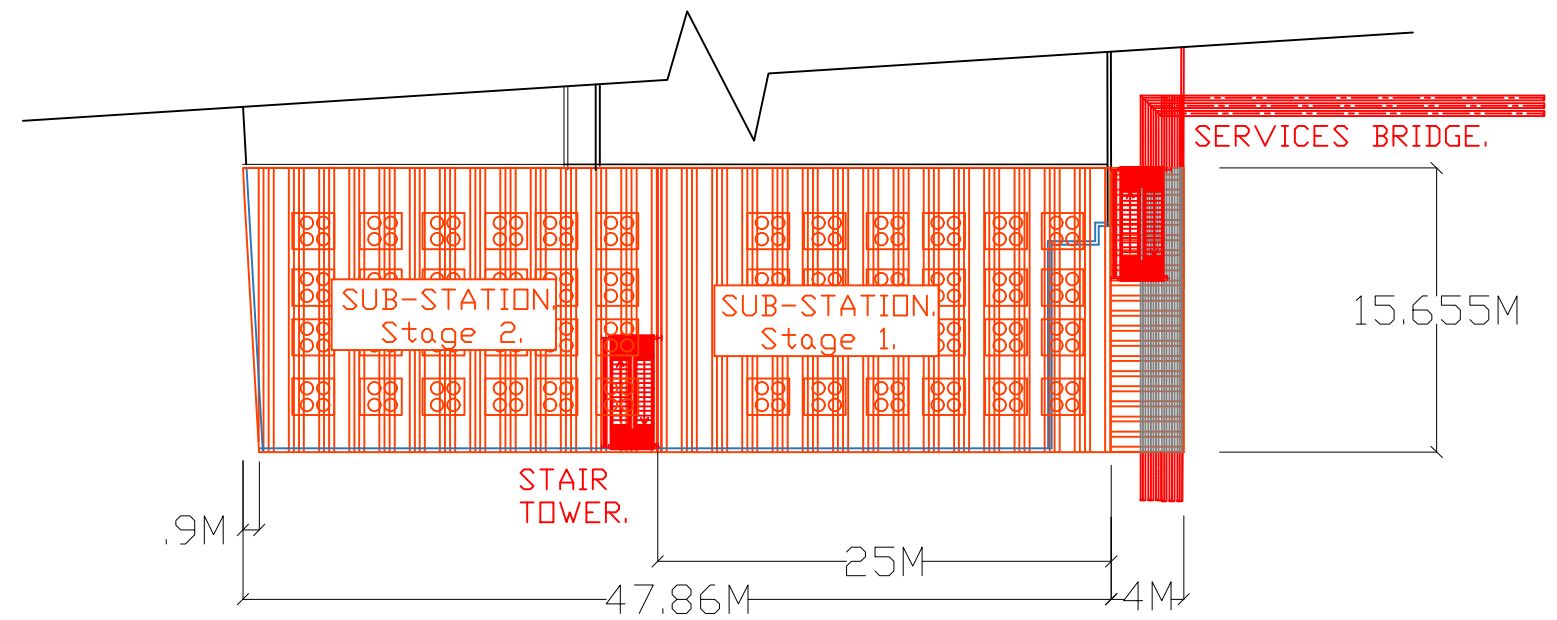
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Suriname N.

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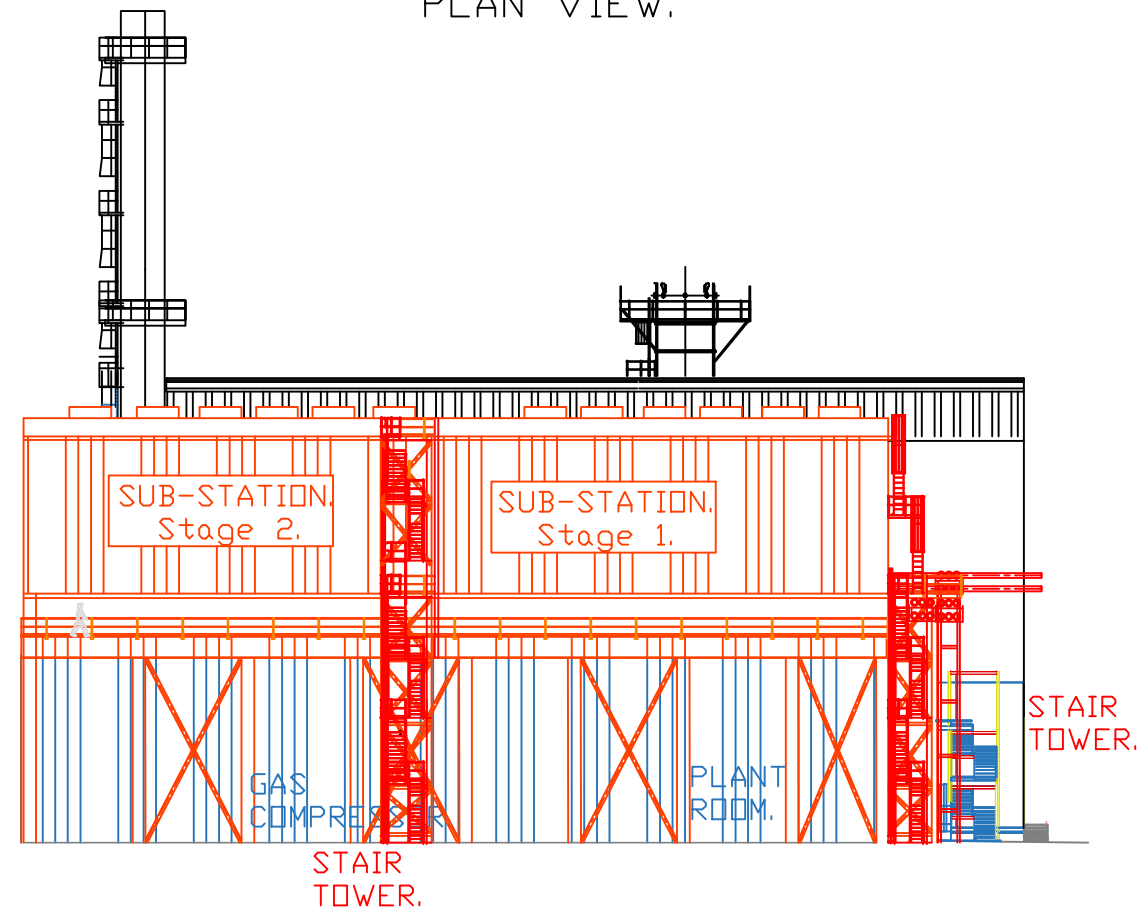
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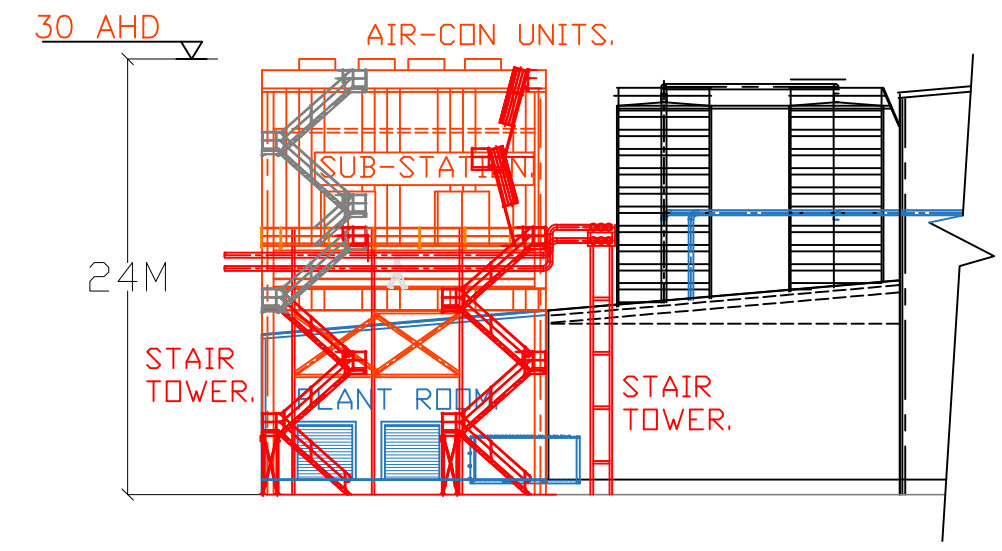


EXISTING APPROVED PLANT -BLACK.
APPROVED PLANT UNDER CONSTRUCTION -BLUE.
OR YET TO BE CONSTRUCTED -RED.
MOD 29 -RED.

PLAN VIEW.



SOUTHERN ELEVATION



EASTERN ELEVATION

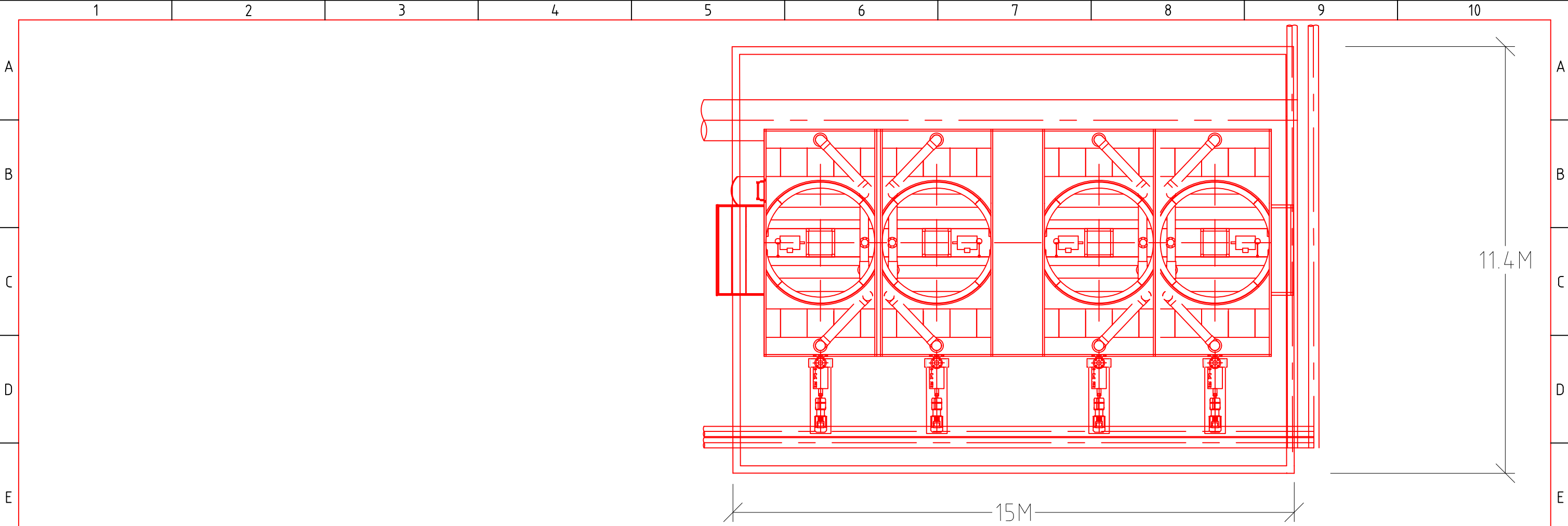
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD
PD4	ALL	Proposal scaled back.Was part of Mod 22.	P.C.	6/2/24	JS	
PD3	ALL	AHD increased.Air-con added.	P.C.	17/4/23	FT	
PD2	ALL	AHD added.	P.C.	12/12/22	B.H.	
PD1	ALL	First issue.	P.C.	27/06/22	B.H.	



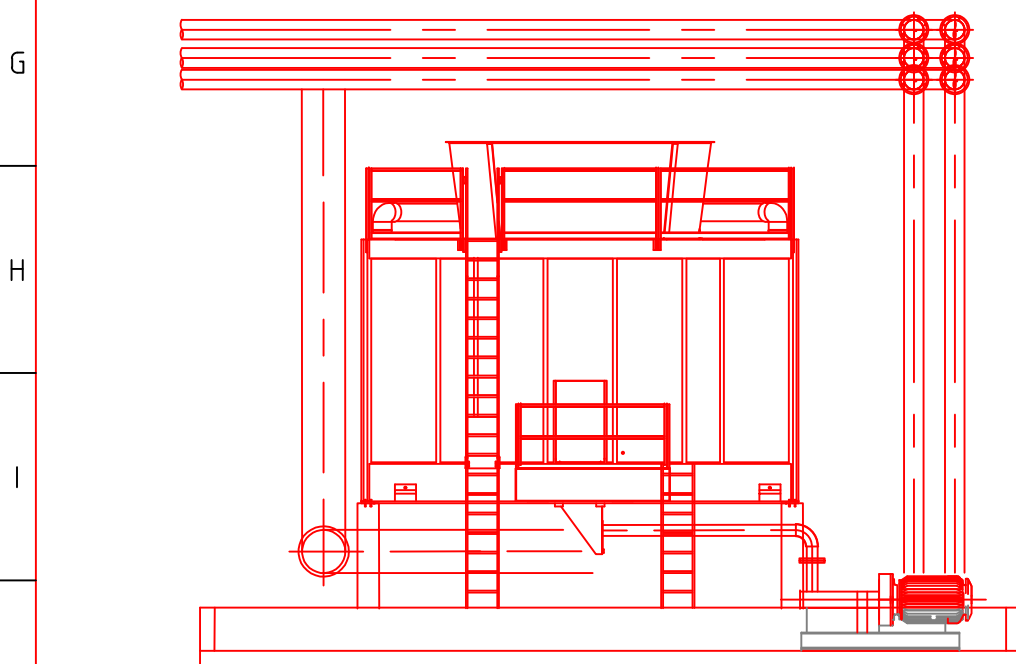
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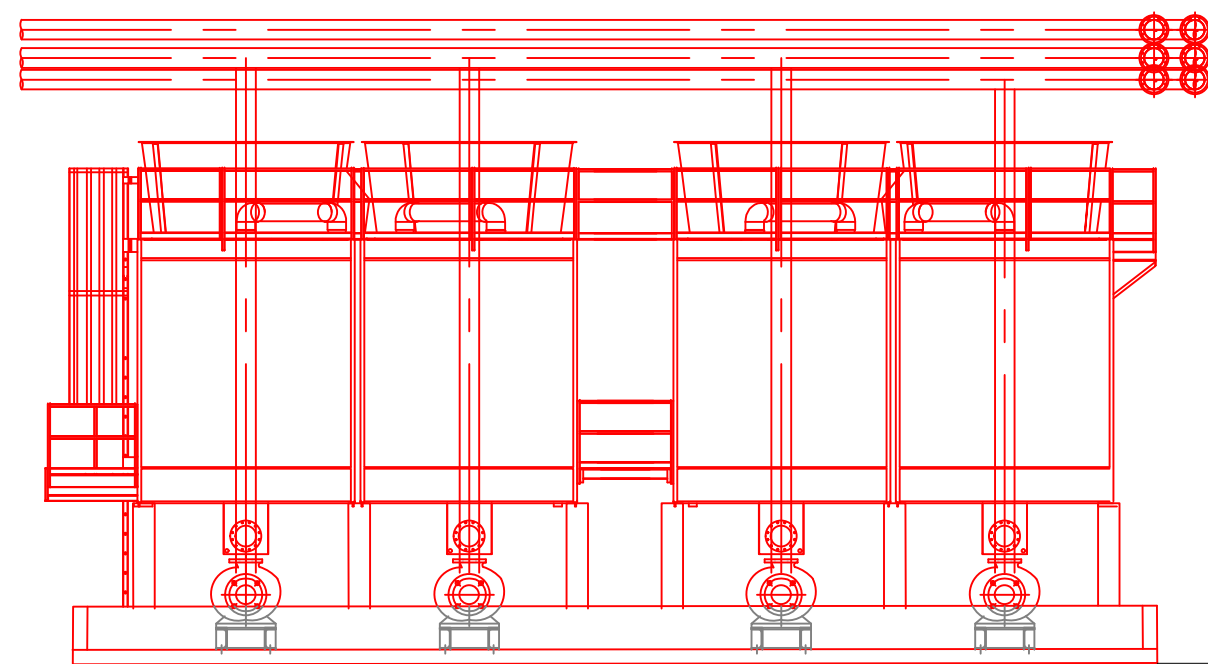
P.C.	CHKD IGOR	APPD	DATE 28/05/22	DATE	SCALE 1:400	DWG TITLE SHOALHAVEN STARCHES.BOMADERRY.NSW. MOD 29.EVAPORATOR UPGRADE. RAISED SUB-STATION.	PROJECT No. 7838	DWG No. MN7838-006	A3 REV. P04
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PLAN VIEW.



END ELEVATION.



SIDE ELEVATION.

P06	ALL	Was mod 22.	P.C.	06/2/24	J.S.	
P05	C10	Cooling tower was 10.1m wide.	P.C.	26/04/23	FT	
P04	ALL	Cooling tower model changed.	P.C.	20/04/23	FT	
P03	ALL	AHD added.	P.C.	12/12/22	J.S.	
P02	ALL	Western cooling towers now shown.	P.C.	30/11/22	J.S.	
P01	ALL	First issue.	P.C.	18/10/22	B.H.	
REV	ZONE	DETAILS	DRN	DATE	CHKD	APPD



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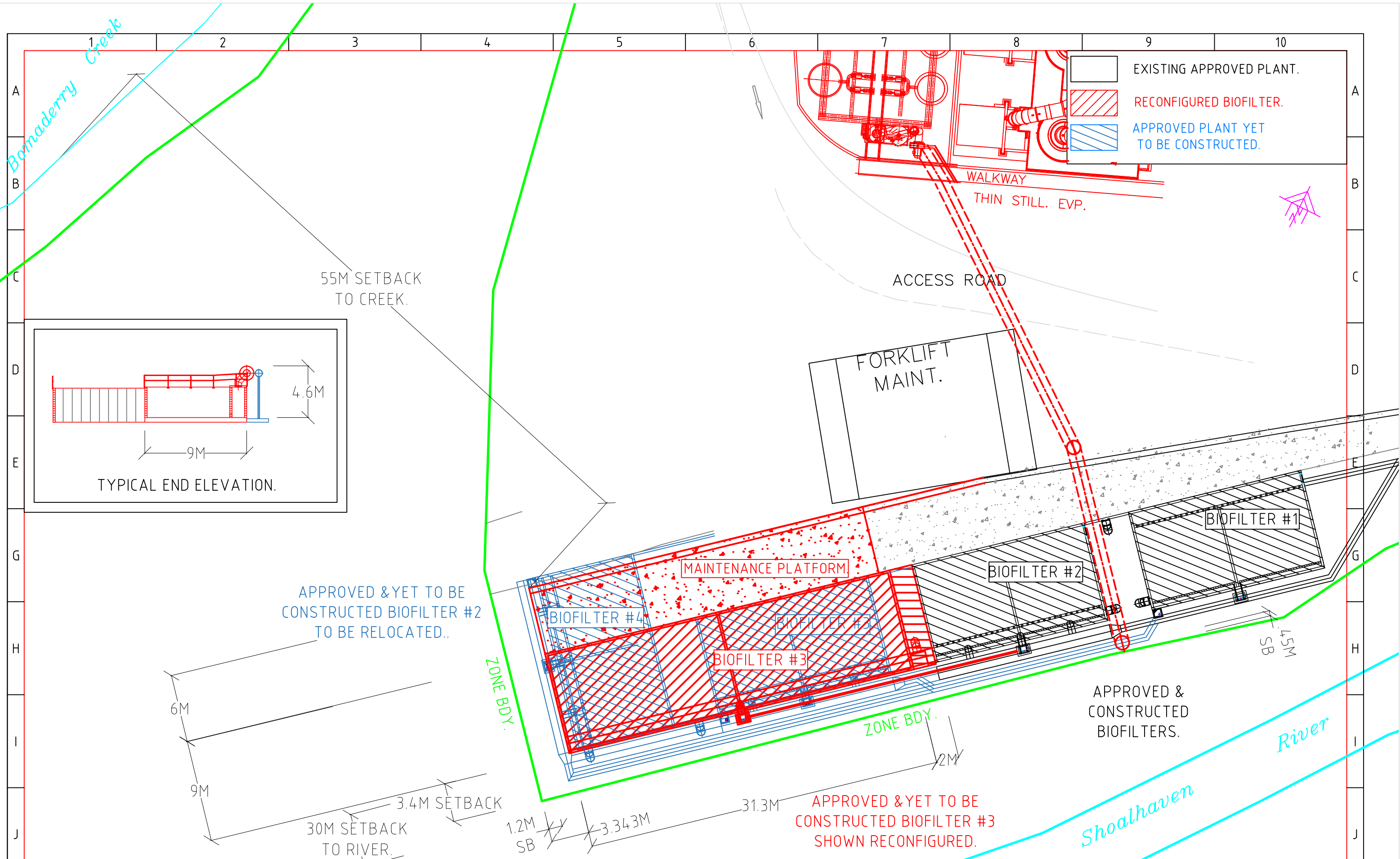


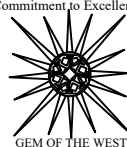
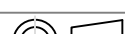
P.C.	DATE	SHOALHAVEN STARCHES.BOMADERRY.NSW.	
CHKD	18/10/22	DWG TITLE	
APPD	DATE	MOD 29.EVAPORATOR UPGRADE.	
		COOLING TOWERS GA.	
	SCALE	PROJECT No.	DWG No.
	1:100	7838A	MN7838-008

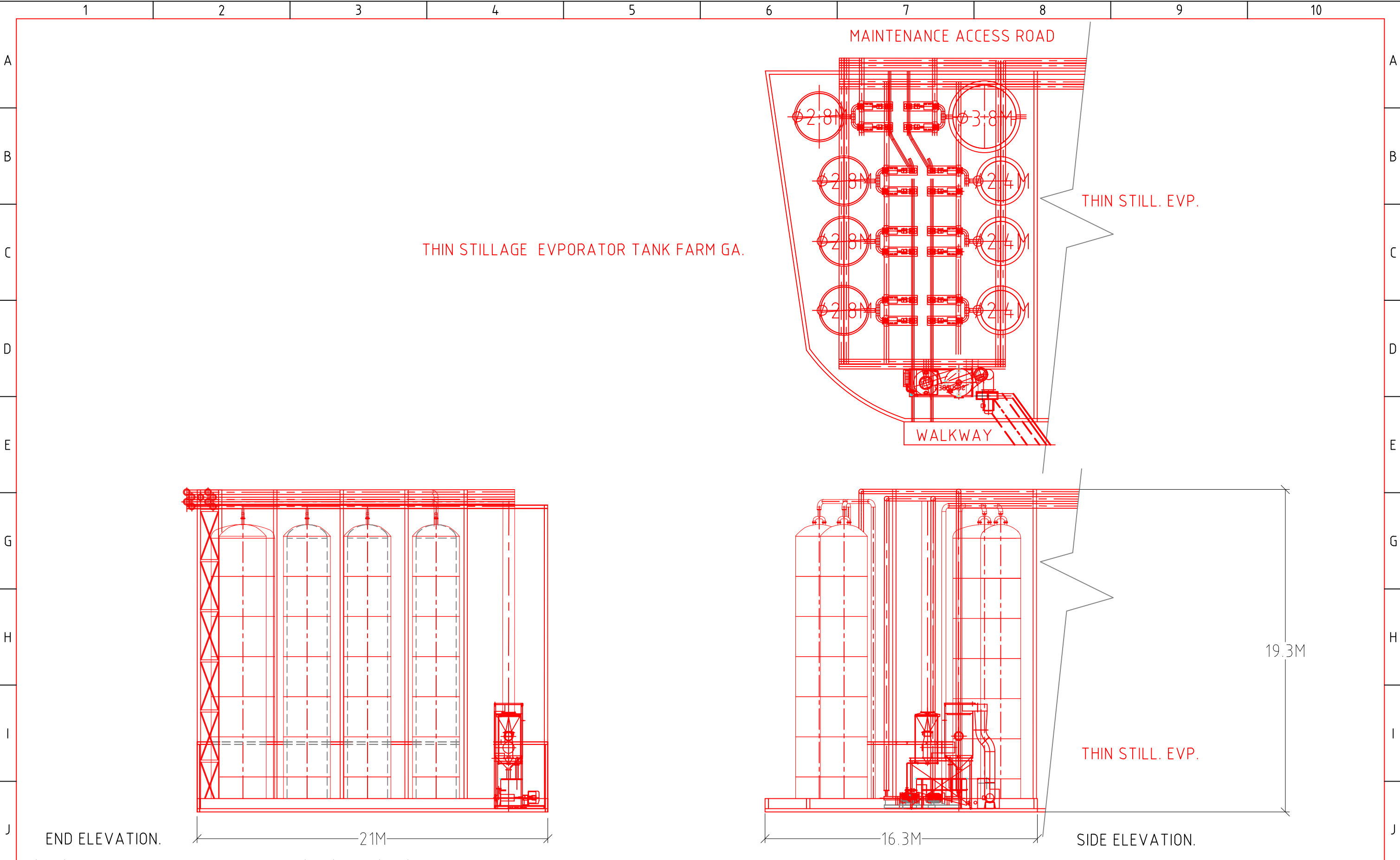
REV.

A3

P06



K	P07	ALL	Biofilter #3 relo.,evaporator & Thermal oxidiser removed.Was mod 22.	P.C.	23-02-23	JS	Commitment to Excellence  GEM OF THE WEST MANILDRA GROUP 100% AUSTRALIAN  PC Drafting. 0439 436508 Est. 2001	DRAWN	DATE	JOB TITLE	SHOALHAVEN STARCHES.BOMADERRY. NSW			SHT SIZE		
	P06	ALL	Biofilter #3 relo.Thermal oxidiser added.	P.C.	23-01-23	TC		P.C.	29/09/21	DWG TITLE	MOD 29.EVAPORATOR UPGRADE.			A3		
	P05	ALL	Approved now relocated.	P.C.	24-11-22	JS		CHKD	DATE		BIOFILTER SITE PLAN AND END ELEVATION.			REV.		
	P04	ALL	Was MN7532-013.Evaporator & fork m'tence added.	P.C.	15-11-22	BH		APPD	DATE							
	P03	ALL	Was MN7462-015.	P.C.	25-07-22	BH			SCALE	PROJECT No.	DWG No.					
	P02	ALL	Setback to creek added.Title now Mod 25.	P.C.	26-10-21	BH			1:300	7462D	MN7838-009		P07			
	P01	ALL	Layout added.	P.C.	29-9-21	PW										
REV	ZONE	DETAILS			DRN	DATE	CHKD	APPD								
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Appendix C

Environmental Complaints Handling Procedure

System Procedure

Environmental Complaints Handling



Subject	Environmental Complaints Handling	Issue date:	{issue date}
Reference No	EN-P-0010	Review date:	08/05/2025

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Subject	Environmental Complaints Handling	Issue date:	{issue date}
Reference No	EN-P-0010	Review date:	08/05/2025

1 Purpose

Effective investigation of environmental complaints.

2 Scope

All environmental complaints.

3 Specifications

Nil

4 Action on non-conformance

Compliance Manager

Environmental & Sustainability Leader

Corrective & Preventative Action Procedure ([QMS-P-0130](#))

5 Frequency

As required.

6 Reference

Flow diagram.

Environmental Complaints Fast Track System

Environment Protection Licence No. 883

7 Procedure

1. The Environmental Complaints Handling procedure must reflect the requirements of Environmental Licence No. 883, as set out in Sections M5 of the licence.
2. The Compliance Manager, Environment and Sustainability Leader and the Site Manager have ownership of the system and have authority and responsibility to ensure that necessary corrective actions are taken.
3. Environmental complaints can be received through any of the following avenues.
 - a. Environment Protection Authority (EPA)
 - b. 24 hour a day complaints hotline (call centre)
 - c. Ringing the main office.

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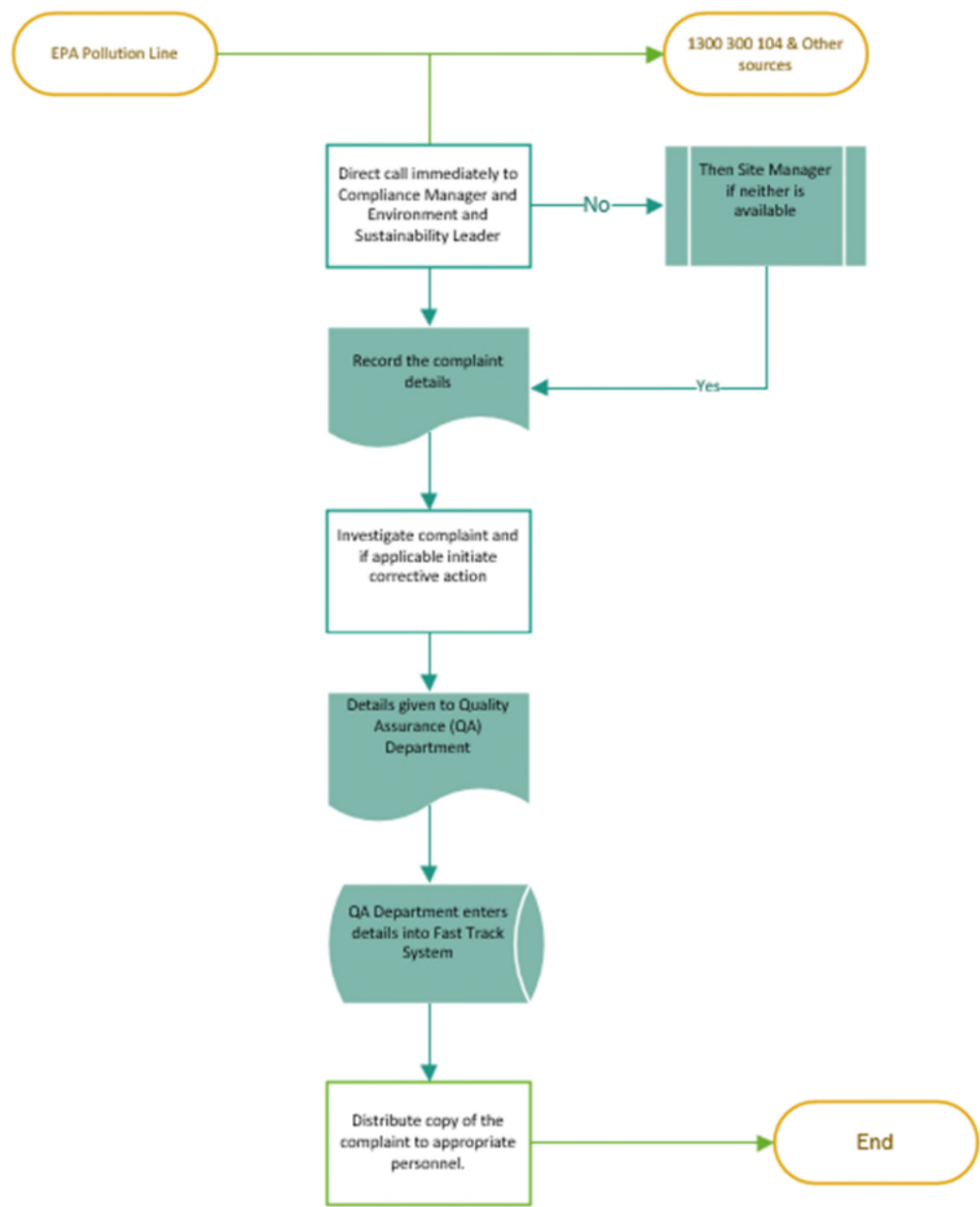
Subject	Environmental Complaints Handling	Issue date:	{issue date}
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4. The following procedure is followed when a complaint is received:
 - a. All environmental complaints must be directed immediately to the Compliance Manager or Environment and Sustainability Leader.
 - b. If the either of the above is not available, then direct to the Site Manager.
 - c. The following details are recorded (where given by the complainant):
 - i. Name of complainant and contact details (if they want to be identified). Details are required to enable Shoalhaven Starches to report back to the person once the complaint is investigated.
 - ii. Nature of complaint – noise, dust/smoke, odour, spill, incident etc.
 - iii. Duration of the problem (dates and times)
 - d. The Compliance Manager and/or Environment and Sustainability Leader then investigates the complaint and if applicable initiate's corrective action. Refer to [QMS-P-0130](#) Corrective and Preventative Action procedure.
 - e. Once the investigation is complete, the details are given to the Quality Assurance Department and the details entered into the Environmental Complaints section of the Fast Track System.
 - f. A copy of the complaint is forwarded to the Site Manager and relevant Plant Manager as required.
5. Details of complaints received by the EPA are sent to the Compliance Manager and Environment and Sustainability Leader for investigation and dealt with as per the above procedure.
6. If the complaint is the same as the one received directly by the company, then the EPA reference Number is added to the existing complaint (hence so doubling up does not occur).
7. Environmental Complaints are also reviewed on an annual basis as part of the company's Annual Environmental Report. This annual review includes comparison with previous years.

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Complaints Procedure



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