

**Shoalhaven Starches Development Consent 06_0228 Independent Odour Audit 2021 -
Response to Audit Recommendations**

Table 1 – Audit Non-compliances

Cond. No.	Condition and Requirement	Audit Report Non-compliances	Shoalhaven Starches (SS) Response	Timeframe	Status
5e	Within 3 months of the implementation of the mandatory odour controls (see Appendix 3), and annually thereafter unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Odour Audit of the project. This audit must be conducted by a suitably qualified, experienced and independent expert whose appointment has been endorsed by the Secretary. During the audit, this expert must: e. measure all key odour sources on site, and compare the results of these measurements against the predictions in the EA;	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021.	The Quarter 4 monitoring was not completed during the 2020-2021 audit period due to the unavailability of the emissions testing consultant. The EPA were notified by phone and email on 7 th May 2021 advising them of the situation. The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.		Complete Jul-21
6A(a)	The Proponent shall ensure that any Independent Odour Audit submitted to the Secretary in accordance with Condition 5 of this Schedule includes: a) 3 monthly (quarterly) odour monitoring with samples taken from the carbon dioxide/ethanol recovery scrubber inlet/s and outlet/s; and	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021.	The Quarter 4 monitoring was not completed during the 2020-2021 audit period due to the unavailability of the emissions testing consultant. The EPA were notified by phone and email on 7 th May 2021 advising them of the situation. The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.		Complete Jul-21
6A(b)	The Proponent shall ensure that any Independent Odour Audit submitted to the Secretary in accordance with Condition 5 of this Schedule includes: b. quarterly odour monitoring with samples taken of single vent stack (direct to atmosphere) emissions from a filling fermenter tank	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021.	The Quarter 4 monitoring was not completed during the 2020-2021 audit period due to the unavailability of the emissions testing consultant. The EPA were notified by phone and email on 7 th May 2021 advising them of the situation. The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.		Complete Jul-21

Cond. No.	Condition and Requirement	Audit Report Non-compliances	Shoalhaven Starches (SS) Response	Timeframe	Status
6C	The Proponent 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.	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021.	The Quarter 4 monitoring was not completed during the 2020-2021 audit period due to the unavailability of the emissions testing consultant. The EPA were notified by phone and email on 7 th May 2021 advising them of the situation. The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.		Complete Jul-21
6F	The Proponent shall conduct odour validation monitoring on the gluten dryers 3 and 4, following implementation of the mitigation controls required by Condition 3D. Results of the odour validation monitoring shall be included in the independent odour audit required under Condition 5 of Schedule 3.	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021.	The Quarter 4 monitoring was not completed during the 2020-2021 audit period due to the unavailability of the emissions testing consultant. The EPA were notified by phone and email on 7 th May 2021 advising them of the situation. The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.		Complete Jul-21

Table 2 – Audit Recommendations

Audit Reference	Audit Report Recommendations	Shoalhaven Starches (SS) Response	Timeframe	Status
20/21-REC-A	Whilst it is acknowledged that the biofilters are achieving a high degree of odour control (i.e. >90 %), the flow-weighted average odour concentration is not achieving the de-facto 500 OU standard. This matter remains an unresolved issue and it is recommended that it is resolved.	Noted. Ongoing observation will continue and remedial action undertaken as required. Odour treatment efficiency of the biofilter is used to assess its operational effectiveness in treating odorous air as opposed to setting a de-facto odour concentration standard. Over the 4 quarters during the reporting year the odour removal efficiency of Biofilter A and Biofilter B is > 90%.	-	Ongoing.
20/21-REC-B	It is noted that the Quarter 4 monitoring has not been performed during the 2020-2021 audit period, due to limited availability of the emissions testing time, as advised by Manildra to EPA by email on 7 May 2021. It is recommended that the testing programme is restarted as soon as practicable.	The Quarter 1 (2021-22) odour monitoring was conducted on 7 th & 8 th June and 20 & 22 July 2021.	-	Complete Jul-21

20/21- REC-C	It is recommended that a source apportionment study is completed as a component of the next odour modelling performed, to further understand the relationship between emission rates and the relative contribution of sources to aggregated off-site impacts.	A suitably qualified consultant will be engaged to complete the study.	Sep-2022	Incomplete
20/21- REC-D	It is recommended that a summary is provided to NSW EPA at the earliest convenience that provides clarification on the respective odour controls implemented across the site.	A summary will be provided to the EPA.	Dec-2021	Incomplete