



Our reference: FIL08/6074:DOC12/48227:GN
Contact: Greg Newman, (02) 4224 4100

Department of Planning
Major Developments Assessment Unit
(Attention: Ms Ashley Cheong)
GPO Box 39
SYDNEY NSW 2001

Dear Madam

MODIFICATION TO SOYBEAN PROCESSING AND BIODIESEL PROJECT, PORT KEMBLA (08 0083)

I am writing in response to your letter to the Environment Protection Authority (EPA) dated 15 November 2012 (reference S07/1112) inviting a submission on the proposed modification to the above Project Approval.

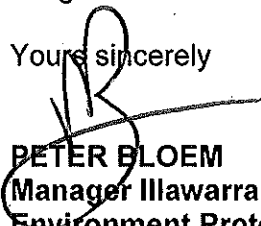
Odour and dust are key environmental issues in the Port Kembla and Coniston areas and it is important these impacts are properly assessed and managed. The existing project approval for the development includes the following specific conditions in regard to odour and dust control:

- The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the Protection of the Environment Operations Act 1997.
- The Proponent shall implement all reasonable and feasible measures to minimise the dust generated by the project.

The EPA has reviewed the document titled *Soybean Processing and Biodiesel Production Facility, November 2012*. Before the EPA can determine whether any modified or additional environmental requirements are needed for the project approval, the EPA requests additional information on the proposed modification to fully understand the modification and adequately demonstrate that the above existing project approval conditions can be satisfied at all times. This additional information is outlined in the attachment to this letter (**Attachment A**). It relates to the *Importation of biodiesel – liquid bulk unloading facility* and to a lesser extent the *soybean truck dumping facility*. It is unclear how these components of the modified project may contribute to odour and dust emissions and the nature and effectiveness of the environmental controls proposed to address them.

The EPA is happy to meet with Department of Planning and Infrastructure and the Proponent to discuss these matters at a mutually convenient time if required. If you have any questions, please contact Greg Newman on the above number.

Yours sincerely


PETER BLOEM
Manager Illawarra
Environment Protection Authority

3/3/12

Att: Additional Information Required

(N:\2012\PLANNING\GN DOC12-48227 BIODIESEL MODFN)

Attachment A

Request for Additional Information

1. Scale of biodiesel importation

No detail is provided on the liquid bulk unloading facility nor is it considered in the air assessment. Environment Protection Authority (EPA) is unclear on the proposed commencement dates of the biodiesel importation and the intended scale and duration of this practice. That is, when will imports commence, how long will it continue (prior to soybean importation and refining), and what is the annual throughput.

2. Environmental Controls for Odour and Dust

The new biodiesel unloading process and truck unloading station are not modelled in the air impact assessment. Further detail is requested (i – ii) on these operations.

- i. Biodiesel unloading and storage - EPA is unclear on the environmental controls proposed for biodiesel unloading and storage as well as soybean storage. Vapour recovery is very briefly mentioned on page 43 but no detail is provided on its application. EPA requests details on what environmental controls will be applied to the biodiesel bulk unloading, the biodiesel transfer to the storage tanks, the storage tanks, and during truck loading for distribution. Further, the proposal refers to desiccant breathers on the soybean storage tanks. The EPA requests further detail on how these devices will control odour.
- ii. Truck unloading dump station - No detail is provided on the truck unloading dump station controls. The EPA requests details on the controls for soybean dust and odour from this location.