

30 March 2026

Rasmus Altenkamp
Planning Officer
Department of Planning, Housing and Infrastructure

Via: Major Projects Planning portal

**Installation of Heat Recovery Equipment - Mod 33
Shoalhaven Starches Pty Ltd - Bomaderry – MP06_0228-Mod-33**

Dear Rasmus,

I refer to your email and supporting documentation to the Environment Protection Authority (EPA) on 18 March 2026, seeking comment on the response to submissions on the above development application by Shoalhaven Starches Pty Ltd (Starches).

The application proposes to construct heat recovery equipment to recover waste heat from DDG Dryer No.4 and DDG Dryer No.5 at the existing facility at Bolong Road, Bomaderry.

The EPA regulates the activities at the premises through Environment Protection Licence (EPL) Number 883.

The EPA has undertaken a review of the RtS document titled “*Summary of noise and vibration impacts associated with modification 33*” (GHD dated 16 March 2026 – The Submission) and provides comments in **Attachment A** relating to noise to assist the Department of Planning, Housing and Infrastructure (DPHI) in its assessment of the proposal.

If you have any questions about this request, please contact Matthew Fuller via email at info@epa.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J. Boyle', written in a cursive style.

JAMES BOYLE
Unit Head - Regulation
NSW Environment Protection Authority

(Attachment – Attachment A)

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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ATTACHMENT A

EPA Comments on Noise

Modification 33 (Mod 33) includes proposed changes to the DDG Dryers 4 and 5 heat recovery system and forms part of the larger heat recovery works proposed under Modification 31. As noted in the EPA's previous response Appendix E of the "*Pollution Reduction Program Noise Compliance Investigation*" report (required by condition U4 of the EPL, dated 30 April 2025) indicates that mitigation of 20 dBA is required to the DDG4-5 source group to achieve EPL noise limits.

The EPA has previously advised Shoalhaven Starches that future modifications should seek to achieve a reduction better-than the noise limits and to include mitigation to reduce existing noise levels wherever possible. We consider that a modification/works to DDG Dryers 4 and 5, as is proposed by Mod 33, is the ideal opportunity to include mitigation as per the Pollution Reduction Program (Condition U4) and should form part of the expected outcomes of the Mod 33 project.

The Submission advises that:

- Most of the noise from DDG Dryers 4 and 5 is emitted via the large openings in the eastern facade of the buildings.
- Identifies additional noise mitigation measures to DDG Dryers 4 and 5, including lagging of vapour fan casing and connecting pipework and alternative valving to the scrubber tank pump. These measures are predicted to achieve a 3dBA reduction from the DDG Dryers 4 and 5 building openings.
- Once Mod 33 is operational the cooling demand for the DDG Dryers 4 and 5 process will be reduced, resulting in cooling tower noise reductions of 4 dBA.

As the "*Pollution Reduction Program Noise Compliance Investigation*" report (required by condition U4) identified a required reduction of 20dB, the EPA considers that further noise mitigation works to the DDG Dryers 4 and 5 buildings than those identified in the Submission would be warranted. It would appear that the most effective way to achieve a substantial reduction in noise from the DDG Dryers 4 and 5 buildings would be the enclosure (or at least partial enclosure) of the large openings in the eastern facades. The EPA considers the investigation of adoption these additional mitigation measures should be considered.

Should additional mitigation measures not be deemed feasible due to engineering reasons, DPHI may want to facilitate an independent peer review of the Mod 33 submission documentation, to assess whether adequate noise reduction controls have been considered by the proponent.