

28 April 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 15 April 2026, seeking comment on the response to submissions (RtS) 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 “*Response to issues raised by EPA*” (AllenPrice dated 14 April 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 blue ink, appearing to read 'P. Bloem', is positioned above the printed name of Peter Bloem.

PETER BLOEM
Manager - 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 approximately 20 dBA is required to the DDG Dryers 4 and 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. The modification/works to DDG Dryers 4 and 5, under Mod 33 provides an ideal opportunity to include mitigation as per the Pollution Reduction Program (Condition U4) and this should form part of the expected outcomes of the Mod 33 project.

In our previous response (dated 30 March 2026) the EPA requested consideration be given to the investigation of additional noise mitigation measures such as the enclosure (or at least partial enclosure) of the large openings in the eastern facades the DDG Dryers 4 and 5 buildings.

The RtS 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 two mitigation scenarios, Mitigation 1 (proposed) and Mitigation 2 (enclosure of the eastern facades – not proposed and not considered reasonable and feasible).
- Identifies additional noise mitigation measures to DDG Dryers 4 and 5 in Mitigation 1, including lagging of vapour fan casing and connecting pipework and alternative valving to the scrubber tank pump. These measures are predicted to achieve a 3 dBA reduction from the DDG Dryers 4 and 5 building openings.
- That there would be engineering and operational constraints when considering enclosure of the DDG 4 and 5 buildings, requiring a "large-scale mechanical ventilation system" that "would introduce additional engineering requirements including the installation of high-capacity ventilation fans and ducting, increased ongoing energy demand, higher maintenance obligations, potential new failure points, and the need to integrate ventilation systems with existing process safety controls".
- That there would be "ongoing operational costs associated with running mechanical ventilation systems" which "would further increase the long-term financial burden of this option".
- 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.

Following a review of the RtS the EPA provides the following advice:

- The "*Pollution Reduction Program Noise Compliance Investigation*" report (required by condition U4) identified a required reduction of 20dB to the DDG Dryers 4 and 5 buildings to achieve EPL noise limits.
- That further noise mitigation works to the DDG Dryers 4 and 5 buildings than those identified in Mitigation 1 in the Submission are required to achieve compliance with the EPL noise limits.

- There is a significant difference between the predicted noise reductions under Mitigation 1 and 2 scenarios for the single source noise reduction at Receiver 7 (nominated as the most impacted receiver due to DDG Dryer 4 & 5 noise).
- The predicted noise reduction from Mitigation 1 is stated to be up to 3 dBA and up to 23 dBA for Mitigation 2 by enclosing the open eastern façades. It is also stated that these measures will have a 0.13 dBA and 0.26 dBA contribution respectively to the overall site mitigation and therefore the Mitigation 2 measures “are not considered reasonable or feasible”. The EPA does not consider it appropriate to determine the reasonableness of potential mitigation reduction from one or two sources by comparing it to the reduction of noise from hundreds of noise sources at the Shoalhaven Starches site, especially given the extent of the site’s exceedance of the EPL noise limits. Meaningful overall reductions in existing site noise will come from continuing to mitigate individual existing items or processes and avoiding or minimising the introduction of additional new noise sources that will undermine the benefits of that mitigation.
- Consideration of comparisons to site-wide noise reductions at this early stage of the “*Pollution Reduction Program Noise Compliance Investigation*” PRP process is not appropriate. The site-wide noise levels informed the commencement of the PRP (and are considerably over the EPL noise limits) but in this early stage of the PRP the focus should be on single source (or groups of sources e.g. a building) reductions. There will be limited change to the site-wide noise levels until numerous additional single-source noise mitigation projects are implemented, as there are potentially hundreds of noise sources.
- Should additional mitigation measures not be deemed feasible on engineering or other technical grounds, the EPA should be advised and may provide additional comments in discussion with DPHI and Starches.