



DOC22/57975-16

Ms Deana Burn
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Dear Ms Burn

**Shoalhaven Starches – MP06_0228 Mod 23 – Gas Fired Co-generation Plant – EPA
Comments on Further Revised NIA**

Thank you for the request for advice, seeking the review by the NSW Environment Protection Authority (EPA) of the further revised Noise Impact Assessment (NIA) for the proposed modification (MP06_0228-Mod-23) at 160 Bolong Road, Bomaderry.

The EPA has reviewed the following documents prepared by the applicant in response to EPA's comments on the proposed modification dated 25 February 2022:

- *Modification 23 to Shoalhaven Starches Expansion Project 06_0228. Additional Information Request (Feb 2022) – Environmental Noise Assessment* – Harwood Acoustics Acoustical Consulting – 16 March 2022.
- *Environmental Noise Assessment Shoalhaven Starches – Proposed Modification to Shoalhaven Starches Expansion Project 06_0228 – Proposed Modification to Approved Cogeneration Plant – Modification 23* – Harwood Acoustics Acoustical Consulting – 16 March 2022.

The EPA has reviewed the documents and has found that the further revised NIA indicates that there may be a potential risk of non-compliance with the Environment Protection Licence No. 883 noise limits at sensitive receivers. In this regard it is recommended that should the proposed modification be approved, conditions for the modification include the requirement to conduct a compliance noise assessment post-construction of the modified plant to validate the NIA's assessment and predications.

The EPA further advises that should the proposal be approved; it is the EPA's expectation that the modification will comply with the current noise limits on the licence. Should a post-construction compliance assessment determine that these limits are exceeded, it is the EPA's expectation is that Shoalhaven Starches will implement all reasonable and feasible noise measures to return compliance with the licence noise limits as a priority.

Attachment A to this letter contains further detail on these issues.

If you have any questions or wish to discuss, please contact myself or Amanda Fletcher on (02) 6229 7002.

Yours sincerely

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Attachment A

Matters to be addressed with conditions

Summary of issues

Based on the contour maps in Appendices A to G, it appears that the 4 receiver locations chosen for the assessment are potentially **not** the most-affected receiver locations. It also appears that the 3D modelling has only been undertaken for the Cogeneration Plant, which is just one portion of the proposed Mod 23. The relocated DDG dryers and cooling towers have not been included in the model. Table 9 in the further revised NIA indicates under noise-enhancing meteorological conditions there is a 1 dBA exceedance of design goal for the Cogeneration Plant alone. As such the EPA advises there is a potential risk of exceedance of the licence noise limits.

In this regard, the EPA advises it will be critical that the design and construction of the modified plant meets the design measures and construction material requirements to satisfy the noise performance requirements outlined in the acoustic report *Proposed Modification to Shoalhaven Starches Expansion Project 06_0228 – Proposed Modification to Approved Cogeneration Plant – Modification 23. Environmental Noise Assessment* (by Harwood Acoustics ref: 2103012E-R Rev B, dated 16 March 2022).

The EPA advises Department of Planning and Environment consider suitable conditions be included in any modified consent, if approved, to ensure that the performance of the modified plant meets these requirements. Suitable conditions could be framed along the following lines of:

- Plans and specifications supporting an application for a Construction Certificate shall:
 - detail the design measures and construction materials required to satisfy the noise performance requirements;
 - be endorsed by a person who is appropriately qualified and experienced in acoustics; and
 - confirm that the performance objectives of the noise assessment will be achieved by the works outlined in the submitted plans and specifications.
- An Occupation Certificate for the works shall not be issued without confirmation from a person who is appropriately qualified and experienced in acoustics that the works have been designed and constructed, and capable of being operated in a manner that satisfies the design objectives.

The EPA advises that:

- No change is made to consent regarding the existing noise conditions in EPL 883.
- Consideration be given to conditions within a planning consent ensuring that the performance of the modification meets acoustic design measures and construction material requirements.

The EPA recommends that:

- If approved, any conditions for the modification require the proponent to conduct a compliance noise assessment post-operation of the modified plant that confirms that the cumulative noise level from the modified plant and the existing plant does not exceed the noise limits for the entire premises. If exceedances of the noise limits are identified, the compliance report must identify feasible and reasonable noise mitigation measures, together with timeframes for implementation to achieve compliance.

Minor matters

Construction

The EPA is satisfied with the additional information on construction provided in the further revised NIA.