

21 January 2026

Catriona Shirley
Team Leader
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 Catriona,

I refer to your email and supporting documentation to the Environment Protection Authority (EPA) on 18 November 2025, and additional information on 9 December 2025, seeking comment 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 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 'Peter Bloem', with a stylized flourish at the end.

PETER BLOEM
Manager - Regulation
NSW Environment Protection Authority

(Attachment – Attachment A)

ATTACHMENT A

EPA Comments on Noise

The supporting documentation indicates that Modification 33 forms part of the larger heat recovery works proposed under Modification 31. In providing these comments EPA has considered the following reports: *Summary of noise and vibration impacts associated with modification 33* (by GDH, dated 29 August 2025) and the relevant sections of *Shoalhaven Starches Modification 31 Noise and Vibration Impact Assessment* (by GDH, dated 26 August 2025) for Modification 33.

Modification 33 includes proposed changes to the DDG Dryers 4 and 5 heat recovery system. While the predicted noise levels in the *Noise and Vibration Impact Assessment* for Modification 31 (section 6.2.2.1) state that the noise from the proposed amended heat recovery system will be 1 dBA or more lower than the design goal of the EPL 883 noise limit minus 15 dBA, 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 (see following extract of Appendix E below – see item “30” for relevant data).

Number	Source description	Source group	Source type	At-source mitigation scenario 1		At-source mitigation scenario 2 Reduction required to achieve EPL noise limits (dB)
				Required reduction (dB)	Considered mitigation option	
1	CT Fan Ethanol-CT Ethanol fan	CT Ethanol	Area	10	CT fan reduction	30
2	CT Distillery-CT Distillery fan	CT Distillery	Area	10	CT fan reduction	25
3	CT Eastern Evaporators-CT Eastern evaporator Louvre	CT Eastern Evaporator	Area	15	CT Fan reduction + acoustic louvres	20
4	Cooling tower Distillery-CT Distillery louvres	CT Distillery	Area	15	CT Fan reduction + acoustic louvres	25
5	CT Eastern Evaporators-CT Eastern evaporator Fan	CT Eastern Evaporator	Area	10	CT fan reduction	20
6	CT Ethanol-CT Ethanol louvre	CT Ethanol	Area	15	CT Fan reduction + acoustic louvres	20
7	CT Ethanol-CT Ethanol side wall	CT Ethanol	Area	5	CT fan reduction	15
8	CT Fan Glucose-CT Glucose fan	CT Ethanol	Area	10	CT fan reduction	20
9	SD5 roof sources	SD5	Area			15
10	Beverage grade 5/6-Beverage grade 5/6 GF roof	Distillery	Area	10	Enclosure	20
11	Dryer 1 outlet-Dryer 1 outlet sidewall	GD1-4	Area	10	Insulation	15
12	Dryer 1 outlet-Dryer 1 outlet	GD1-4	Area			10
13	DS037 Valve pressure release east of control room	Distillery	Point	10	Silencer	10
14	Dryer 2 outlet-Dryer 2 outlet sidewalls	GD1-4	Area	10	Insulation	10
15	DS038 Fermenter tank agitator TAM44	Fermenter Tanks	Point			10
16	EV051 E980 3rd stage circulation pump ULM005	New evaporator	Point			10
17	GD6 dry exhaust stack-GD6 dry exhaust stack outlet	GD6	Area	15	Silencer	20
18	GD6 exhaust stack-GD6 dry exhaust stack outlet	GD6	Area	15	Silencer	15
19	CT007F - Cooling tower Distillery water pump	CT Distillery	Point	15	Enclosure	15
20	FM005G - Mill B exhaust	Flour Mill	Point	15	Silencer	10
21	Boiler 8 (copy of Boiler 7)-Facade 02	BoilerHouse	Area			10
22	Dryer 4 outlet-Dryer 4 outlet sidewall	GD1-4	Area	10	Insulation	10
23	FM005A - Mill B exhaust	Flour Mill	Point	15	Silencer	15
24	MS002 - forklift movements container handling area	MobileSources	Area			25
25	Cooling tower Distillery-CT facades E	CT Distillery	Area	5	CT fan reduction	10
26	FM005C - Mill B exhaust	Flour Mill	Point	15	Silencer	15
27	CT Eastern Evaporators-Evaporator cooling towers W	CT Eastern Evaporator	Area	5	CT fan reduction	10
28	Boiler 8 stack-Stack body	BoilerHouse	Area			5
29	DDG3-DDG3 opening east top half	DDG1-3	Area			15
30	DDG5-DDG008 - East facade (open)	DDG4-5	Area			20
31	Distillery cooling tower-Distillery cooling tower louvre	Distillery	Area			15
32	FM005H - Mill B exhaust	Flour Mill	Point	15	Silencer	10
33	Distillery cooling tower-Distillery cooling tower	Distillery	Area			15
34	FM005I - Mill B exhaust	Flour Mill	Point	15	Silencer	10
35	Boiler 6 (copy of Boiler 7)-Facade 04	BoilerHouse	Area			15
36	CT Eastern Evaporators-Evaporator cooling towers E	CT Eastern Evaporator	Area	5	CT fan reduction	5
37	FM005D - Mill B exhaust	Flour Mill	Point	15	Silencer	15
38	Dryer 4 outlet-Dryer 4 outlet	GD1-4	Area			10
39	Boiler 8 (copy of Boiler 7)-Facade 04	BoilerHouse	Area			10
40	FM005B - Mill B exhaust	Flour Mill	Point	15	Silencer	15
41	MS003 - truck movements to DDG loader	MobileSources	Line			15
42	Cogen-Cogen Louvre	Cogen	Area			10
43	Boiler 8 (copy of Boiler 7)-Facade 01	BoilerHouse	Area			5
44	Dryer 2 outlet-Dryer 2 outlet	GD1-4	Area			10
45	Boiler 8 (copy of Boiler 7)-Roof 01	BoilerHouse	Area			10
46	Decanter 5-Opening north	DDG1-3	Area	10	Close doors	10
47	Dryer 4-GD133	GD1-4	Area			10
48	SD5-Roof	SD5	Area			10
49	Glucose cooling tower-CT Glucose Louvre	Glucose_CTs	Area	15	CT Fan reduction + acoustic louvres	15
50	Compressor house-Compressor House N	CompressorHouse	Area			15
51	Cooling tower for Cooling tower fan	Distillery	Area	10	CT fan reduction	15

Copy of the relevant section of the Table in Appendix E “*Pollution Reduction Program Noise Compliance Investigation*”.

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 Modification 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 Modification 33 project.

The “*Site Wide Noise Model*” report by Day Design (dated 12 December 2023), indicated in Table 10 that the internal noise level of the DDG Dryer 4-5 building is currently 86 dBA. The modification report (Modification 31 dated 26 August 2025) for the DDG Dryer 4-5 heat recovery system states that the proposed internal noise levels will be limited to 89 dBA (Table 6.2). This is an increase in the existing source noise level, which adds further weight to the importance of including mitigation to the DDG Dryer 4-5 building and associated sources.