

14/10/2025

AP Ref: 131401

DPHI Ref: MP06_0228-Mod-30

RESPONSE TO REQUEST FOR INFORMATION SHOALHAVEN STARCHES EXPANSION PROJECT (MP06_0228-MOD-30)

We refer to the Department's request for information (RFI) dated 2 October 2025; and which itself references the advice from the EPA dated 7 August 2025, relating to the above Modification Proposal. The Department's RFI requested further information to address the EPA's outstanding matters relating to wastewater and air quality. We have reviewed and respond to the issues raised in the RFI outlined in the Departments letter as follows:

WASTEWATER

The EPA's advice includes the following comments in terms of wastewater management:

Wastewater management

The Modification Report states the proposal will not increase wastewater directed to the existing wastewater treatment plant (WWTP), nor change any discharge arrangements or involve any additional wastewater management or mitigation measures.

However, the process flow diagram of the CO₂ plant (p25 Modification Report) and information provided indicates potential of wastewater being generated from, a number of sources, including the cold scrubber, CO₂ compressor, CatOx unit, CO₂ liquefier and ammonia receiver.

Recommendation: *The Modification Report should confirm the expected volume of wastewater to be generated by the additional CO₂ plant and capacity of the existing WWTP to accommodate the additional volume. This should include details of the capacity of the existing WWTP and current and approved wastewater volumes from the development site.*

Response

In a written submission prepared by the Manildra Group dated 3rd September 2025 and previously supplied to the Department, it was indicated that the expected increase in wastewater volume generated by the additional CO₂ plant is 27 KL per day which represents 0.2% increase in the current wastewater flows to the WWTP (about 11,000KL per day).

The existing Shoalhaven Starches WWTP capacity has a design flow rate of 9000 – 12,800 KL per day.

Manildra also advised that the organic loading rates (BOD & COD), the wastewater streams from the CO₂ plant have only trace amounts of organic compounds and therefore any organic loading rate increases to the existing WWTP is anticipated to be negligible.



Further, Manildra have subsequently advised that there are no additional wastewater loads associated with any recent approved, but yet to be constructed developments, at the site.

AIR QUALITY

The EPA's advice includes the following comments in terms of air quality:

Air quality

The Preliminary Hazard Analysis (PHA – p 22) indicates the storage tank will have vents for ammonia and CO₂. There do not appear to be addressed as emission sources in the Air Quality Imp[act Assessment (AQIA).

Recommendation: The AQIA should address the like emissions and potential impacts from venting of ammonia associated with the proposal. An estimate of CO₂ to be vented should also be provided.

Response

Attached to this submission is a revised Air Quality Assessment prepared by GHD which incorporates emission rates of CO₂ and ammonia as requested by the EPA.

Allen Price trusts that the responses provided are sufficient to enable the Department to finalise the assessment of this application. We now await its decision in due course. Should you require any further information regarding this request, please do not hesitate to contact us.

Yours faithfully

Allen Price Pty Ltd

ATTACHMENTS

- Revised Air Quality Assessment prepared by GHD dated 13 October 2025