



## Environment, Climate Change & Water

Your reference: S06/00614  
Our reference: DOC11/14503, FIL07/10559  
Contact: Stefan Press, (02) 6229 7002

Mr Chris Ritchie  
Manager – Industry  
Major Project Assessment  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms Jodie Leeds

28 March 2011

Dear Ms Leeds

**RE: Shoalhaven Starches Pty Ltd – Modification of MP06\_00228 (Mod1) – Removal of DDG Pelletising Plant from Mandatory Odour Controls.**

I refer to your letter dated 15 March 2011 in relation to a proposal by Shoalhaven Starches Pty Ltd to modify project approval MP06\_0228, which provides for the staged expansion of ethanol production up to a maximum of 300 megalitres per annum at its factory located at 160 Bolong Road, Bomaderry ("the premises").

Specifically, the Department of Environment, Climate Change & Water (DECCW) understands that the proposed modification seeks to remove the requirement to install the Dried Distillers Grain (DDG) pelletising plant from the mandatory odour controls requirement of condition 7(1)(a) of project approval MP06\_0228. The proposed modifications were set out in a letter from Shoalhaven Starches Pty Ltd to the Department of Planning (dated 23 December 2010) and attached to your letter.

DECCW understands that Shoalhaven Starches Pty Ltd is proposing to undertake the following works at the premises in lieu of pelletising the DDG product, in order to reduce odour emissions:

1. Direct all air emissions from the Palmer Cooler stack to a boiler for odour destruction; and
2. Extend the length of the existing DDG product load out awning, install motorised roller doors to each entry end and fit Moduflex Bellows Feeders chutes for loading DDG product with a fugitive dust extraction arrangement that directs air captured during loading operations to the biofilter for odour treatment.

DECCW has no objections to the proposed modifications provided that appropriate conditions are put in place as part of any approval requiring the abovementioned works be undertaken by Shoalhaven Starches Pty Ltd at the premises. As this proposal is to modify Stage 1 odour

controls, that were required to be installed prior to DoP approval for progression to the expansion of ethanol production (Stage 2), DECCW recommends that the same requirements, in terms of Stage 2 approval, should apply to these modified odour controls.

Should you wish to discuss this matter further, please contact either Stefan Press or me on 6229 7002.

Yours sincerely



**JULIAN THOMPSON**  
**Unit Head – South East Region**  
**Environment Protection and Regulation Group**

Cc. Mr Ming Leung  
Shoalhaven Starches Pty Ltd

## David Mooney - RE: Shoalhaven Starches Expansion Project, Modification proposal

---

**From:** Ronan Kellaghan <ronan.kellaghan@paeholmes.com>  
**To:** David Mooney <David.Mooney@planning.nsw.gov.au>  
**Date:** 23/05/2011 18:57  
**Subject:** RE: Shoalhaven Starches Expansion Project, Modification proposal

---

Hi David,

In that context it makes sense. I think if they do progress to the pelletiser plant and keep the the existing proposed controls at the load out area, there shouldnt be any odour issue.....but it make sense for them to have to demonstrate that this is the case.

Rgds,  
 Ronan

---

**From:** David Mooney [David.Mooney@planning.nsw.gov.au]  
**Sent:** Monday, 23 May 2011 11:10 AM  
**To:** Ronan Kellaghan  
**Subject:** RE: Shoalhaven Starches Expansion Project, Modification proposal

Thanks for your feedback Ronan,

The Proponent suggested that they would like to keep the option to install the DDG pelletiser in the future so we moved it from the mandatory controls to the additional controls and added 3B to capture any regulatory requirements that might apply to it whenever they install it in the future.

Your thoughts?

David

>>> Ronan Kellaghan <ronan.kellaghan@paeholmes.com> 5/23/2011 11:05 am >>>  
 David,

Apologies for not getting back to you sooner on the proposed modified approval for Shoalhaven Starches. My main comment relates to Condition 3 of schedule 3. Condition 3B has been added which relates to the pelletising plant, however it is no longer the intension to install the pelletiser plant as part of the mandatory odour controls. It is my understanding that this condition is not required. The pelletising of DDG has been moved to the 'additional odour controls'.

All other conditions are consistent with my understanding of the proposed changes to the odour controls.

Regards

---

This email, and any attachments, is intended solely for the addressee. It is confidential, may contain personal information and may be subject to legal professional privilege. Unauthorised use is strictly prohibited and may be unlawful. If you have received this by mistake, confidentiality and any legal privilege are not waived or lost and we ask that you contact the author and delete and destroy this and any other copies. In relation to any legal use you may make of the contents of this communication, you must ensure that you comply with the Privacy Act and you should note that the contents may be subject to copyright and therefore may not be reproduced, communicated or adapted without the express consent of the owner of the copyright. No member of PAEHolmes accepts any liability or responsibility for or in connection with any data corruption, interruption, delay, computer virus, or access or amendment to the contents of or attachment to this email.

---

---

**From:** David Mooney [David.Mooney@planning.nsw.gov.au]  
**Sent:** Thursday, 5 May 2011 4:45 PM  
**To:** Ronan Kellaghan  
**Subject:** Shoalhaven Starches Expansion Project, Modification proposal

Hello Ronan,

Thank you for your time on the telephone this afternoon.

I've attached to this email a draft approval for the proposed modification to omit the DDG pelleting plant. Could you review the conditions and comment if necessary?

Please feel welcome to telephone or email if you have any questions.

Regards,

**David Mooney**  
Planning Officer, Mining and Industry Projects  
Department of Planning and Infrastructure  
p. 02 9228 2040

-----  
-----  
This message is intended for the addressee named and may contain confidential/privileged information. If you are not the intended recipient, please delete it and notify the sender.  
Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department.  
You should scan any attached files for viruses.  
-----  
-----

-----  
-----  
This message is intended for the addressee named and may contain confidential/privileged information. If you are not the intended recipient, please delete it and notify the sender.  
Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department.  
You should scan any attached files for viruses.  
-----  
-----



**City Administrative Centre**

Bridge Road, Nowra NSW Australia 2541

Phone: (02) 4429 3111 • Fax: (02) 4422 1816 • DX 5323 Nowra

**Address all correspondence to**

The General Manager, PO Box 42, Nowra NSW Australia 2541

COUNCIL REFERENCE:

3A07/1008-04 (D10/77679)

CONTACT PERSON:

John Britton

YOUR REF:

13 April 2010

Department of Planning - Major Project Assessments  
GPO Box 39  
SYDNEY NSW 2001



Attention: Ms Anne-Maree Carruthers

Dear Ms Carruthers

**Shoalhaven Starches, Bomaderry  
Modification Application (MP 06\_0228 MOD 1)**

Department of Planning  
Received  
19 APR 2010  
Scanning Room

I refer to your letter dated 18 March 2010 seeking preliminary comments concerning the proposed modification to the approved requirements for works associated with the Dried Distillers Grain Pettetisation (DDGS) Plant. The documents have been reviewed and Councils preliminary comments are as follows:

**Odour**

As you will be aware, Council is not the regulatory authority for the site and operations. The premises are currently licensed by DECCW who is the ARA responsible for investigating environmental pollution incidents and compliance with operating conditions.

The main issue remains the production of offensive odour as a bi-product of production. In 2006 DECCW successfully prosecuted the company for an odour incident which breached the licence. Subsequently, an audit of processes occurred which led to a number of changes to modify the adverse impact.

The mitigation measures proposed appear satisfactory to address the odour from the amended proposal. It is recommended that these mitigation measures form conditions of consent as listed below to ensure they are implemented and to demonstrate the proposed biofilter system will remove all odours produced from the DDG product storage shed as suggested. This should be provided prior to issue of the approval.

The following Conditions Relating to Approved Work and Site Management are recommended to be imposed on any subsequent approval by the Department;

### **Odour Control**

1. The biofilter system design and operation shall be reviewed to demonstrate that it can adequately remove the odours associated with the DDG product storage shed.
2. The DDG product storage shed shall be fully enclosed and an air extraction system installed that directs the air to the biofilter system. The biofilter system shall be designed and maintained so that it removes odours from the DDG product storage shed.

### **Air Conditioning / Cooling Tower Condition**

1. The air handling system and cooling tower shall be designed, installed and maintained in accordance with the requirement of the Public Health Act 1991 (Part 4 Microbial Control) and Regulations. Further, the air handling system cooling tower shall be designed, installed in accordance with Australian Standard AS3666.1:1995 Air handling and water systems in building - microbial control and shall be maintained in accordance with Australian Standard AS3666.2:1995 Air handling and water systems in building - microbial control - operation and maintenance.
2. It is legally incumbent on the occupier of the premises to notify the Local Authority (Council) of any changes necessary to update the Register of Premises with Regulated Air Handling Systems installed on them.
3. All waste water from the cooling tower/humidifier/evaporative cooler/warm water system shall be discharged to sewer under a Trade Waste Agreement with Shoalhaven Water.

If you need further information about this matter, please contact John Britton, Development & Environmental Services Group on (02) 4429 3432. Please quote Council's reference 3A07/1008-04.

Yours faithfully



**Tim Fletcher**  
**Director Development & Environmental Services**