



30 September 2011

Determination of Modifications to the Mandatory Odour Controls for the Shoalhaven Starches Expansion Project, Shoalhaven LGA

Background

Shoalhaven Starches operates a wheat and grain processing factory on the outskirts on Nowra in the Shoalhaven Local Government Area. The operation has had a long history of odour problems. In 2009 the then Minister for Planning approved an expansion project to allow for an increase in ethanol production, from 126 to 300 mega litres a year. The increase in production is contingent on a number of mandatory odour controls being implemented, including: "*Pelletise DDG [Dried Distillers Grain] product and fit heavy curtains to openings in the DDG product storage shed and load out tent*".

Modification Application

The Proponent is now seeking to remove the requirements to pelletise DDG and fit curtains from the list of mandatory odour controls and replace them with a number of alternative odour controls including:

- Installing Moduflex Bellow Feeders and dust extractors on the DDG load chute;
- Extending and enclosing the load-out shed with motorised doors;
- Ducting the Palmer Cooler discharge stack and DDG Recovery plant emissions to the boilers for odour destruction; and
- Ducting air from the DDG-Evaporator to the bio-filter.

Delegation to the Commission

As the Proponent has declared reportable political donations, the Director-General of the Department of Planning and Infrastructure (the Department) referred the application to the Planning Assessment Commission for determination under the Ministerial delegation of 28 May 2011.

Mr John Court constituted the Commission for the project.

Director-General's Assessment Report

The Director-General's Environmental Assessment Report considered the following key issues:

- Odour;
- Air Quality;
- Noise;
- Soil and Water;
- Visual;
- Biodiversity and Heritage;
- Hazards.

The report concluded that the alternate controls proposed would be as effective as the mandatory controls they are seeking to replace. The report indicates that the Department is satisfied that the proposed modification is acceptable and should be approved subject to some minor changes to the existing conditions of approval.

Meeting with the Department of Planning and Infrastructure

On 9 September 2011 the Commission met with Department representatives, Ms Felicity Greenway and Mr David Mooney, for a briefing on the modification. The Department briefly

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described the progress of the odour control upgrades required to be implemented on site. The Commission and the Department then discussed the results of the 2010 independent odour audit and the capacity of the boilers and biofilter to collect and control odours from the additional sources proposed.

Commission's Comments

The Commission subsequently sought clarification from the Department on aspects of the proposed modification to odour control in relationship to the performance of the biofilter and boilers:

- Through the Odour Management Plan, the modified conditions will require biannual testing of the biofilter odour-control efficiency. This will adequately monitor the ongoing capability of the biofilter to receive the additional flows from odorous sources resulting from the modification.
- The significant additional flow of odorous air to the boilers, as required by the modification, could have diminished the effectiveness of capture from other odorous sources also directed to the boilers for control. Also, there is the issue of the practical viability of directing contaminated air flows through the boilers on a long-term basis. The Commission sought additional information through the Department on these aspects of the modification. It is now satisfied, based on the information provided, that there will be no significant impact on the control of other odorous sources and that there are measures in place to monitor the practical viability of the boilers as a means of odour control.
- Monitoring of complaints will be a useful tool for assessing odour performance, in conjunction with testing and reporting of odour sources and regular inspection to ensure equipment is operated and maintained in a proper and efficient manner.

Determination

The Commission is satisfied with the Department's assessment and recommendation to approve the modification. Consequently the Commission approves the application subject to the recommended conditions.



Mr John Court
Member
Planning Assessment Commission