



DOC16/631401-02  
MP06\_0228 MOD 12

Mr Chris Ritchie  
Director - Industry Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms Deana Burn

Dear Ms Burn

**RE: Modification 12 - MP06\_0228 - Shoalhaven Starches Ethanol Expansion Project - Beverage Grade Ethanol Production**

I refer to your letter of 13 December 2016 advising that the Department of Planning and Environment (DPE) has received a modification application from Shoalhaven Starches Pty Ltd to Major Project Approval 06\_0228 (Ethanol Expansion Project Approval), and inviting the Environment Protection Authority (EPA) to provide comments as it regulates the premises via an Environment Protection Licence (No. 883).

The EPA understands that the current modification application (MOD 12), involves changes to productions processes, including construction of plant and equipment to increase the volume of beverage grade ethanol produced at the Shoalhaven Starches premises. The EPA further understands that the proposed production changes will not result in any increase beyond the current approved 300 megalitre yearly ethanol (fuel & beverage grade) production limit.

The EPA has reviewed the Environmental Assessment prepared for the proposed modification by Cowman Stoddard Pty Ltd and dated November 2016, including a number of the specialist reports. The EPA notes the air quality impact assessment for MOD 12 predicts that the proposed increase in beverage grade ethanol production will only result in a very small increase in the overall odorous air emissions from Shoalhaven Starches premises. However, this determination is based upon the assumptions used and outcomes predicted by the air quality impact assessment prepared for MOD 11 (DDG dryer changes).

As you are aware, the EPA in its correspondence dated 16 February 2017 raised a number of concerns with the air quality impact assessment prepared for MOD 11. This includes the potential that air quality impacts for MOD 11 may have been under predicted and that the necessary comparative analysis between MOD 11 and the 2009 approved 'base case' in terms of odour performance has not been undertaken.

Given the current identified uncertainties with the air quality impact assessment for MOD 11, the EPA is not able to meaningfully interpret the results of the air quality impact assessment for MOD 12. In

particular, the EPA is not able to assess the overall cumulative odour impacts arising from both MOD 11 and MOD 12 in order to ensure that both proposals accord with the approved 2009 'base case' in terms of odour performance.

The EPA trusts that these comments are of assistance and should you wish to discuss this matter further, please contact Stefan Press on Ph: 6229 7002.

Yours sincerely



**JULIAN THOMPSON**  
**Unit Head - South East Region**  
**Environment Protection Authority**

21 February 2017