

Table 1. Shoalhaven Starches Independent Compliance Audit, GHD, April 2017 - Findings to be Addressed in MOD 13

Manildra Drawing No.	Asset Description	GHD Audit Asset Ref. No.	GHD Audit Finding	Shoalhaven Starches Comments / Reason for different location / design	Changes to Approved Production Capacity	Additional Impacts
MN6376-002	Temporary structures (shipping containers & de-mountables) in Factory area	US_12, US_13, US_14, US_15, US_16, US_17,	Unapproved development , non-exempt development.	Temporary maintenance and project support facilities.	NIL	NIL
MN6376-003	Fermenter Tank 15	A6_01B	Fermenter Tank 15 was constructed 23m to the southeast of the approved location.	Concept design lodged in the Environmental Assessment (EA). Further detailed design revealed the most cost effective option was to run the existing gantry connection in a straight line from Fermenter 14 to Fermenter 15.	NIL	NIL
	Fermenter Gantry	M2_04B	Footprint for Gantry not consistent with Approval 06_0228 MOD 2, however spatially compliant with Building Certificate BC12/1052. Constructed approx. 4m to the west of the approved location.	Concept design lodged in the EA. Further detailed design required the Gantry to be re-located due to existing pipework being located where the gantry supports were required.	NIL	NIL
	Fermenter Bund Wall	M2_09B	Bund was not specified by Approval DA 06_0228_MOD 2 however Section 7.5.2.3 of the Environmental Assessment (EA) 2008 specified that any new storage plant and equipment associated with the proposed ethanol upgrade project will be banded in accordance with relevant Australian Standards. The footprint for the Fermenter concrete bund was spatially compliant with Building Certificate BC12/1052.	Concept design lodged in the EA. The bund wall design was overlooked in the initial EA drawings.	NIL	NIL
	Temporary structures (de-mountable) in Factory area	US_77	Unapproved development , non-exempt development	Required facilities for rail personnel.	NIL	NIL
MN6376-004	Flour Mill	A7_03B	The footprint for the Flour Mill was not consistent with DA 07_0021 however it was spatially compliant with Construction Certificate CC01-138. Footprint extended by 80m2 towards the south.	Concept design lodged in the EA. Further detailed design revealed additional footprint required to accommodate flour tempering bins which was overlooked in the initial EA drawings.	NIL	NIL
MN6376-005	Product Dryer No.6	A6_19B	The footprint for Product Dryer 6 was not consistent with Approval DA 06_0228 however it was spatially compliant with construction certificates CC10273 and CC11220.	Concept design lodged in the EA. Further detailed design resulted in a different footprint required to accommodate the detailed design of the plant.	NIL	NIL
MN6376-006	Starch Dryer No.5 Building	M7_01	The layout within the footprint differs significantly from the layout proposed in the Environmental Assessment lodged on 12 November 2015.	Concept design lodged in the EA. The location of the starch dryer building shown within the approved EA footprint was indicative only. Further detailed design resulted in the building being located closer to the gantry to reduce the length of pipe work and associated support structures.	NIL	NIL
	Starch Dryer No.5 - Switch Room	M7_28		Concept design lodged in the EA. Further detailed design resulted in the location of the switch room being constructed on the ground floor of the starch dryer building as the most cost effective location.	NIL	NIL
	Starch Dryer No.5 - Gantry	M7_02, M7_03		Concept design lodged in the EA. Further detailed design resulted in the gantry being located closer to the starch dryer building to reduce the length of pipe work and associated support structure.	NIL	NIL
	Starch Dryer No.5 - Product Transfer line	M7_22, M7_23		The approved location of the product transfer line is shown for future connection to the approved but yet to be constructed Packing Plant on the Northern side of Bolong Rd. The product transfer line has been connected to the Interim Packing Plant until the proposed Packing Plant (MOD 9) is constructed.	NIL	NIL
	Starch Dryer No.5 - Tanks	M7_04, M7_05, M7_11, M7_12, M7_13, M7_14, M7_15, M7_16, M7_17, M7_24, M7_25, M7_26, M7_29, M7_30, M7_31, M7_32, M7_33		Concept design lodged in the EA; the location of the tanks within the overall starch dryer plant footprint were indicative only. Further detailed design resulted in the location of the tanks being constructed together within a bund adjacent to the starch dryer building and closer to starch plant as the most cost effective location.	NIL	NIL
	Starch Dryer No.5 -storage areas	M7_07, M7_08, M7_09, M7_10, M7_18, M7_19, M7_20, M7_21, M7_27		Concept design lodged in the EA shows miscellaneous storage areas located within the approved footprint which have not been constructed.	NIL	NIL
MN6376-007	Biofilter's	A6_29B, A6_29C	A6_29A represents the approved location for the bio-scrubber however the bio scrubber was not constructed. Two bio filters were constructed however no location was specified in the Approval for the bio filters.	Further investigations revealed a Biofilter would be more suitable than a Bio-scrubber. The Biofilter location was chosen to allow for additional Biofilters to be built next to each other.	NIL	NIL
MN6376-008	Weigh bridge	D223_01B	The location of weigh bridge was not spatially compliant with Approval DA 223-07-2002. Constructed 85m to the southwest of the approved location.	Further detailed traffic safety reviews revealed as-constructed location minimises risk to personnel and provides improved internal site traffic flows.	NIL	NIL
	Woodchip Shelter	US_03	Unapproved development , non-exempt development.	Following EPA approval to use wood waste, a shelter was constructed to keep woodchip dry.	NIL	NIL
MN6376-009	Storage Shed (at Environmental Farm)	US_05	The structure complies with SEPP (Exempt and Complying Developments) 2008 Clause 2.31 as exempt and complying development on agricultural land under Subdivision 16 Farm Buildings. The structure does not comply with Clause 2.32(c) as the building is not 10m from other lot boundaries. It is approximately 7m from the nearest lot boundary.	The distance of the shed from the nearest lot boundaries was overlooked during construction as Manildra owns the adjacent lots which form part of the Environmental Farm operations and approved irrigation area. The shed is used for storage of Farm equipment.	NIL	NIL
	Temporary structures (shipping containers) at the environmental farm	US_28, US_84	Temporary structure - One structure per lot on the rural land. 2 shipping containers identified on Lot 2/DP854765	The number of containers on each lot was overlooked as Manildra owns the adjacent lots which form part of the Environmental Farm operations and approved irrigation area. The containers are used for storage of Farm & fire fighting equipment.	NIL	NIL
	Temporary structures (shipping containers) at the environmental farm	US_79, US_80, US_81, US_82, US_83	Temporary structure - One structure per lot on the rural land. 5 shipping containers identified on Lot 2/DP842231	The number of containers on each lot was overlooked as Manildra owns the adjacent lots which form part of the Environmental Farm operations and approved irrigation area. The containers are used for storage of waste water treatment plant equipment.	NIL	NIL
	Tyres Stockpile at Environmental Farm	US_07	More than 5 tonnes of waste tyres or 500 waste tyres, site at any time, is a scheduled activity. The following resource recovery exemption also applies: "Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014 - The recovered tyres exemption 2014"	Shoalhaven Starches use tyres to hold down silage covers used for cattle feed on the Environmental Farm. Shoalhaven Starches believe the use of tyres is consistent with the NSW EPA 'The Recovered Tyres Exemption 2014, hence the number of tyres stored as a scheduled activity is not applicable. It is anticipated there is approximately 5000 tyres currently in use. The quantity of tyre's stockpiled will vary depending on silage production.	NIL	NIL