



DOC18/198798
MP 06_0228 MOD 15

Ms Deana Burn
Planner - Industry Assessment
Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Burn

Modification to the Shoalhaven Starches Facility, 160 Bolong Road, Bomaderry (MP 06_0228 MOD 15)

Thank you very much for your letter of 4 April 2018 regarding Shoalhaven Starches Pty Ltd request to modify approved components of the ethanol expansion project at the Shoalhaven Starches factory.

The EPA understands that this modification proposes to construct a carbon dioxide (CO₂) plant at the former Dairy Farmers complex. This CO₂ plant is proposed to capture waste gas from the fermenter tanks and treat the gas to a food grade standard. The capture and treatment of the CO₂ will reduce Shoalhaven Starches greenhouse gas emissions by up to 100 tonnes per day.

The EPA has reviewed the EA, including the following reports:

- Annexure 4 - "Environment Noise Impact Assessment Shoalhaven Starches & Supagas – Proposed CO₂ Plant Modification to MP 06_0228" dated 16 January 2018 and prepared by Harwood Acoustics; and
- Annexure 5 - "Air Quality Assessment" dated 12 December 2017 and prepared by GHD

To assist DPE in its assessment of MOD 15, the EPA provides the following comments.

Operational Noise

The information contained in the noise impact assessment report predicts that the operational noise (post construction) from the proposed CO₂ plant will not result in cumulative noise levels from the Shoalhaven Starches premises that exceed the current noise limits contained in Environment Protection Licence No. 883 (the "**Licence**"). It is noted that the predicted noise levels indicated in Table 4 of the noise impact assessment report are on the basis of the proposed CO₂ plant and equipment having sound power levels as shown in Table 3 of the noise impact assessment report.

As such, the EPA will not need to amend the noise limits in the licence but it is recommended that any approval of the proposal contain appropriate conditions which requires:

- The proposed CO₂ plant and equipment comply with the sound power levels in Table 3 of the noise impact assessment report and;
- a noise validation be undertaken within the first 12 months of operation of the CO₂ plant to confirm that noise emissions comply with the predictions in the noise impact assessment and if not, all reasonable and feasible noise mitigation measures are implemented to achieve compliance.

Construction Noise

The information contained in the noise impact assessment report predicts construction noise, including impact piling activities will comply with the noise management levels (as per Table 6 of the noise impact assessment report) at each nominated receiver location. It is understood that these noise management levels have been derived using the quantitative method detailed in the *Interim Construction Noise Guideline*.

The EPA does however note that impact piling activities are predicted to be at the noise management goal for nominated receiver location 1 and approaching the noise management goals at the other nominated receiver locations. It is noted that noise from the other remaining construction activities are below the noise management levels specified in Table 6 of the noise impact assessment report. It is also noted that the noise impact assessment does not specify construction hours for the proposal.

To provide that any construction noise impacts from the proposal are able to be appropriately managed and provide minimal impact upon the community, it is recommended that any approval of the proposal contains conditions that restrict:

- all impact piling activities to between 9:00am and 5:00pm Monday to Friday, and;
- all other construction activities to standard construction hours (7:00am to 6:00pm Monday to Friday, 8:00am to 1:00pm Saturday and no work Sundays or public holidays).

Air Quality

The EPA notes the information contained in the air quality impact assessment report shows “the proposal is primarily enclosed with only minor emissions to air” and that “air quality impacts (odour and other pollutants) are not anticipated and there is no expected increase to the cumulative levels in the local area.” The EPA also understands that the proposal will capture CO₂ gas that is currently discharged to atmosphere and so will result in a decrease of overall air emissions from the Shoalhaven Starches premises.

As such, the EPA is satisfied that the proposal will not likely have any impacts on air quality.

Other Comments

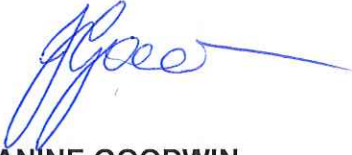
The EPA understands that the proposed CO₂ plant may be the subject of a separate environment protection licence given the potential for it to be operated by a separate party (Supagas). Should a separate licence be required, an application will need to be lodged with the EPA (subject to the MOD 15 being approved).

Any such new licence will include noise limits consistent with the Shoalhaven Starches Environment Protection Licence and will likely include an effluent discharge point and associated effluent quality and volume monitoring requirements for waste water generated by the cold water scrubber of the proposed CO₂ plant.

The EPA understands from discussions with Shoalhaven Starches that waste water from the proposed cold water scrubber will be conveyed to Shoalhaven Starches waste water treatment plant for disposal. This approach is consistent with Environment Protection Licence 11164 which has been issued for the existing CO₂ plant that is operated by BOC Limited and which takes CO₂ gas from Shoalhaven Starches premises.

I trust that these comments are of assistance. Should you have any further queries regarding any of the above please contact Stefan Press in our office on phone 02 6229 7002.

Yours sincerely



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SOUTH EAST REGION

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17 April 2018