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29 May, 2018

Our ref: 17/49

Your ref: MP 06\_0228 Mod 15

Deana Burn  
Industry Assessments  
NSW Department of Planning & Environment  
Deana.Burn@planning.nsw.gov.au

Dear Deana

**RE: SHOALHAVEN STARCHES EXPANSION PROJECT (MP06\_0228 MOD 15)  
MODIFICATION APPLICATION 15 – PROPOSED CO2 PLANT  
RESPONSE TO SUBMISSIONS**

I refer to your email dated 1<sup>st</sup> May 2018 in which you seek responses to submissions made by government agencies and the public in relation to the above Modification Application (Mod 15). Our firm has been engaged by Shoalhaven Starches and Supagas to prepare this submission in response to issues raised by the government agency and public submissions made in relation to the above Modification Application.

## **1.0 Government Agency Submissions**

### **1.1 Environment Protection Authority (EPA)**

The EPA in a submission dated 17<sup>th</sup> April 2018 provides comments in relation to the proposal to assist the Department in its assessment of this Modification Application.

The EPA submission does not raise any objections to the Modification Proposal although recommends the following conditions to address issues pertaining to noise should the Department determine approval of MOD 15:

#### *Operational Noise*

- *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 assessment and if not, all reasonable and feasible noise mitigation measures are implemented to achieve compliance.*

### *Construction Noise*

- *All impact piling activities to be between 9.00 am and 5.00 pm Monday to Friday; and*
- *All other construction activities to standard construction hours (7.00 am to 6.00 pm Monday to Friday, 8.00 am to 1.00pm Saturday and no work on Sundays or public holidays).*

### Response

The EPA's recommendations are consistent with the terms, findings and conclusions of the "*Environmental Noise Impact Assessment*" prepared by Harwood Acoustics and which supports the Environmental Assessment (EA) prepared in support of this Modification Application. No objections are raised to the comments or recommendations of the EPA in this instance.

### **1.2 Roads & Maritime Services (RMS)**

The RMS submission dated 13<sup>th</sup> April 2018 identifies that Bolong Road is a regional classified road managed by Shoalhaven City Council.

In 2015, RMS advise that they reviewed their level of involvement with respect to classified regional roads and determined it more appropriate for councils to consider if proposed access arrangements are acceptable from a network perspective.

Given the above, RMS entrusts Shoalhaven City Council to assess the traffic implications of this application.

### Response

The RMS submission does not raise any substantive issues in relation to the Modification Application that requires a response. Traffic issues raised by Shoalhaven City Council are addressed in Section 1.4 of this submission.

### **1.3 Department of Industry**

The submission from the Department of Industry dated 20<sup>th</sup> April 2018 advises that matters of regulatory interest to the Department of Industry – Lands & Water and Department of Primary Industries have been adequately addressed in the EA and no objections are raised to the proposal. This submission includes the following recommendation:

- *Works within waterfront land should be undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Land (2012).*

### Response

The Department of Industry submission does not raise any substantive issues in relation to the Modification Application that requires a response.

It should be noted that all works associated with this proposal are situated more than 40 metres from the riverbank of the Shoalhaven River. Under these circumstances no works associated with this proposal are to occur on 'waterfront land' for the purposes of the



Water Management Act. The *Guidelines for Controlled Activities on Waterfront Land (2012)* are therefore not relevant to this proposal.

#### **1.4 Shoalhaven City Council ("Council")**

Council's submission indicates that it raises no objection in principle to the Modification Application subject to the following matters being considered by the Department.

##### *Development Engineering Comments / Requirements*

- 1. The Traffic Impact Assessment and plans indicate and show that B-Double trucks are going to access the site through the building. The submitted turning path plan shows the B-double truck also hitting the building between the roller door access points. Refer to the images below, which also show that the southern side of the building is for exit only.*
- 2. Clarification is required as to whether the development needs the B-Double trucks to enter the building other than for manoeuvring reasons.*
- 3. During Council's inspection of the site numerous semi-trailer tanker trucks were parked at the rear southern side where the B-Doubles are proposed to access the site. The submitted turning path plan also shows these tankers. The proposed location for parking of these tankers needs to be confirmed.*
- 4. The existing approved tear drop access/exit point onto Bolong Road is not a mountable island so access around the building from Bolong Road to the western side could be a difficult manoeuvre to achieve, as shown in the image above.*

##### Responses

- Attached to this submission is a revised truck turning swept path for a B-Double truck prepared by Allen Price & Scarrats demonstrating the swept path is able to be accommodated through the building without hitting the wall between the roller shutters.
- As detailed in Section 2.2.3 of the Traffic Impact Assessment prepared by ARC Consulting and which forms Annexure 7 to the EA in support of this Modification Application truck movements to and from the site will be generally consistent with the same truck access paths as that currently generated by the existing Meat Plant vehicles. There is no other reason for the trucks to enter the building as shown other than for manoeuvring purposes.
- The parking of semi-trailers tanker trucks to the rear of the site can be undertaken without interfering with the swept paths included in the application. In this regard this truck parking area can be relocated slightly to the north, with appropriate line marking, to enable the swept path shown to be undertaken without conflicting with this truck parking.
- The proposal does not rely upon access around to the west of the building from Bolong Road, as vehicles will enter the building and then pass through the building to the rear of the site as heavy vehicle movements already do for the site. As truck movements are able to utilise the access through the building there is no need for a heavy vehicle to manoeuvre around the western side of the building.

*Environmental Health Officer (EHO) Comments/Requirements:*

- *No waste water report was provided, only a statement from the site manager stating that the existing system will handle an increase in volume. It is recommended that more information be provided to support this claim.*

*Response*

Attached to this submission is a further letter prepared by Shoalhaven Starches which confirms that there is sufficient capacity within the existing waste water treatment system as follows:

*The average flow of wastewater to Shoalhaven Starches WWTP over the previous 12 months is 8.4 million litres (ML) per day, the design capacity is 10 ML per day, which provides for spare capacity of 1.6 ML per day.*

*The predicted wastewater flow (at 100 tonnes per day CO<sub>2</sub>) for the proposed SupaGas CO2 Plant is 4,320 litres per day (a 0.05% increase), and contains very low organic levels, which can easily be accommodated in the WWTP systems spare capacity.*

The following conditions of consent are recommended by Council's EHO:

*a. Air Cooling Tower*

*The proposed cooling tower needs to be registered and maintained in accordance with the Public Health Act 2010. In this regard notification of installation of a cooling tower must be made within one(1) month of installation.*

*b. Acid Sulphate Soils*

*An Acid Sulphate Soil Management plan be prepared for the project prior to the issue of the Construction Certificate. The plan must be prepared in accordance with the relevant sections of the 1998 ASS Manual prepared by ASSMAC.*

*c. Contamination*

*A remediation action plan must be provided for works along the western section of the pipeline in the vicinity of the former farmhouse.*

*Responses*

- No objections are raised with the requirement to register cooling towers under the Public Health Act 2010.
- No objections are raised with the requirement for the preparation of an Acid Sulphate Soil Management Plan as this is consistent with the recommendations of the Preliminary ASS Assessment carried out by Coffey's and which forms Annexure 8 to the EA.
- The Phase 1 Contamination Assessment carried out by Coffey's recommended that with respect to the western section of the pipeline (AE4):

*AEC 4 was assessed to have a high potential for contamination as bonded asbestos containing material has been previously identified in this area.*



*The site history information indicated this area formerly had a farmhouse dwelling and associated structures. Bonded asbestos containing material was identified in soils within this area. If excavation is proposed in this area then appropriate management will be required to protect the health of workers and nearby users along with appropriate waste management. This work would need to be carried out in compliance with relevant standards*

*Sampling of site soils could be carried out pre-development to assess the actual conditions of the site, otherwise the development could be managed through adopting a robust construction environmental management plan and unexpected finds protocol (UFP) to mitigate risks to construction workers and the nearby environment. The UFP would assist to provide direction that if during the excavation work, material is encountered which appears to be potentially contaminated or suspicious, excavation works should cease until observation is carried out by a competent environmental consultant. In the context of the above, potentially contaminated or suspicious material would include stained or odorous soil, fibrous material, asbestos sheeting, drums, metal or plastic chemical containers or brightly coloured material, septic pits etc.*

*Should soils require offsite disposal or re-use, then they should be appropriately classified or assessed against relevant resource recovery exemptions and/or the NSW EPA 2014 Waste Classification Guidelines, whichever is more appropriate.*

The above recommendation has been included in the Statement of Commitments included in Section 9.4 of the EA.

The Coffey recommendation does not specify the need for a remediation plan as recommended by Council. If the Department are of a mind to impose further requirements in this regard consideration should be given to the specific recommendations of the Coffey report as opposed to Council's recommended condition.

#### *Flooding Comments/Requirements:*

- The proposal is located within a high hazard floodway and high hazard flood storage area. A detailed flood compliance assessment is required on how the development will achieve all relevant objectives, performance criteria and/or acceptable solutions of Shoalhaven Development Control Plan 2014, as prescribed in sections 5.1 and 5.2 of Chapter G9, taking the flood affectation of individual lots into account.*

#### Response

Annexure 6 to the EA that supports this Modification Application includes a detailed Flood Compliance Report prepared by WMA Water which details how the development will achieve all relevant objectives, performance criteria and/or acceptable solutions of Chapter G9 of the Shoalhaven Development Control Plan 2014.

#### *Shoalhaven Water Comments*

Councils submission also includes Shoalhaven Water requirements for this Modification Application which includes the following comments:

- *Any works associated with access to the development which impacts upon Shoalhaven Water's assets (e.g. unsatisfactory cover requirements) within Bolong Road, shall be at the developer's expense. All plans and specification of proposed works shall be submitted to Shoalhaven Water for determination.*
- *All non-domestic waste (i.e. trade waste) is to be directed to Manildra Wastewater treatment plant. No trade waste is to be discharged to Council sewer (via private sewer pump station) unless Liquid Trade Waste Approval has been granted by Shoalhaven Water*

#### Response

Shoalhaven Starches and Supagas raise no objections to these requirements.

## **2.0 Public Submission**

One (1) submission has been made by the public in relation to this Modification Application. As the address of the person making this submission has not been supplied it is difficult to frame a response that might be specific to the issues raised. However, following a review of the issues raised in this submission it is evident that the submission appears to raise issues in relation to the overall Shoalhaven Starches operations and not specifically in relation to this Modification Application. The following is a summary of the specific issues raised by this submission and including our responses.

1. *Noise Pollution: The amount of large trucks using Camberwarra and Meroo road in Bomaderry has increased significantly over the period of expansions to the Manildra plant. This has a huge impact on the residential areas of Bomaderry. To our knowledge there has never been any work carried out by the EPA to determine the noise levels from the trucks using these roads. There should be a curfew on trucks using these roads to coincide with the current regulations for construction.*

*The trucks should not be able to use this road between the hours of 8pm and 7am. There is an alternative route, via the Princes Highway onto Bolong road at the traffic lights, which can be used at night. This needs to be investigated and there needs to be consultation with the residents in the area to determine the impact. There is noise impact from the plant it's self the noise is reaching excessive levels at night again impacting residence to the point we cannot have windows open at night due to the constant noise coming from the plant. There also needs to be curfew hours at night so this does not impact on the residents*

#### Response

As detailed in Section 2.3.1 of the Traffic Impact Assessment (TIA) prepared by Anton Reisch Consulting (ARC) (Annexure 7 to the EA) at full operation it is anticipated the proposal would generate 2 B-doubles and 2 articulated trucks each day, with a peak daily truck generation of 8 truck trips per day. According to ARC (Section 2.4 of the TIA) the proposal will have little if any impact on the local road network simply as a factor of the very minimal trip generation. SIDRA modelling supporting the TIA indicates the additional traffic generated by the development would have no impact on levels of services, and would have no impact on existing on-site operations.

In terms of noise impact the EA is supported by a Noise Impact Assessment prepared by Harwood Acoustics (Annexure 4). This noise assessment confirms that noise emissions from the proposal will be within the noise design goals derived from limits set by the Environment Protection Licence (No. 883) limits.



I note that EPA in their submission in response to this proposal does not raise any objections to the proposal and particularly in terms of noise impacts. The EPA submission does make recommendations for appropriate conditions to be imposed on any approval in terms of operation and construction noise limits. As detailed above the Applicant agrees to these conditions.

2. *Environmental impact on the residential area - We already have residue floating in the air if they are going to be using coal this needs to have an environmental study completed to determine this will be safe for the residence. They stopped using this coal because it was dirty so why is it that the government feels it's okay for Bomaderry residents to be impacted by the use. Again, there have been no studies completed by the EPA, which we are aware of in consultation with the residents to determine the impact this will have on our lives.*

Response

This proposal does not involve the use coal on the site as implied by the objector's submission.

This proposal seeks to process CO2 that is already produced at the Shoalhaven Starches factory site into food grade CO2. In terms of air quality impacts the proposal will have a beneficial impact of reducing CO2 emissions that would have otherwise been vented to the atmosphere by up to 100 tonnes per day when fully operations. This will have positive impacts in terms of greenhouse gas emissions from the overall Shoalhaven Starches operations.

The proposal is supported by an Air Quality Impact Assessment prepared by GHD (Annexure 5). This assessment identifies that "*air quality impacts (odours and other pollutants) are not anticipated and there is no expected increase to the cumulative levels in the local area.*"

It is also noted that the EPA's submission dated 17<sup>th</sup> April 2017 states that the EPA is satisfied that the proposal will not likely have any impacts on air quality.

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I trust that the above responses are of assistance in the Department's consideration of this Modification Application. If you require any further clarification in connection with this submission, please do not hesitate to contact me.

Yours faithfully



Stephen Richardson  
COWMAN STODDART PTY LTD



LOT242  
DP1130535

BOLONG ROAD

BOLONG ROAD

MEAT PROCESSING PLANT

PROPOSED LOCATION OF NEW WEIGHT BRIDGE

PROPOSED LOCATION OF 4 NEW CAR PARKING SPACES

PROPOSED LOCATION OF CO2 PLANT BUILDINGS & FACILITIES

B-DOUBLE (25.0m) - MANDATORY STOP

10.86

6.2

12.5

4.6

MAX 72° HORIZ

MAX 6° VERT

MAX 72° HORIZ

MAX 6° VERT

1.0

3.35

1.3

6.5

1.3

1.3

1.3

1.6

8.1

0.56

6.00 sec

B-DOUBLE (25.0m) - MANDATORY STOP

OVERALL LENGTH 25.000m

OVERALL WIDTH 2.500m

OVERALL BODY HEIGHT 4.300m

MIN BODY GROUND CLEARANCE 0.540m

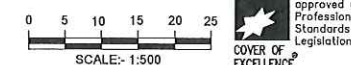
TRACK WIDTH 2.500m

LOCK TO LOCK TIME 6.00 sec

TURN TO TURN TURNING RADIUS

PROPOSED LOCATION OF  
CO2 PLANT BUILDINGS &  
FACILITIES

PROPOSED LOCATION OF-  
NEW WEIGHT BRIDGE



DRAWING STATUS		PRELIMINARY	
		NOT TO BE USED FOR CONSTRUCTION PURPOSES	
DRAWING NUMBER	SHEET	1	REVISION
N27328_001	OF	2	P4





## MANILDRA GROUP

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MANILDRA STARCHES PTY LTD - MANILDRA SUGARS - HONAN HOLDINGS PTY LTD -  
MANILDRA MILLING CORPORATION - U.S.A.

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23<sup>rd</sup> May 2018

Mr Stephen Richardson  
Cowman Stoddart Pty Ltd

Dear Stephen,

Further to our letter dated 31<sup>st</sup> January 2018 in relation to the capacity of Shoalhaven Starches Waste Water Treatment Plant (WWTP) to accommodate the waste water stream from the proposed SupaGas Carbon Dioxide (CO<sub>2</sub>) Plant we provide the following additional information.

The average flow of wastewater to Shoalhaven Starches WWTP over the previous 12 months is 8.4 million litres (ML) per day, the design capacity is 10 ML per day, which provides for spare capacity of 1.6 ML per day.

The predicted wastewater flow (at 100 tonnes per day CO<sub>2</sub>) for the proposed SupaGas CO<sub>2</sub> Plant is 4,320 litres per day (a 0.05% increase), and contains very low organic levels, which can be accommodated in the WWTP systems spare capacity.

Regards,

Ming Leung  
Site Manager  
Shoalhaven Starches Pty Ltd