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6 July, 2020

Shaun Williams
Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Shaun

**RE: MODIFICATION NO. 18 (MOD 18) – HAND SANITISER ALCOHOL PRODUCTION
SHOALHAVEN STARCHES EXPANSION PROJECT (MP_06-0228)**

I refer to the Department's email dated 1st June 2020 and to the submission from the EPA dated 15th June 2020 in relation to the above Modification Application. This submission has been prepared to respond to the matters raised in these two submissions.

The email from the Department requests the following further information:

1. *It is noted that SEE only briefly describes the hand sanitiser will be manufactured based on the ethanol produced on site and mixed with additive. However, the specific details are not provided. Please provide details of the following:*
 - a. *blending process, location and associated safeguards*
 - b. *types of additive and associated storage quantity, location and DG class.*
 - c. *location of decanting and associated safeguards of decanting process*
 - d. *total storage quantity for the hand sanitiser shed and any information in relation to bunding/ spill management for this shed and other safeguards relevant for this shed.*
2. *While the PHA has identified the key risk contributor and demonstrated the impacts through heat radiation contours for the new ethanol storage tank, the loading bay, distillery bund fire, please clarify and illustrate whether the worst case fire scenarios in the hand sanitiser could have an off-site effect, given the final product could still have a significant ethanol content.*

The submission from the EPA requests the following information:

The EPA requests that the proponent calculates the maximum volume of dangerous goods that will be stored in the new covered storage area. The EPA also recommends that, should Mod 18 be approved, DPIE consider the planning consent include condition(s) that stipulate the maximum storage and require a HAZOP/fire risk analysis that includes:

- *The impact of a fire (in the same way tank fires are considered in the preliminary hazard analysis);*
- *Control of ignition sources;*
- *Fire protection equipment; and*
- *Bunding and/or containment.*

Firstly the SEE that supported the original Modification Application did not originally describe the proposal involving the manufacture of hand sanitiser. As detailed in the SEE the Modification Proposal sought to increase the production of hand sanitiser grade alcohol – it did not involve the production of hand sanitiser. Section 3.1 of the SEE that supported the Modification Application described the processes involved in the production of the higher-grade ethanol.

Following further consideration however, Shoalhaven Starches now propose to re-purpose the defatting building located adjacent to the existing and proposed Ethanol Storage Tanks for the production of hand sanitiser. Shoalhaven Starches therefore propose to amend the current Mod 18 to include the on-site production of hand sanitiser product.

Shoalhaven Starches have however decided to no longer proceed with the storage cover shed which formed part of the original proposal. Shoalhaven Starches therefore propose to amend the current Mod 18 by deleting this shed from the proposal. The removal of this covered storage area therefore removes issues 1(d) and 2 from the Department's email as well as the matters raised by the EPA from requiring further consideration.

Attached to this submission is a revised drawing set providing for the repurposing of the defatting building for the production of hand sanitiser; and deleting reference to this shed structure.

Also attached to this submission is a revised Preliminary Hazard Analysis (PHA) prepared by Pinnacle Risk Management. Section 3.3 of the revised PHA includes discussion on the hand sanitiser production process, as requested by the matters raised by points 1 (a – c) of the Department's email.

We would therefore request that the Department take the above, the attached amended drawing set and revised PHA into its consideration of this Modification Application.

If you require any further information in relation to this matter please do not hesitate to contact me.

Yours faithfully



Stephen Richardson
COWMAN STODDART PTY LTD