



ENVIRONMENT PROTECTION AUTHORITY

Our reference: DOC12/2621  
Contact: Stefan Press, (02) 6229 7002

Mr Chris Ritchie  
Manager – Industry  
Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2011



21 February 2012

Dear Mr Ritchie

**RE: Modification of Shoalhaven Starches Ethanol Expansion Project (MP06\_0228) –  
Proposed Changes to Fermentation and Distillation Process**

I refer to your letter dated 18 January 2012, which seeks comments from the Environment Protection Authority (EPA) in relation to a proposed modification of Project Approval MP06\_0228 by Shoalhaven Starches Pty Ltd. The proposed changes are in relation to the fermentation and distillation processes associated with ethanol production activities at Shoalhaven Starches Pty Ltd's premises located at 160 Bolong Road, Bomaderry.

The EPA has reviewed the accompanying Environmental Assessment titled "Shoalhaven Starches – Proposed Operational and Process Improvements Relating to Project Approval MP06\_0228", prepared by Cowman Stoddart Pty Ltd and dated January 2012 ("the EA"). The EPA notes that the proposed changes includes amongst other things the addition of two new fermenters, the conversion from a continuous fermentation process to a batch fermentation process, the conversion of an existing fermenter to a surge or buffer tank (prior to the DDG dryers) and the installation of a new evaporator associated with other changes to the distillation process. Some of these process changes or additions appear to add to or change the air emissions from the fermentation process and may consequently add to odour emitted to the atmosphere.

An assessment of the potential impacts on air quality resulting from these changes/sources in accordance with the "Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales" (DEC 2005) ("the approved methods") has not been included in the EA. As a result, the EPA has not been able to fully assess the impact of this aspect of the proposed modification on air quality.

Accordingly, the EPA recommends that an air quality impact assessment in accordance with the EPA's Approved Methods be undertaken and submitted to the Department of Planning and Infrastructure to allow this issue to be properly considered prior to any determination of the

modification application being made. It is important to note that there may be other potential emission points to air other than those listed above and as such, the air quality impact assessment should identify and assess all potential air emission points associated with the modification proposal. Further, where it is identified that an odour treatment for an air emission point(s) is required, the air quality impact assessment should include full details of the odour treatment option and the expected odour treatment performance levels that will be achieved.

Should you wish to discuss this matter, please contact Stefan Press on 6229 7002.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Thompson', with a long horizontal stroke extending to the right.

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