

 Our reference:
 EF13/3577: DOC14/24915-1

 Contact:
 Stefan Press 02 6229 7002

Mr David Mooney Industry, Key Sites and Social Projects NSW Department of Planning & Infrastructure GPO Box 39 Sydney NSW 2000

Attention: Douglas Cunningham

11 March 2014

Dear Mr Mooney

## RE: Shoalhaven Starches Pty Ltd - Proposal for minor modification to the DDG Pelletising Plant – Section 75W EP&A Act - MP06\_0228 – Lot 62 DP 1078788, Bolong Rd, Bomaderry NSW.

I refer to your letter of 28 February 2014 seeking comment of the Environment Protection Authority (EPA) on the above proposed modification of the DDG Pelletising Plant at Shoalhaven Starches Pty Ltd. Thank you for the opportunity to review and provide input into this modification. As you are aware, Shoalhaven Starches Pty Ltd holds Environment Protection licence (No. 883) with the EPA in respect of the factory.

The EPA has reviewed the Environmental Assessment provided to support the proposed modification. The changes in location, size and height above ground level to the originally proposed development are consistent with the original environmental impacts identified in the Environmental Assessment for the development.

The DDG Pelletising Plant installation was originally a mandatory odour control to reduce fugitive odour and dust emissions associated with the handling and storage of granular DDG product. However, on 30 September 2011 the DDG pelletising process was listed under 'Other Odour Controls' under the condition that a range of alternative odour controls were implemented. The development of the DDG Pelletising Plant should help to reduce odours, waste and assist Shoalhaven Starches to progress towards a "closed loop" system of production with respect to odour emissions.

The EPA notes the Environmental Assessment states that the air emissions from the proposed DDG pelletising plant are to be conveyed to the existing biofilters for odour treatment. The EPA recommends that prior to any approval for this modification that Shoalhaven Starches demonstrates there is sufficient capacity in the biofilters to effectively treat the additional odorous air streams from the DDG pelletising plant, or whether additional odour treatment capacity will be required.

PO Box 622 Queanbeyan NSW 2620 Level 3/11 Farrer Place Queanbeyan NSW 2620 Tel: (02) 6229 7002 Fax: (02) 6229 7006 ABN 43 692 285 758 www.epa.nsw.gov.au I trust this information is of assistance. Should you have any queries or wish to discuss the EPA's response, please contact me or Stefan Press on Ph: 6229 7002.

Yours sincerely

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