



Our reference: DOC16/230478-01
Contact: Stefan Press, (02) 6229 7002

Mr Chris Ritchie
Director – Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

17 June 2016

Dear Mr Ritchie

**RE: Shoalhaven Starches Pty Ltd – Bolong Rd Bomaderry –
Ethanol Expansion - Packing Plant Modification - Project Approval 06_0228**

I refer to your letter of 10 May 2016 advising that the Department of Planning and Environment (DPE) has received a modification application from Shoalhaven Starches Pty Ltd to Major Project Approval 06_0228 (Ethanol Expansion Project Approval), and inviting the Environment Protection Authority (EPA) to provide a submission during the public exhibition period.

The EPA understands the current modification application involves changes to the previously approved packing plant configuration, siting and access arrangements, including the addition of a second railway spur line (the proposal). As you are aware, this packing plant was approved to be constructed on Shoalhaven Starches land located on the northern side of Bolong Road as part of the original Ethanol Expansion Project Approval.

The EPA via DPE's website has accessed and reviewed the Environmental Assessment prepared by Cowman Stoddard Pty Ltd and dated March 2016 for the proposal, including a number of the specialist reports. To assist DPE with its consideration of the proposal the EPA has provided comments in relation to potential noise, air quality and waste management issues in Attachment 1 to this letter.

I trust you find the EPA's comments helpful in the Department's assessment of the proposal. Should you wish to discuss this matter, please contact Stefan Press on Ph: (02) 6229 7002.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Thompson'.

JULIAN THOMPSON
Unit Head – South East Region
Environment Protection Authority

ATTACHMENT 1

The EPA has reviewed the Environmental Assessment prepared by Cowman Stoddard Pty Ltd and dated March 2016 (the EA) as well as the following specialist reports:

- “Environmental Noise Impact Assessment – Proposed Modification to packing Plant & Container Storage Area” prepared by Day Design Pty Ltd and dated 15 March 2016 (the noise impact assessment report); and
- “Air Quality Impact Assessment – Proposed Modifications to Approved Packing Plant” prepared by Stephenson Environmental Management Australian and dated 21 December 2015 (the air quality impact assessment report).

The EPA provides the following comments to assist DPE with its consideration and determination of the proposal.

Noise

The information contained in the noise impact assessment predicts that operational noise (post construction) from the proposal 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 (EPL). It is noted that this is on the basis of the noise mitigation measures contained in the original Shoalhaven Starches Ethanol Project Approval being implemented for the packing plant along with the proposed new noise mitigation measures contained in the current noise impact assessment report. This includes requirements to construct the packing plant building out of specified sound insulating materials and that rail movement/activities including container loading/unloading will not be undertaken during the night time period (10pm – 7am).

The noise impact assessment report does however detail that it is not known what if any significant producing mechanical plant and equipment may be externally located as part of the proposal but that the noise impact predictions have been determined on the basis of the five proposed silos have a motor with a sound power level of 78 dBA (ie. the noise level of silo motors associated with current interim packing plant). The noise impact assessment report states that a further assessment in regard to this issue will be undertaken at the construction certificate stage including the addition of any needed attenuation measures to ensure noise emission are within the predicted levels.

The EPA considers that through the implementation of reasonable and feasible noise mitigation measures, the operational noise from the proposal will be able to comply with the current noise limits in the EPL. It is therefore recommended that any approval of proposal contain appropriate conditions which requires:

- Implementation of the noise mitigation measures contained in section 7 of the noise impact assessment report. In this regard it is recommended that the proposed container area noise barrier to be erected along the north western, north eastern and south western boundaries be constructed as a permanent structure such as a masonry wall to the recommended heights as the suggested use of movable shipping containers for this purpose is not considered to be a permanent solution.
- A noise validation assessment be undertaken within the first 12 months of operation of the new packing to confirm that noise emissions comply with the predictions in the noise impact assessment report and if not, all reasonable and feasible noise mitigation measures are implement to achieve compliance.

With regards to construction noise, the information contained in the noise impact assessment report predicts that construction noise generated during the construction of the proposal will not comply with the noise management levels (Table 7 of the noise impact assessment report) by up to 4 dB at two of the four nominated receiver locations. The noise impact assessment report does however state that these exceedances will only occur during impact piling activities which is predicted to only take place for a short

duration (2 weeks) during the overall construction phase. It is also noted that a construction noise management plan is to be prepared in accordance with the EPA's *Interim Construction Noise Guideline*.

As such, the EPA considered that the proposed exceedance will not likely result in adverse impact to the overall amenity of the areas surrounding the proposal. However to ensure that any construction noise impacts from the amended packing plant are appropriately managed and provide minimal impact and disruption upon the community, it is recommended that any approval contains appropriate conditions that restricts:

- 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

The information contained in the air quality impact assessment report predicts the proposal will result in a worst case odour ground level concentration (GLC) of 0.4 odour units (ou) and a worst case GLC for total suspended particles (TSP) of 0.16 micrograms per cubic meter (ug/m³) at the nearest sensitive receiver location (Bomaderry). These fall well below the respective impact assessment criteria for odour of 2 ou and TSP of 90 ug/m³ contact in the EPA's *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*.

The EPA notes that while one year worth of weather data has been used in the odour dispersion modelling tool (AERMOD) no comparative analysis of this data set with longer term weather data/trends, particularly with regards to wind direction is included in the air quality impact assessment. Such comparative analysis provides a useful means of validating whether the data set used in the odour dispersion modelling tool is representative of longer term meteorological conditions experienced at the Shoalhaven Starches premises.

While the above deficiency has been identified, given that the packing plant was included as part of the ethanol expansion project approval, the EPA is satisfied that its reconfiguration within the Shoalhaven Starches premises will not result in additional cumulative odour impacts to those previously assessed and determined as part of the expansion approval.

Waste

The EA states that approximately 34,000 tonnes of fill material will be required to be imported to raise the level of the site as part of the construction of the proposed. The EPA notes from the EA that it is intended to use waste material which falls under the Resource Recovery Exemption/Order framework as provided for the *Protection of the Environment Operations Act 1997* and *Protection of the Environment Operations (Waste) Regulation 2014*. The EA further states that where no Resource Recovery Exemption/Order exists for an intended waste material an application will be made to the EPA to create a specific exemption/order.

The EPA encourages the beneficial reuse of waste where it can be demonstrated that a relevant Resource Recovery Exemption/Order is both applicable and all associated conditions are met. To ensure that only waste materials that are suitable for such beneficial resource are imported to the site it is recommended that any approval include an appropriate condition stipulating that only virgin excavated natural material or wastes that comply with a relevant resource recovery exemption/order are permitted to be imported to the site as fill materials.