



# MANILDRA GROUP

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SHOALHAVEN STARCHES PTY LTD - MANILDRA ENERGY AUSTRALIA PTY LTD - MANILDRA FLOUR MILLS PTY LTD –  
MANILDRA STARCHES PTY LTD - MANILDRA SUGARS – HONAN HOLDINGS PTY LTD –  
MANILDRA MILLING CORPORATION - U.S.A.

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17<sup>th</sup> November 2016

Attention: Chris Ritchie  
Deana Burn

Subject: Revision of proposed modification (MOD 9) to Shoalhaven Starches Pty Ltd  
Project Approval MP06\_0228

Reference: Proposed Modification dated March 2016 (Cowman Stoddart Pty Ltd)  
Draft approval MP 06\_0228 MOD 9- Packing Plant  
Harwood Acoustics Night Time Operations Assessment 4 Nov 2016

Dear Chris and Deana,

In response to the draft approval MP 06\_0228 MOD 9 – Packing Plant, Shoalhaven Starches Pty Ltd propose the following changes to the Operating Conditions:

## **Operating Condition 14G. c)**

The Proposed Modification dated March 2016 included a Noise Assessment by Day Design stating (refer section 8.2.5 bullet No. 4) *“there will be no train movements on the spur line that forms part of the container loading area between the night time period of 10 pm to 7 am.”*

The subsequent Operating Conditions 14G. c) issued as a response to the application states *“no train movements or loading of trains occur on the rail spur lines during the night-time period (10pm – 7am)”*

Trains can only enter and leave Shoalhaven Starches facility within operational gaps in the NSW Rail Timetable. This is a significant and ongoing constraint for Shoalhaven Starches operation and business.

Current train movements include the night-time period (10pm to 7am) and this will need to continue and will need to include movement on the spur line otherwise the efficiency and practicality being sought, and the reduced impact of rail crossings on Bolong Rd, all as proposed by the application, will be negated and in-fact exacerbated.

Shoalhaven Starches preferred solution to mitigate the train and loading / unloading noise is to increase the noise barrier wall height and move the south western wall to the outside of the master siding thus placing the spur line as far as necessary entirely inside the noise protected container yard.

With the railway network limitations to consider and an available solution that meets requirements, Shoalhaven Starches Pty Ltd here request revision of the consent to allow train movements on the spur lines at all hours plus loading and unloading at all hours.

#### **Operating Condition 14G. d)**

The Proposed Modification dated March 2016 included a Noise Assessment by Day Design stating (refer section 8.2.5 bullet No. 5) *“during the night time period (10 pm to 7 am) the forklift trucks will only stack two containers high at locations within 10 metres of the wall and only one container high above the ground floor locations more than 10 metres from the wall. No loading of the train in the proposed container loading area will take place during the night time period.”*

The subsequent Operating Conditions 14G. d) issued as a response to the application states *“stacking of containers is limited to a maximum of two containers high within 10m of the noise walls and one container high more that 10m from the noise walls.*

Shoalhaven Starches need to operate the container yard in conjunction with rail operations. This will typically require trains with empty containers entering at night time and departing with full containers by mid-morning thus requiring container handling to occur in the period in between.

If container storage is limited to two containers high adjacent to walls and not stacked at all elsewhere then a practical and efficient operation will not be possible and in-fact the extended travel and the handling for each container will result in extended operations and/or additional container forklifts being required.

Shoalhaven Starches preferred solution is to put into place a completely effective noise barrier enabling three high stacking of containers to occur anywhere in the container yard and at all hours.

Shoalhaven Starches Pty Ltd here requests revision of the consent to allow handling and stacking of all containers to maximum three containers high at any location within the container yard at all hours.

#### **Supporting Information**

The implications for night-time noise has been carefully assessed by Harwood Acoustics (specialist consultants) and the noise control recommendations for night time operations are proposed in order to ensure that the current noise limits per EPL 883 and current regulations are not exceeded.

The report titled Packing Plant and Container Storage Area – Night Time Operations, Shoalhaven Starches, Bolong Rd, Bomaderry, by Harwood Acoustics, dated 4<sup>th</sup> November 2016 was discussed with the EPA and is attached to this letter to support the requested changes currently being reviewed by the NSW EPA.

Regards,

Brian Hanley  
Shoalhaven Starches Pty Ltd