



DOC20/20471-3
Date: 31/1/20

Mr Shaun Williams
Environmental Assessment Officer
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Williams

Re: Shoalhaven Starches Expansion Project Mod 17 (MP06_0228 Mod 17) – EPA Comments

I refer to the request for the Environment Protection Authority's ('EPA') advice on the Statement of Environmental Effects ('SEE') for Modification 17 of the Shoalhaven Starches Expansion Project. Modification 17 proposes to modify the project approval MP06_0228 to relocate the approved location of the Starch Dryer No. 5 baghouse, install a service lift adjacent to the Starch Dryer No. 5, elevate a portion of approved pipework, to change the fuel source for Boilers No. 2 and 4 to a combination of coal and woodchips, and to amend the design specification for silencers to exhaust fans for Flour Mill B.

The EPA has reviewed the SEE and the associated documentation, which includes an Air Quality Assessment. The details of the EPA's review are contained in **Attachment A**. In summary, the EPA recommends that the proponent revise the Air Quality Assessment to provide further clarity on the emissions resulting from the change of fuel source for Boilers No. 2 and 4.

I trust this information is of assistance. If you have any questions or wish to discuss, please contact Amanda Fletcher or myself on (02) 6229 7002.

Yours sincerely

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

JANINE GOODWIN
Unit Head, South East Region
NSW Environment Protection Authority

Contact officer: AMANDA FLETCHER
(02) 6229 7002

Attachment A

Emission estimation for boilers 2 and 4 lacks clarity, and a comparison of emissions from current fuel use with proposed fuel use has not been provided.

The Air Quality Assessment includes a comparison of emission monitoring data for boiler 2 (provided as table 8-1 of the Air Quality Assessment). The comparison shows:

- higher discharge concentrations for sulphur dioxide and nitrogen dioxide when operating on coal than woodchips;
- higher discharge concentrations for particulates and Type 1 and 2 substances when operating on woodchips than coal. The Air Quality Assessment advises that this is due to the testing when operating on woodchips was undertaken prior to the installation of pollution controls (baghouse).

The EPA notes that historical monitoring data for boiler 2 operating on 100% woodchips shows concentrations above current EPL limits for total particulates. Discharge concentrations of 49 mg/m³, 55 mg/m³, 96 mg/m³ are presented as compared with the current EPL limit of 30 mg/m³. As noted above the monitoring results presented were obtained prior to the installation of pollution controls (baghouse). The comparison provides some information, however does not provide information on the potential for a change in air emissions, given that emission estimates for the proposed fuel mix have not been provided and the emission monitoring data for 100% woodchips was undertaken prior to pollution control installation.

The Air Quality Assessment advises that *"no changes have been made to the emissions inventory as the Mod 16 modelled emissions are based on 100% coal and considered to be conservative"*.

However, the Air Quality Assessment:

- does not clearly describe how emission estimates have been derived for boilers 2 and 4;
- does not present emission estimates for the proposed fuel mix of woodchips and coal for boilers 2 and 4;
- does not include a comparison of emission estimates for existing operation (100% coal) and proposed coal/wood chip fuel mix, to clearly indicate any potential changes in emissions.

The EPA notes that a total of 7,000 tonnes per annum of woodchip is planned to be used, displacing 4,400 tonnes per annum of coal. The use of a higher mass quantity of fuel has the potential to increase air emissions for some pollutants, however that is likely to be dependent on fuel composition.

To ensure robust information has been provided for decision making purposes, the EPA recommends that the proponent provide a comparison of emission estimates for existing and proposed fuel mix.

The EPA recommends the proponent revise the Air Quality Assessment to:

- **Provide further clarity on how emission estimates for boilers 2 and boiler 4 have been derived;**
- **Provide a comparison of emission estimates from current fuel use with proposed fuel use;**
- **Where an increase in potential emissions is estimated (based on consideration of the above) the Air Quality Assessment must be revised.**