



DOC20/390361-2
Date: 28/5/20

Mr Shaun Williams
Environmental Assessment Officer
Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Williams

Shoalhaven Starches Mod 18 – Hand Sanitiser Alcohol Production

I refer to the Statement of Environmental Effects ('SEE') and associated documentation for Shoalhaven Starches Expansion Project MP06_0228 Modification Application No. 18 ('Mod 18'). In response to the COVID-19 pandemic, the Federal Government has requested Shoalhaven Starches to increase its production of hand sanitiser. In order to meet this request, Mod 18 proposes to modify the premises by relocating an approved but not yet installed gas fired boiler, extending existing gantries, installing two additional storage tanks, and constructing an undercover storage area.

The EPA notes that the SEE states that the proposed gas fired boiler will have a steam production capacity of 45t/h, instead of the originally approved boiler's steam production capacity of 100t/h. The SEE states that due to this reduction in steam production, there will be reduced air emissions than what was originally approved. However, the EPA notes that the SEE does not contain any information on what the estimated air emission concentrations are for the proposed boiler.

The EPA advises that the proposed boiler will need to meet the Group 6 air emission concentration standards outlined in Schedule 4 of the *Protection of the Environment Operations (Clean Air) Regulation 2010* ('Clean Air Regulation'). In particular, the proponent should ensure that the boiler meets the Group 6 concentration standards for NO_x emissions for gas fired boilers. Post commissioning of the proposed boiler, the proponent should test and analyse the air emissions to ensure they are compliant against the standards set out in the Clean Air Regulation.

I trust this information is of assistance. If you have any questions or wish to discuss, please don't hesitate to contact me or Amanda Fletcher on (02) 6229 7002.

Yours sincerely

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

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

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