



DOC20/20471-18
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Mr Shaun Williams
A/Senior Environmental Assessment Officer
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Williams

Shoalhaven Starches – MP06_0228 Mod 17 Amendments

I refer to the amendments made to Modification 17 of the Shoalhaven Starches Expansion Project to modify the project approval MP06_0228. The amendments to Modification 17 are altering aspects of Modification 16 that were approved on 18 June 2019 and include the increase of building footprints of the Product Dryer Building ('PDB') and the Specialty Products Building ('SPB'), installation of Product Dryer No. 9 within the SPB, the installation of an additional stack to Starch Dryer No. 5, and the addition of bulk chemical storage. These amendments are in addition to the proposal to change the fuel source of Boilers No. 2 and 4, which the Environment Protection Authority ('EPA') has already provided comments on.

The EPA has reviewed the amended Modification 17 and the associated documents, including the revised Air Quality Impact Assessment ('revised AQIA') and Noise Impact Assessment ('revised NIA'). The comments below address only the amended components of Modification 17.

Noise

The revised NIA states that construction noise is predicted to not comply with Noise Management Levels ('NML') in Bomaderry during piling works. These works are expected to exceed the NML by 2dB at Coomera St and 4dB at Meroo St, Bomaderry. In addition, the EPA notes that cumulative noise from the proposal has not been assessed alongside existing operations. Should the proposal be approved, the proponent should ensure that a Construction Noise Management Plan ('CNMP') be prepared prior to construction. The CNMP should contain all reasonable and feasible noise mitigation measures that will be taken to minimise impacts on nearby sensitive receivers.

Air quality

The revised AQIA assesses potential air quality impacts through revised dispersion modelling with the inclusion of the proposed Product Dryer No. 9. The revised dispersion modelling accounts for odour and particulate emissions from the proposed Product Dryer No. 9. The AQIA has accounted for emissions from both Product Dryer No. 9 and Gluten Dryer No. 8 (i.e. both operating in unison, as proposed).

The revised AQIA:

Phone 131 555
Phone +61 2 6229 7002
(from outside NSW)

Fax +61 2 6229 7006
TTY 133 677
ABN 43 692 285 758

PO Box 622
Queanbeyan
NSW 2620 Australia

Level 3
11 Farrer Place
Queanbeyan NSW
2620 Australia

Queanbeyan@epa.nsw.gov.au
www.epa.nsw.gov.au

- Does not predict an increase in odour concentrations at offsite residential receptors from the 2009 base case.
- Predicts an increase in odour concentrations at offsite commercial/industrial receptors from the previous Mod 16 scenario. The AQIA advises that the increase in predicted offsite odour concentrations is attributed to the higher quarterly results (i.e. odour monitoring data for existing sources) particularly the pellet plant stack.
- Does not predict an increase in ground level concentrations for particulates from the original Mod 17 air quality impact assessment

In the context of the proposed modification, the proposed dryer represents a small contribution in total odour and particulate emissions from the premises. The proposed dryer accounts for approximately 2% of total odour emissions assessed and <1% of total particulates assessed.

The EPA do not currently receive odour complaints from existing operations, as such the modelled change in odour concentrations, largely due to changes in modelled odour emissions from existing sources, is not considered a significant issue. The change in odour emissions from the pellet exhaust stack could present an issue where off-site odour complaints occur.

EPA advises that based on the small contribution to assessed modelled emissions from the proposed dryer, and that there is no material change in predicted offsite ground level concentrations then the proposed amendment does not change the outcomes of the previous assessment information for Mod 17. As such, EPA's previous recommended conditions for Mod 17 are appropriate for the amended modification.

If you have any questions or wish to discuss, please contact myself or Amanda Fletcher on (02) 6229 7002.

Yours sincerely



JANINE GOODWIN
Unit Head, Regulatory Operations Regional South

Contact officer: AMANDA FLETCHER
(02) 6229 7002