

Mr Brian Hanley  
Manager, Energy & Sustainability

SHOALHAVEN STARCHES PTY LTD  
36  
BOLONG ROAD  
BOMADERRY 2541

22/10/2020

Dear Mr Hanley

Shoalhaven Starches Expansion Project Modification 19 (06\_0228 Mod-19)  
**Request for Additional Information**

I refer to the modification application for the Shoalhaven Starches Expansion Project (06\_0228 Mod-19). The notification period for the abovementioned modification application ended on Friday 16 October 2020. After careful consideration, the Department is requesting that you provide additional information. In addition, submissions received by the Department on the modification application are available on the Department's website at <https://www.planningportal.nsw.gov.au/major-projects/project/40181>.

Please note, the Department is still awaiting comment from Shoalhaven City Council, the NSW Environment Protection Authority and Fire & Rescue NSW. Comments will be forward to you upon receipt by the Department.

You are requested to provide a response to submissions made and submit additional information that effectively addresses the issues identified in Attachment 1.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Friday 27 November 2020. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Shaun Williams, who can be contacted on (02) 8275 1345/ at [shaun.williams@planning.nsw.gov.au](mailto:shaun.williams@planning.nsw.gov.au).

Yours sincerely,



Chris Ritchie  
Director  
Industry Assessments

Attached: Request for Additional Information

# Attachment 1: Request for Additional Information

## Air Quality

1. The Statement of Environmental Effects (SEE) notes the PM<sub>10</sub> and PM<sub>2.5</sub> 24 hour criteria are exceeded at a commercial receptor which is attributed to high background concentrations. The Department requests more information be provided on the background particulate matter concentration sources recorded in the assessment. The Applicant should identify if background sources are attributed to site operations and any measures being undertaken to manage or mitigate high background particulate matter concentrations.
2. The SEE identified increases in predicted odour levels at commercial receptors due to higher quarterly sampling results attributed mainly to the site's boiler house. The Department requests the Applicant provide further details on the cause of higher quarterly sampling results of odour levels and the measures being implemented to manage or mitigate odour levels.

## Substation Relocation

3. The modification application includes the requested relocation of an approved electrical substation due to construction constraints at the approved location. The Department requests further information on the aforementioned construction constraints and further justification for the electrical substation relocation.

## Visual Impact

4. The SEE identifies the proposed new distillery columns will have a maximum building height of 54 metres (m) but would not exceed the existing tallest site infrastructure. However, the SEE identifies the tallest existing site infrastructure to be the boiler house stack at 53.7 m, being less than the proposed new distillery column. The Department requests further clarification on the maximum height of existing site structures. If the proposed new distillery column is higher than all existing site infrastructure, further justification is required for the proposed height and the associated visual impacts arising from the modification.

## General

The employment generation numbers and capital investment value (CIV) related to the modification works must be provided.