



DOC21/805693-2

Mr Shaun Williams
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Williams

**Shoalhaven Starches – Mod 21 – Modification to Approved Packing Plant – EPA Comments
on Noise Impact Assessment**

Thank you for the request for advice, requesting the review by the NSW Environment Protection Authority (EPA) of the Statement of Environmental Effects (SEE) for the proposed Modification to the Approved Packing Plant (MP06_0228-Mod-21) at Shoalhaven Starches, located at 160 Bolong Road, Bomaderry.

The EPA has reviewed the following documents:

- *Statement of Environmental Effects – Proposed Modification to Approved Packing Plant and Other Works* – Cowman Stoddart Pty Ltd – August 2021
- *Environmental Noise Impact Assessment Shoalhaven Starches Proposed Modification to Shoalhaven Starches Expansion Project 06_0228 – Packing Plant Alterations and Other Works* – Harwood Acoustics Acoustical Consulting – 17 June 2021

The EPA understand the proposal is primarily to modify the approved but not yet constructed Packing Plant, to allow the ability to package an increased amount of specialty products at the premises, through the following modifications:

- Installation of an additional 16 product storage silos and relocation of the already approved 7 product storage silos;
- Installation of an additional 8 packer feed bins;
- Reconfiguration of the Packing Plant footprint and layout of the carpark;
- Addition of a third rail spur; and
- Addition of a train tunnel.

The proposal also includes the following modifications to the premises that are not related to the Packing Plant:

- Installation of an additional wastewater buffer tank at the Wastewater Treatment Plant;
- Installation of an Ethanol Nitrogen Generator and associated storage vessels;
- Installation of an additional Indirect Cooking Plant; and
- Installation of two additional fermentation tanks.

The premises is currently subject to Environment Protection Licence No. 883 under section 43 of the *Protection of the Environment Operations Act 1997* (POEO Act) for Agricultural Processing, Chemical Production, and Chemical Storage under clauses 2, 8 and 9 respectively of Schedule 1 of the POEO Act.

The EPA has reviewed the SEE and notes that the SEE does not provide information required by the EPA for its assessment. As such, the EPA requests additional information to be able to assess the proposal.

The EPA has the following additional comments and recommendations:

1. Matters to be addressed prior to determination

a. Modifying Factor Assessment

Section 4.2.3 presents the "Modifying Factor Assessment". The assessment states 'no modifying factor adjustments are applicable' however it only appears to consider tonality and low frequency noise.

The EPA requests that the proponent provide information on whether intermittency has been considered (for example are any of the mechanical plant likely to cycle on and off).

The EPA also requests the proponent provide more information to support the claim that 'the noise levels are not expected to contain tonal characteristics at any receptor location'.

b. Recommended Noise Controls

Section 6 to the NIA includes recommended noise controls. The EPA recommends that Section 6 be expanded to include: "Any ventilation fans, blowers and pumps should be designed to not exhibit tonal or low frequency noise, with an appropriate one third octave assessment undertaken in accordance with the *Noise Policy for Industry*".

2. Matters to be addressed with conditions

a. Design and Specifications of Equipment

Due to the limited oversight over the design and construction of the modified plant, the EPA recommends that DPIE include suitable conditions in any modified consent to ensure that the performance of the modified plant meets the performance requirements outlined in the NIA. Suitable conditions could be framed along the following lines:

- Plans and specifications submitted to support an application for a Construction Certificate pursuant to the Environmental Planning and Assessment Act 1979 shall detail the design measures and construction materials required to satisfy the noise performance requirements outlined in acoustic report *Proposed Modification to Shoalhaven Starches Expansion Project 06_0228 – Packing Plant Alterations and Other Works – Modification 21. Environmental Noise Impact Assessment* (by Harwood Acoustics ref: 2103003E-R, dated 17 June 2021). The plans and specifications shall be endorsed by a suitable qualified and experienced acoustical professional confirming that the performance objectives of the noise assessment will be achieved by the works outlined in the submitted plans and specifications.
- An Occupation Certificate for the works shall not be issued without confirmation from a suitable qualified and experienced acoustical professional that the works have been designed and constructed, and capable of being operated in a manner that satisfies the design objectives outlined in the *Proposed Modification to Shoalhaven Starches Expansion Project 06_0228 – Packing Plant Alterations and Other Works – Modification 21. Environmental Noise Impact Assessment* (by Harwood Acoustics ref: 2103003E-R, dated 17 June 2021).

If you have any questions about this request, please contact myself or Amanda Fletcher on (02) 6229 7002 or via email at queanbeyan@epa.nsw.gov.au.

Yours sincerely

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

05.10.2021

JANINE GOODWIN
Unit Head Regulatory Operations
Regional South