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Dear Mr Williams

**Shoalhaven Starches – Mod 21 – Modification to Approved Packing Plant – EPA Comments on Revised 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:

- *Modification 21 to Shoalhaven Starches Expansion Project 06\_0228 – Additional Information Request – Environmental Noise Assessment* – Harwood Acoustics Acoustical Consulting – 15 February 2022
- *Environmental Noise Impact Assessment Shoalhaven Starches Proposed Modification to Shoalhaven Starches Expansion Project 06\_0228 – Packing Plant Alterations and Other Works – Modification 21* – Harwood Acoustics Acoustical Consulting – 15 February 2022

The above documents were prepared in response to EPA's comments on the proposed modification dated 27 October 2021.

The EPA notes that the revised Noise Impact Assessment (revised NIA) does not adequately address the EPA's comments. Attachment A to this letter contains further detail on the issues.

However, the EPA also notes that Shoalhaven Starches has committed to developing a comprehensive noise model of the entire Shoalhaven Starches site including existing and proposed noise sources. The EPA emphasises that the model must incorporate an assessment of annoying characteristics in accordance with the guidance in the NPfI.

Whilst the EPA considers that the assessment in the revised NIA is inadequate, it is noted that the development consent includes conditions related to design verification. Specifically, Conditions 14F, 14G, 14H, 14I and 14M relate to Mod 9, which is the initial modification that approved the packing plant.

In this regard and acknowledging the commitment to developing a comprehensive noise model, the EPA recommends that the Department of Planning retain these noise-related conditions that relate to the packing plant and apply them to Mod 21. The EPA notes that Section 7.4 of the revised NIA indicates that during the design verification stage, prior to construction, the potential for annoying characteristics will be further assessed. The EPA strongly advises that this assessment be done in accordance with the guidance and intent of the NPfI,

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

Yours sincerely

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

03/03/2022

**JANINE GOODWIN**  
**Unit Head**  
**Regulatory Operations Regional**

## **Attachment A**

### **Annoying Noise Characteristics**

Table C1 in Fact Sheet C of the NPfI requires an assessment of low frequency noise in one-third octaves in the range 10 Hz to 160 Hz. To assess the potential for low frequency noise, Table 5 of the revised NIA indicates the predicted noise level at receiver R3 in octave band frequencies from 63 Hz to 8000 Hz, which is not consistent with the intent of the NPfI.

With the information presented in the revised NIA, it is not clear whether the difference between the C weighted and A weighted noise levels would be less than 15 dB if lower frequencies below 63 Hz were included in the assessment. An example method for determining low frequency noise was published in Acoustics Australia and can be found here: <https://doi.org/10.1007/s40857-020-00199-x>

Similarly, for the tonality assessment, the one third octave measurements inside the packing plant (Figure 3) and predicted at the receiver (Figure 4) do not include an assessment below 50 Hz. Table C1 of the NPfI includes frequencies down to 25 Hz for the tonality assessment. The tonality assessment also only provides details on the Baghouse motors, not any other noise sources in the proposed modification and states that the measurement of the existing packing plant does not include “warning alarms, sirens or tonal reversing alarms of any forklifts or trucks”, which the EPA notes are potentially tonal sources.