

Mr Brian Hanley  
Manager, Energy & Sustainability

SHOALHAVEN STARCHES PTY LTD  
Suite 14, 31 Kinghorne Street Nowra

Nowra New South Wales 2541

23/07/2020

Dear Mr Hanley

Shoalhaven Starches Expansion Project MOD 17 (06\_0228-MOD 17)  
**Request for Additional Information**

I refer to the amended modification application to the Shoalhaven Starches Expansion Project MOD 17 (06\_0228-MOD 17). The amended modification application was notified to the relevant government agencies for comment which are available on the Department's website at <https://www.planningportal.nsw.gov.au/major-projects>.

After careful consideration, the Department is requesting that you provide additional information.

You are requested to 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 Fri 21 August 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: Attachment 1

## Attachment 1

The following comments are requested by the Department for response:

- It is noted that the Preliminary Hazard Analysis (PHA) report (dated 18 June 2020) prepared by Pinnacle Risk Management Pty Ltd has been revised to assess the changes proposed in Modification 17. The Department notes the PHA details “the chemical storage tanks (caustic soda, hydrochloric acid and cationic reagent) are to be relocated to the south of the GD8 building” however, the addendum Statement of Environmental Effects (SEE) prepared by Cowman Stoddart Pty Ltd (dated 19 June 2020) describes additional bulk chemical storage to the south of the PDB and SPB buildings.
- Whilst the PHA concluded that the modifications presented no significant increase in the risk profile of the site, it is unclear if consideration was given to risks associated with the provisions for future bulk chemical storage noted in *Section 2.3 Additional Bulk Chemical Storage* of the Addendum.
- It is recommended that clarification be provided as to whether the Modifications are proposing additional bulk chemical storage, or relocation of the existing; caustic soda, hydrochloric acid, and cationic reagent storage.
- If the bulk chemical storage tanks are not to be relocated, please provide the details of the additional chemical storage tanks including the chemicals to be stored within these tanks, the tank capacity and the proposed location. In addition, please provide comment on the associated safeguards and risks if these are additional bulk storage tanks