

Shoalhaven Starches Action Plan

Independent Environmental Audit, Project Approval 06_0228, Edge Environment Pty Ltd, 14th July 2016

Tables 1 and 2 shows the non-compliances and opportunities for improvement received during the 2016 audit and the proposed corrective actions by Shoalhaven Starches to address the auditor's recommendations.

Table 1. Action Plan to Address Non-compliances - 2016 Independent Environmental Audit

NC No.	Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Timeframe	Status
1	2	8	<p>The Proponent shall ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA.</p> <p>Notes:</p> <ul style="list-style-type: none"> • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project. 	Construction certificates were not obtained prior to the construction of four silos on site in relation to MOD 5.	Ensure approvals (including construction certificates) are obtained for all new construction work on site	Project Manager's and Engineers have been reminded to obtain construction certificates before commencing construction.		Complete.
2	2	8B	<p>8B. Within three (3) months of the date of approval of MP 06_0228 MOD 5, the Proponent shall:</p> <p>a) obtain and provide copies to the Secretary of all necessary building certificate(s) from Council for any structures proposed as part of MP 06_0228 MOD 5 that have been constructed or partially constructed prior to the approval of MP 06_0228 MOD 5; and</p> <p>b) ensure that all new structures, and any alterations or additions to existing structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.</p>	Documentation was not obtained within three months of the date of approval of MOD 5	Ensure documentation required under this approval is submitted within the required timeframes	<p>Obtain Building Certificate (BC) for DDG Pellet Plant (MOD 4 & 5)</p> <p>Project Manager's and Engineers have been reminded to obtain construction certificates before commencing construction.</p>		<p>BC application submitted to Council on 13-1-16.</p> <p>Documentation as requested by Council submitted on 29-4-16.</p> <p>Follow-up emails sent 10-6-16 and 4-7-16.</p> <p>Waiting on BC from Council.</p>
3	3	12	The Proponent shall ensure that noise from the project does not exceed the noise limits in Table 2.	One instance was recorded at 'Nobblers Lane' (August 2015) in which EPA Noise Limits were not complied with	Review noise management controls to ensure that there are no exceedances of the stipulated noise limits	Review complete. Gluten Dryer silencer to be replaced.	Sep 2016	Equipment on order.

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4	3	15	Except as may be expressly provided in an EPL for the project, the Proponent shall: a) comply with Section 120 of the POEO Act; and b) not discharge any wastewater, including treated wastewater to the Shoalhaven River.	Starch was discharged to Shoalhaven River on the 19th of March 2014	Review wastewater discharge controls to ensure there are no discharge incidents that do not comply with this approval or the POEO Act	Incident report submitted to EPA on 24-3-14. Review of incident & implementation of corrective actions complete.		Complete. EPA letter dated 2-5-14 closing out incident.
5	3	17	The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or DECC's Storing and Handling Liquids: Environmental Protection manual. Note: To avoid any doubt, this condition does not apply to the fermenters on site.	Not all chemicals were stored in bunded areas during site visit.	Review bunding on site and ensure all chemicals and fuels are stored in appropriately bunded areas	Undertake review of bunding on site.	Dec 2016	Review commenced.
6	3	27C	The Proponent shall remove the informal access point located to the east of Access Point 1 and reinstate the road verge to the satisfaction of Council, by the end of April 2013.	The access point was removed. However no evidence of Council satisfaction was received.	Ensure documentation required under this approval is submitted within the required timeframes	Send letter to Council advising that access road has been closed off.	July 2016	Complete. Email sent 12-5-16. Council approval email 30-5-16
7	3	31	31. The Proponent shall: a) ensure that all internal roads and parking on site complies with AS2890.1:2004 and AS2890.2:2002, or their latest versions; b) construct at least 60 new parking spaces on the factory site, in accordance with the plans in Appendix 2C, by the end of April 2013; c) construct at least 30 new parking spaces at the proposed packing plant prior to the commencement of operations at the plant; and d) ensure that pedestrian access and car parking complies with the BCA; to the satisfaction of the Secretary.	Council approval has not been obtained. Noted that during a site visit by Andrew Lissenden (Council) in February 2016 it was indicated that a response will be provided to SS in relation to on-site car parking & required road upgrade works. This has not yet been received.	Ensure documentation required under this approval is submitted within the required timeframes	Awaiting response from Council.		Follow-up email sent to Council on 6-5-16 and 4-7-16. Awaiting response from Council.

NC No.	Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Timeframe	Status
8	3	35	The Proponent shall implement all reasonable and feasible recommendations in the rail level crossing safety assessment to the satisfaction of the Secretary.	Secretary approval has not been obtained (not followed up from last audit)	Ensure documentation required under this approval is submitted within the required timeframes	Send rail level crossing information to the Secretary for approval.	July 2016	Information sent 13-5-16. Waiting on Secretary's approval.
9	3	35A	The Proponent shall ensure that the temporary car park and its access described in MOD 6: a) is designed and constructed to the satisfaction of Council and in accordance with AS2890:2009 Parking Facilities and AS1158:2010 Lighting for Roads and Public Spaces, or their latest versions; b) is used for light vehicles only, with the exception of heavy vehicles used to construct the temporary car park; c) is removed following the completion of construction of the No. 5 starch dryer at the Moorehouse site as described in MOD 6; d) is not used for the storage of plant, equipment or materials at any time.	Council approval has not been obtained	Ensure documentation required under this approval is submitted within the required timeframes	Send car park information to Council.	July 2016	Letter being prepared.
10	3	45	45. The Proponent shall: a) commence landscaping as proposed in the Landscape Plans in Appendix 2C within 6 weeks of commencing construction of the car park described in MOD 3; b) update the Vegetation Management Plan for the project, in consultation with Council, to include the Landscape Plan in Appendix 2C, including details of the measures to be implemented to ensure that landscaping is maintained for the life of the project; and c) submit the updated Vegetation Management Plan to the Secretary for approval, by the end of April 2013.	c) Failure to submit Vegetation Management Plan by the end of April 2013. b) the VMP has now been updated to the approval of Planning	Ensure documentation required under this approval is submitted within the required timeframes	Updated LVMP submitted to the Secretary for approval on 31-7-2015.		Awaiting approval from Secretary.

Table 2. Action Plan to Address Opportunities for Improvement - 2016 Independent Environmental Audit

OBS No.	Sch.	Cond.	Opportunity for Improvement	Auditors Justification	Shoalhaven Starches Action Plan	Timeframe	Status
1	3	41	Consider undertaking a waste audit or some other task appropriate for measuring the effectiveness of waste management measures in place and identifying any opportunities for improved processes.	An opportunity exists to determine the effectiveness of existing waste management measures on site and whether there is any scope to improve resource recovery.	Conduct review of current waste management system to identify opportunities to improve resource recovery.	Dec-16	Review commenced.
2	3	19	Whilst still generally intact and functional, a number of areas on the site contained sediment fencing that was in need of replacement. Auditor recommends a program of gradual replacement of sediment fences commencing around the DDG plant	Effective sediment controls provide an important barrier to prevent pollution of nearby waterways during storm events.	Inspect & replace sediment fencing as required.	Dec-16	Incomplete
3	3	8	Update truck driver induction to include requirement to not track dirt onto the public road network	Existing induction appears to have been effective to date, however there exists an opportunity to more clearly articulate the requirements for not tracking dirt onto the public road network.	Update truck driver site induction training to include this requirement.	Oct-16	Incomplete
4	3	12	Ensure that silencers are cleaned and maintained properly on the Gluten Dryer discharge outlets as recommended in August 2015 report.	Infrequent cleaning of the silencers has resulted in an exceedance of the noise limits for the approval.	Review current maintenance & inspection program of gluten dryer silencers and implement recommendations from the review.	Dec-16	In progress.
5	3	13	Keep records of all inductions to evidence staff and contractors are given this information	This is an important means of evidencing ongoing compliance with the training and awareness requirements of the approval (and management system).	Project Manager's & Engineer's reminded to maintain training records for contractors e.g. evidence of hand-over of site specific project management plans.		Complete