

Shoalhaven Starches Action Plan

Independent Environmental Audit, Project Approval 06-0228, SLR Consulting Pty Ltd, 30 September 2013

Tables 1 and 2 summarise the non-compliances and opportunities for improvement received during the audit and the proposed corrective actions by Shoalhaven Starches to address the auditors recommendations.

For each auditor's recommendation to *'revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed'*, Shoalhaven Starches will include the relevant compliance requirement into the EMS compliance management system program (Fast Track) to ensure follow-up actions are more effectively managed.

Table 1. Audit Non-compliances

Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Responsibility	Timeframe	Status
2	4	The Proponent shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of any reports, plans, strategies, programs or correspondence...	There were some instances where the Proponent was unable to demonstrate full compliance with a requirement by the Director General. It was considered that these were generally minor issues that reflected management system breakdown rather than on any broader suggestion of inaction. That is, the auditor considered that Shoalhaven Starches generally endeavoured to comply with reasonable requirement/s of the Director-General.	Ensure all requirements issued by the Director-General are fully complied with. Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Compliance requirements from the Director-General will be included in EMS to ensure follow-up actions are more effectively managed.	Project Manager & QA/Environmental Coordinator	Ongoing	Complete
	6	The Proponent must not produce on site: a) more than 265,000 tonnes of industrial grade flour per year; and b) more than 300 million litres of ethanol per year, subject to (2) below...	Production of ethanol was increased above the volumes permitted in the staged approval	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Shoalhaven Starches will comply with production limits of approval.	Site Manager	Ongoing	Complete

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7		The Proponent may apply to the Director-General for approval to increase ethanol production up to the rate of 200 million litres of ethanol a year on site if – a) the mandatory odour controls listed in Appendix 3 to this Approval have been implemented...	Production of ethanol was increased above the volumes permitted in the staged approval.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Shoalhaven Starches will comply with production limits of approval.	Site Manager	Ongoing	Complete
8A		Within 2 months of the date of the approval of MP 06_0228 MOD 2, the Proponent shall: a) obtain and provide copies to the Director-General all necessary building certificate(s) from Shoalhaven City Council....	The required information was not provided to the Director-General	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Shoalhaven Starches to submit MOD 2 building certificate(s) to Director-General for approval.	QA/Environmental Coordinator	March 2014	Complete. (Submitted 21-2-2014)
3	1	The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	Offensive odours were detected emanating from Pond 4 due to a pond cover not being in place.	Ensure odour management controls are implemented, maintained in working order, and meet Director-General or EPA requirements.	Odour management controls will continue to be implemented & maintained to ensure compliance is met.	Site Manager	Ongoing	Complete. Pond 4 cover installed on 21 st May 2010
4A		Prior to increasing ethanol production the Odour Management Plan for the project must be updated to the satisfaction of the Director General to include the additional Appendix 3 mandatory odour controls specified in the modification approval MOD 1 – Deletion of DDG Pelletiser.	No evidence that the revised plan has been endorsed by the Director General.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Submit updated Odour Management Plan to the Director-General for approval.	QA/Environmental Coordinator	March 2014	Completed. (submitted with Annual Report 2014)
6		Within 6 weeks of the completion of this audit, the Proponent shall submit a copy of the audit report to both OEH and the Department with a response to any recommendations contained in the audit report.	No evidence of submission to the Director-General with response to recommendations.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Response to the audit recommendations will be sent to the relevant Departments (i.e. this document)	Site Manager	November 2013	Complete. (Submitted 11-10-2013)

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10		The Proponent shall prepare and implement an Air Quality Monitoring Program for the project to the satisfaction of the Director-General	Evidence of consultation with OEH for this procedure was not provided.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Shoalhaven Starches will ensure evidence of consultation is maintained.	Project Manager	As required	Complete
12		The Proponent shall ensure that noise from the project does not exceed the noise limits in Table 2.	One instance was recorded in which Shoalhaven Starches did not comply with the noise limits in Table 2	Ensure noise management controls are implemented, maintained, and hours of operation are adhered to.	Investigation is underway into the cause of the noise non-compliance. Implement corrective actions to address non-compliance.	Environment / Technical Manager	March 2014	Complete. Gluten discharge ducts cleaned & follow-up noise testing in Jan 2014 within noise limits.
14		The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Director-General.	The plan was not initially submitted within 3 months of the approval.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Plan submitted late. No further action required. N.B. If projects are postponed, Shoalhaven Starches to request extension of time for submission of documents.		N/A Plan submitted	Complete
22		The Proponent shall prepare and implement a Stormwater Management Plan for the project to the satisfaction of the Director-General	The plan was prepared to the satisfaction of the Director-General, however record of Council consultation was not kept.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Shoalhaven Starches will ensure evidence of consultation is maintained.	QA/Environmental Coordinator	As required	Complete.

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27A		The Proponent shall provide works-as-executed plans to the Director-General and Council...	The original plans were submitted to the Director-General by 31 October 2012, however not to Council. Discussions are currently underway to finalise the requirements of this condition	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Works-as-executed plans submitted to Council on 22-8-2013. Letter dated 23-8-2013 re: Project Approval 06_0228 Mods 1, 2 & 3 sent to Council requesting approval of completed works. Shoalhaven Starches to consult with Council and RMS on status of approval.	Energy & Sustainability Manager	March 2014	Plans submitted on 22-8-2013. No response from Council.
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.	Whilst the works have been undertaken as required by the condition, no evidence of Council satisfaction was provided.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Works-as-executed plans submitted to Council on 22-8-2013. Letter dated 23-8-2013 re: Project Approval 06_0228 Mods 1, 2 & 3 sent to Council requesting approval of completed works. Shoalhaven Starches to consult with Council and RMS on status of approval.	Energy & Sustainability Manager	March 2014	Complete

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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.; and c) construct at least 30 new parking spaces at the proposed packing plant prior to the commencement of operations at the plant, to the satisfaction of the Director-General.	Works are not currently in compliance with the requirements of this condition, however approval has been requested from Council that internal roads/parking not be required to meet AS2890.1:2004 and AS2890.2:2002, or their latest versions.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed. Where necessary seek approval for extension of time for compliance requirements when a requirement is first identified as having potential for modification.	Letter dated 23-8-2013 re: Project Approval 06_0228 Mods 1, 2 & 3 sent to Council requesting approval of completed works. Shoalhaven Starches to consult with Council on status of approval.	Energy & Sustainability Manager	March 2014	Awaiting response from Council.
35		The Proponent shall implement all reasonable and feasible recommendations in the rail level crossing safety assessment to the satisfaction of the Director-General.	Evidence of Director-General satisfaction of the implementation of these works has not been obtained.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Compliance requirements will be included in EMS.	QA/Environmental Coordinator	March 2014	Complete
36		The Proponent shall prepare and implement a Construction Safety Study in accordance with the Department's Hazardous Industry Planning Advisory Paper No.7 - Construction Safety Guidelines, for the Project to the satisfaction of the Director-General.	An initial study has been submitted, however an addendum required by the Director-General has not yet been provided.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Study submitted, however addendum as required by the Director-General was not completed. No further action required. Shoalhaven Starches will ensure future Director-General requests are implemented.	Project Manager & QA/Environmental Coordinator	As required	Complete

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37A		The Proponent shall prepare and implement a Construction Safety Study in accordance with the Department's Hazardous Industry Planning Advisory Paper No.7 - Construction Safety Guidelines, for MP 06_0228 MOD 2 to the satisfaction of the Director-General	The Study was not updated as required.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Construction Safety Study will be prepared prior to construction of any future works under MOD 2.	Project Manager	Prior to construction of future MOD 2 works.	Complete. CSS submitted 28-8-2014.
38		The Proponent shall prepare and implement the following to the satisfaction of the Director-General: a) an updated Fire Safety Study for the project as modified by MP 06_0228 MOD 2 prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No.2 - Fire Safety Study Guidelines and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems...	Requirements (a) and (e) were not updated as required for MOD 2. Revised dates for new submissions have now been agreed with planning	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	a) Updated Fire Safety Study submitted to the Director-General and NSW Fire & Rescue on 17-9-2013. Shoalhaven Starches to follow-up on status of approval. e) Emergency Plan will be updated & submitted to the Director-General for approval.	QA/Environmental Coordinator QA/Environmental Coordinator	March 2014 25-11-2013	Complete. (submitted 17-9-2013) Updated (Rev. E) submitted 18-12-2013. Complete. (submitted 1-11-2013)
39A		The Proponent shall prepare and implement the following to the satisfaction of the Director-General: a) a Hazard and Operability Study for MP 06_0228 MOD 2.. b) a Final Hazards Analysis (FHA) for MP 06_0228 MOD 2	Studies not updated prior to commissioning. The studies are being updated but have not yet been completed.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	a) Hazard & Operability (HAZOP) Study has been completed & submitted to the Director-General on 8-10-2013 for approval. b) Final Hazard Analysis (FHA) will be completed & submitted to the Director-General for approval. c) Shoalhaven Starches to follow-up on status of approval of HAZOP & FHA.	QA/Environmental Coordinator QA/Environmental Coordinator QA/Environmental Coordinator	Complete 25-11-2013 March 2014	Complete (approved 7-11-2013) Complete. (submitted 8-11-2013) Complete. (email sent 31-1-2014)

Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Responsibility	Timeframe	Status
39B		Twelve months after the commencement of operations of MP 06_0228 MOD 2 and every three years thereafter, or at such intervals as the Director General may agree, the Proponent shall carry out a comprehensive Hazard Audit of the project as modified by MP 06_0228 MOD 2...	The audit has not yet been undertaken.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Hazard Audit will be completed & submitted to the relevant Departments.	WHS & Risk Manager	March 2014	Complete. (submitted 27-3-2014)
43		The Proponent shall prepare and implement a Vegetation Management Plan for the project to the satisfaction of the Director-General.	Whilst the plan has been developed and approved by the Director-General, the requirement to submit annual reports detailing the implementation of the plan has not been met each year.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Implementation of landscape & vegetation plans will be submitted with the Annual Report (as per Sch.4, cond.3)	QA/Environmental Coordinator	March 2014	Complete
44		The Proponent shall, to the satisfaction of the Director-General, ensure that: a) all landscaping works proposed in the Landscape Plan/s in Appendix 2B of this approval are completed within 6 months of the date of approval of MP 06_0228 MOD 2 in consultation with Council; b) the Landscape Plan/s in Appendix 2B of this approval are incorporated into the approved Landscaping and Vegetation Management Plan for the project; and c) suitable measures are in place and detailed in the Landscaping and Vegetation Management Plan to ensure vegetation at the site is maintained for the life of the project.	The landscaping works were not completed within the required timeframe. It is noted that the construction works are not yet completed, and it is therefore not practical to complete the works in all areas.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	a) Landscaping along Bolong Rd will be implemented in a staged approach (however it is noted that planting is not practical in areas where MOD 2 works have not yet commenced). b) Landscape Plans will be incorporated into the EMS. c) Landscaping and Vegetation is maintained by contractors on an ongoing basis.	QA/Environmental Coordinator QA/Environmental Coordinator QA/Environmental Coordinator	Commence landscape works along Bolong Rd by March 2014 Complete Ongoing	Commenced. Due for completion by Dec 2015. Complete Complete

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4	2	The Proponent shall notify the Director-General of any incidents associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Director-General with a detailed written report on the incident, and any action that has subsequently been taken in relation to this incident.	Only one incident has been reported to the Director-General; notification to the Director-General was not provided within 7 days of the date of the incident.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Update incident reporting procedure to include notification to the Director-General for pollution incidents reported to the EPA (& other relevant authorities).	QA/Environmental Coordinator	Complete	Complete.
	3	The Proponent shall submit an Annual Report to the Director-General and other relevant agencies.	The reports required by this condition are not being submitted.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	Submit EPA Annual Return to the Director-General, with additional information as required to comply with conditions in the consent that stipulate annual reporting.	QA/Environmental Coordinator	March 2014	Complete

Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Responsibility	Timeframe	Status
5A		<p>Within 3 months of:</p> <p>a) a modification to this approval; and/or</p> <p>b) any audit required under this approval,</p> <p>the Proponent must review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Director-General.</p> <p>Note: this is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	Evidence of all plans being reviewed and revised following modifications to this approval was not available.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	<p>Update EMS procedure(s) to ensure future modifications to this approval or audits required under this approval, that strategies / plans / programs are reviewed & updated as required.</p> <p>N.B. measures to improve environmental performance in the strategies, plans & programs required under this approval have been incorporated into the EMS.</p>	QA/Environmental Coordinator	March 2014	Complete

Sch.	Cond.	Requirement (Summary)	Auditors comment	Auditors recommendation	Shoalhaven Starches Action Plan	Responsibility	Timeframe	Status
6		<p>Within 3 months of the approval of any strategy / plan / program required under this approval (or any subsequent revision of these strategies / plans / programs), or the completion of the audits or annual reports required under this approval, the Proponent shall provide a copy of the relevant documents/data to:</p> <p>a) the relevant agencies, and b) any interested party upon request.</p>	Not all finalised plans were submitted to the relevant stakeholders as required.	Revise the Shoalhaven Starches EMS to ensure that compliance requirements are more effectively managed.	<p>a) Audits & annual reports will be submitted to the relevant agencies.</p> <p>b) Whilst Shoalhaven Starches will endeavour to provide relevant documents/data to any interested party on request, information deemed confidential will not be provided.</p> <p>c) Update EMS procedure(s) to include submission of documents to the relevant agencies.</p>	<p>QA/Environmental Coordinator</p> <p>Environment / Technical Manager</p> <p>QA/Environmental Coordinator</p>	<p>As required</p> <p>As required</p> <p>March 2014</p>	<p>Complete</p> <p>Complete (no requests received)</p> <p>Complete</p>

Table 2. Opportunities for improvement

Opportunity	Justification	Manildra Action Plan	Responsibility	Timeframe	Status
Add an additional layer to the maintenance system so logged maintenance issues which have the potential to harm the environment can be 'flagged' to ensure the plant or equipment is not used prior to its repair	<p>Ensuring that maintenance issues that have the potential to cause environmental harm are correctly managed will reduce the risk of these causing environmental harm</p> <p>This system would also provide evidence to the Director-General or other interested stakeholders that Shoalhaven Starches are aware of particular issues and have a program for rectifying them should an incident occur. For example, if an odour control device developed a mechanical fault which resulted in the emission of offensive odours two or three days after development of the fault, demonstration (by records) that the fault was known and a program was in place to rectify it may result in a more favourable view of the incident by the Director-General and / or the EPA .</p>	Job tasks & equipment in the Maintenance System that are critical environmental controls which have the potential to harm the environment if they are not maintained correctly will be reviewed & prioritised.	Maintenance Planner	March 2014	Complete
<p>Ensure all chemicals are stored in bunded areas regardless of whether they are stored within the broader internal drainage system that drains to the waste water treatment plant.</p> <p>Improve the housekeeping in the northwest section of the site where a number of drums and containers are stored haphazardly.</p>	Whilst housekeeping across the site was generally of a good standard, there were a small number of areas that could be improved.	Re-locate drums and containers inside bunded areas, & improve general housekeeping across the site.	Plant Managers.	March 2014	Complete
Upgrade the stormwater detention basin in the northwest section of the site.	The stormwater detention basin requires upgrade as it did not appear capable of minimising pollutant load in stormwater leaving site.	Stormwater detention basin will be included in draft EPA Pollution Reduction Program (PRP) 'Stormwater Management Investigation Report'.	Environment / Technical Manager	July 2014	Commenced.
Continue to liaise with the Department of Primary Industries (DPI) Office of Water on the revegetation of the riparian zones on site.	The auditor acknowledges the work that has already been done in this regard, and suggests that continued liaison with the Department is required to ensure that the program for continued revegetation is carried out to their satisfaction.	Shoalhaven Starches to meet with DPI Office of Water to discuss vegetation management plan for the riparian zones on site.	QA/Environmental Coordinator	March 2014	Complete.
Revise the relevant section of the Shoalhaven Starches management systems to ensure that training requirements are correctly documented and records of	Whilst environmental management across the site was considered to be of a good standard, a lack of records meant that Shoalhaven Starches are currently unable to demonstrate that staff have been trained in the environmental management requirements that relate to their duties. For example, Condition 33 (Schedule 2) requires that	Condition 33 compliance condition will be included in annual site induction training for transport providers and records retained.	QA/Environmental Coordinator	March 2014	Complete.

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completion of training are kept for training carried out to meet compliance requirements	heavy vehicles only use specific routes when travelling to and from the site between 8pm and 7am. Whilst there is no evidence of non-compliance with this requirement, suggesting that the training has taken place, training records showing that drivers have been instructed of this requirement were not available. Maintenance of records, particularly training records, will reduce the risk of a future non-compliance and any potential consequences.	N.B Shoalhaven Starches requests the Director-General review the wording of this condition as Shoalhaven Starches cannot 'ensure' that heavy vehicles will utilise this transport route.			