Shoalhaven Starches Development Consent 06_0228 Independent Odour Audit 2026 - Response to Audit Recommendations

Table 1 – AUDIT NON-COMPLIANCES

Cond. No.	Condition and Requirement	Audit Report Non-compliances	Shoalhaven Starches (SS) Response	Timeframe	Status
N/A	No non-compliances received during audit period				

Table 2 – AUDIT RECOMMENDATIONS

Audit Reference	Audit Report Recommendations	Shoalhaven Starches (SS) Response	Timeframe	Status
25/26-REC-A	Section 3.5: Based upon the data presented in Table 6, the biofilters (BF A, B, C) are not achieving the de facto 500 OU standard. It is recommended that the biofilters are operated to achieve a lower odour outlet concentration, although it is noted that BCA #27 demonstrates improved odour destruction efficiency compared to BCA #26.	Investigation of Biofilter performance and gas speciation undertaken by The Odour Unit in May 2025 & May 2026. Primary recommendation is for increased fresh air addition which is currently being designed into the process. Capex to be finalised and approved; once approved, equipment to be installed as soon as possible.	March 2027	In Progress New fan being designed
25/26-REC-B	With regard to flow measurements at EPA ID 8 the odour monitoring reports state: “Sampling was undertaken at the exit of the stack as it was the only accessible area for the samples to be taken. No temperature or flow rate readings could be taken due to access issues.” Shoalhaven Starches have advised that access is limited due to the addition of a silencer on this discharge point for noise control purposes. It is recommended that the access restrictions to EPA ID 8 are resolved to enable compliant odour monitoring to be performed.	The exit for this stack was recently fitted with a replacement silencer to reduce noise coming from this source, as a result the existing sampling point can no longer provide sufficient access for flow rate readings. Investigation into the relocation of this sampling point was undertaken and no other suitable location was found that would comply, not compromise the silencer and be safe to access. Historical flowrates and fan design specs could be considered a reasonable indicator of flow rate from discharge point.	December 2025	**Complete**