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**TRANSCRIPT OF PROCEEDINGS**

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**TRANSCRIPT IN CONFIDENCE**

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O/N H-1259234

**INDEPENDENT PLANNING COMMISSION**

**MEETING WITH DEPARTMENT**

**RE: SHOALHAVEN STARCHES MOD 18**

**PROJECT #: 12344-04**

**PANEL: ANDREW HUTTON (CHAIR)**

**OFFICE OF IPC: LINDSEY BLECHER  
CASEY JOSHUA**

**DEPARTMENT: CHRIS RITCHIE  
DORIS YAU  
SHAUN WILLIAMS**

**LOCATION: VIDEOCONFERENCE**

**DATE: 9.33 AM, THURSDAY, 20 AUGUST 2020**

## THIS PROCEEDING WAS CONDUCTED BY VIDEO CONFERENCE

MR A. HUTTON: Okay. Now, good morning and welcome everyone. Before I  
5 begin I would just like to acknowledge the traditional owners of the land on which  
we meet today and I would like to also pay my respects to the Elders past, present  
and emerging. Welcome to the meeting today to discuss the application for the  
Shoalwater Starches Modification number 18 regarding the production of hand  
sanitiser and hand sanitiser grade ethanol. My name is Andrew Hutton and I'm the  
10 commissioner appointed to this application. Joining me on the call from the Office  
of the Commission today is Casey Joshua and Lindsey Blecher.

In the interests of openness and transparency and to ensure the full capture of today's  
information, the meeting is being recorded. A complete transcript will be produced  
15 and made available on the Commission's website. This meeting is one part of the  
Commissioner's decision making process and it's taking place at a preliminary stage  
of this process that will form several sources of information upon which the  
commission will base its decision. It is important for the commissioner – or  
commissioners announced and myself in this case to ask questions of the attendees  
20 and to clarify issues where we see that as being appropriate.

If you are asked a question and you're not in a position to answer it, please feel free  
to take up a question on notice and you can file the information in writing at a later  
date which we will also put up on our website. To ensure the accuracy of the  
25 transcript I request that all members today introduce themselves before speaking  
every time they wish to speak and for all members to ensure that they're not speaking  
over the top of each other. So I think we will begin. What we might do is just  
quickly do a – just a quick run around the room to make sure that we're all audible to  
Auscript just by, I guess, introducing yourself and your role. That will give us an  
30 intro. So I might start with you in my top left, Lindsey, and then run around the  
room, I guess, please.

MR L. BLECHER: Sure. Thanks, Andrew. Good morning everyone. My name is  
Lindsey Blecher, senior planning officer with the Independent Planning Commission.  
35

MR HUTTON: All right, Casey.

MS C. JOSHUA: I'm Casey Joshua. I'm the principal case manager with the  
Independent Planning Commission.  
40

MR HUTTON: Chris.

MR C. RITCHIE: Yes, Chris Ritchie, director of industry assessments from the  
Department of Planning, Industry and Environment.  
45

MR HUTTON: Then we have Doris.

MS D. YAU: Doris Yau from Department of Planning, team leader, hazard and risk.

MR HUTTON: Thank you. And last, but not least, Shaun.

5

MR S. WILLIAMS: Shaun Williams, acting senior environmental assessment officer for the Department of Planning.

MR HUTTON: Excellent. I can hear that clearly. If everyone else can, I think we're okay. Great. All right, thanks again for coming along today and apologies, I guess, that we're – well, not apology but we're still working on this online platform and we're making do, so I do thank you very much for, I guess, your patience with this. It does seem to work reasonably well and I thank you for coming in, often at home ..... this one. What I was hoping to do was look – just have a quick chat through the, I guess, some of the key questions that have come out of the review of the assessment report which, I have to say, is a good report and does give a good overview of the development.

So, I guess, initially I was just going to see whether you had any general comments or a bit of a summary you wanted to make in relation to it. Perhaps you, Chris, or the team, and then we might ask a couple of questions and certainly I've got a couple I wouldn't mind asking once you've been through that summary. So if that's appropriate, I might just hand over to you, mate, just to give us a quick run through.

MR RITCHIE: Yes. Yes, so Chris Ritchie here. Firstly, we want to thank the Commission for giving us the opportunity to brief you on this application. And I – I agree that I think what we will do is give you a quick overview of the projects, particularly, like myself, I've dealt with the site for probably 10 years.

MR HUTTON: Yes.

MR RITCHIE: And, sort of, can run through the evolution of the projects including essentially what they do, the scale of, I suppose, the operation, answering some of those questions hopefully in the little presentation that we will give and then the residual questions that we have at the end. More than happy to answer that.

MR HUTTON: Right. Thank you.

MR RITCHIE: So I know for the purposes of briefing you, we just had a couple of slides that we can, sort of, show on a screen that we can talk to you as we go.

MR HUTTON: Yes.

MR RITCHIE: And I meant to send them to you this morning, Casey, but I was busily preparing kids for school and myself and this presentation. So maybe, Shaun, if you can show that somehow, or - - -

MR WILLIAMS: Yes, I can share my screen if – sorry – this is Shaun speaking. I can – I can share my screen if I have access. At the moment it says “host disabled participant screensharing”.

5 MR RITCHIE: Maybe send that to Casey then.

MR HUTTON: Yes, email it all now, Shaun, just to ping it across to Casey.

MR WILLIAMS: Yes, I can send that now.

10

MR HUTTON: Right.

MS JOSHUA: I’ve just changed the settings, so you can share as well, but happy for you to email it to me if you like.

15

MR WILLIAMS: Okay.

MR HUTTON: Testing our technical skills now.

20 MR RITCHIE: Yes, that’s why I’m not doing it. So while we pull that up, you would have appreciated from the report that there has been a level of operation at the Bomaderry sites since – I think about 1979 they would have started. At that time they were making starch, gluten, glucose products from wheat and sorghum and a lot of that was from materials imported from western New South Wales.

25

MR HUTTON: Yes.

MR RITCHIE: Since about ’92 they started with ethanol production and during the course of, I suppose, the late 1990s towards the early 2000s there – there were a number of odour issues emanating from the site. And as a means of addressing that odour issue there was an application which we dealt with as part 3(a) back in the day in about 2009 to, essentially, increase ethanol production primarily for fuel, but at the same time they were seeking to address a number of those odour issues that had emanated from the site. So the image now is on the screen. Hopefully, we can see that now.

35

MR HUTTON: Excellent.

MR RITCHIE: So in terms of orientating itself, the site – there’s two – there’s two key aspects to the site and you can see from the bottom figure the actual factory element which is where the production of material happens where the, you know, the manufacturing occurs, where the material is imported and where products are made and distributed. And you can see Shaun is just pointing there at the moment. But the town itself of Bomaderry is really closest residential area just to the north-west with the closest resident about 500 metres to the west, so roughly about there where Shaun is pointing to. Importantly though, what the – what the operation includes is about 1000 hectares of what they call the environmental farm.

45

Now, that runs – you can see the – to the north you’ve got a couple of pivots you can see, so that’s roughly 1000 hectares and that’s where a lot of the waste water is irrigated following treatment. You can see the treatment plant just to the centre of that image there.

5

MR HUTTON: Yes.

MR RITCHIE: The river – the Shoalhaven River bounds the southern part of the site. And the factory itself, it has actually grown over time. So originally when we dealt with it in 2009 it was roughly twelve and a half hectares, but over time they’ve acquired extra land to the east including a former – I think it was a former paper mill and I can’t remember the other one. And so the site itself at the factory element is probably 40 hectares in size. So the reason why I probably want to point that out is probably some of the questioning around the – the – you know, being a modification and being a section 96(1) or a 4.551(a). Importantly, when I give a bit of response to that, just – we need to just have in our mind the actual size of the site itself.

15

MR HUTTON: Yes.

MR RITCHIE: So if we run to the next slide, Shaun – so there we’re just zooming in a bit closer. And you can see with that image there that often a lot of the issues that we deal with in terms of modifications or proposals on the site itself also relate to the proximity to the river itself. So in terms of riverbank stability that’s a constant issue that we look at in terms of modifications on the site and, also, flood liability. So running to the next one. So as I started off, the site itself operated from about 1979. It was at that time twelve and a half hectares, but with a large environmental area to the north.

25

At the moment, through that 2009 expansion the amount of ethanol made on site went from 126 to 300 megalitres, but given that there were historic odour issues, there were significant odour improvements that were required before they could increase production. So over the course of – or since that approval they’ve – I think there was a staged step-up from 126 to 200, and from 200 to 250, and 250 to 300, along those lines.

35

MR HUTTON: .....

MR RITCHIE: So, essentially, they had satisfied those requirements over a period of time and essentially - - -

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MR HUTTON: Chris, that has been – those – that the requirements of the condition 7 in current ..... that has been met and been met and therefore they are entitled to .....

MR RITCHIE: Yes, correct. Correct. Although, given the demands in ethanol input into fuel have not reached the amounts that they originally thought would occur, at the moment they’re actually at about 237 from memory. I think in about 2017 they were about 237 megalitres, so while they’re allowed to go to 300 – and we

45

can provide the Commission with information that would show that we had signed that off – at the moment their production is not at 300 at the moment.

5 MR HUTTON: Yes. That would be useful because that was a key question - - -

MR RITCHIE: Yes.

10 MR HUTTON: - - - just about making sure that they had stepped through those milestones and .....

MR RITCHIE: Yes. And, you know, as I was saying, I was involved in that so I remember it quite dearly and there was a lot of – we had Kerry Holmes at the time who was our independent odour expert, so each time there was a request it had to be supported by an independent odour report which Kerry had worked on. And there  
15 was about two or three steps, from memory, to get to 300 at which we had signed that off. But we can provide that to the Commission.

MR HUTTON: That's wonderful. And then that's – that leads to the production tale which I'm comfortable with now ..... information.

20 MR RITCHIE: Yes, okay. So moving on, so the site itself, it not only makes ethanol but there's a number of things that occur on site. There's flour production, there's gluten production, there's starch production and a lot of those materials are used for a variety of things from food to paper to brewing to fuel. And one of the  
25 things that Shoalhaven Starches have had to do since they were approved in two thousand – or since the expansion was approved in 2009 is to – is to continually look at opportunities to optimise what they do on site, but, also, to respond to market demands in terms of, say, one of the modifications that we dealt with was making  
30 pelletised food input for cattle feed out of the dry distiller's grain.

But, also, one of the challenges that Starches have had, being such a big factory, is energy costs, so there's been a few changes to deal with that as well. So in terms of what's on that site, and we're talking about prior to this one, obviously, 16  
35 modifications that have been approved and all by the Planning Assessment Commission or the IPC, a variety of things including relocation of car park, a pelletising plant which I was talking about before, additional flour mill production, fermenting, distilling, production of ethanol – beverage grade ethanol. And when you look at the infrastructure to do that, it's quite significant. We're talking about, you know, 30 silos on site that hold liquid products, or 20 odd silos on site that hold  
40 dry products.

At the moment there's already seven boilers on site. One of the aspects of this modification is relocating one of those boilers. There's production dryers. You can  
45 see on that list there, there's a lot of, I suppose, equipment and infrastructure involved in manufacturing and making those various materials. So we run to the next slide. And, sort of, drilling down to the mod itself, Shoalhaven Starches approached us, probably earlier this year – Shaun, from memory – and advised us

that the Federal Government had approached them about providing some assistance in manufacturing or providing a bulk amount of ethanol that can be used for making hand sanitiser.

5 So although that modification did evolve slightly, which we will touch on in a sec, in essence, we didn't think there was a lot really involved in terms of the consent itself to facilitate the actual modification. So we talked about moving an already approved gas fired boiler, some relocation of some gantry, some additional pipe network, but there's a thing called a defatting plant which is already there but just had to be  
10 repurposed to help actually make the hand sanitiser material. And then in terms of new items, there was some additional storage tanks which were two, but in the context of the site, we didn't think that that's a lot.

15 And then there's a storage area, I think, from when the product is made. So in terms of a 40 hectare site with all that infrastructure, we didn't feel that it was a significant change, the proposal, and we were happy to deal with it as a modification being quite a minimal or a minor modification. Given that even though the approved gas boiler is being relocated, it wouldn't essentially be - - -

20 MR HUTTON: Just one second, Chris.

MR RITCHIE: Yes.

25 MR HUTTON: Can – was that breaking up for everybody or just for me? Just me it seems like.

MR BLECHER: It was fine for me. Lindsey here, sorry.

30 MR HUTTON: Okay. Thank you. Sorry, I'm just having to ..... up just a fraction. It looks like my wi-fi has dropped a little bit, but if you can just – sorry – go back just 15 seconds, Chris, and then continue again, I will be able to .....

35 MR RITCHIE: ..... what I say. I think I was trying to say that given that while a lot of the mod deals with relocating or moving already approved infrastructure plus the addition of, say, two ethanol storage tanks on top of the number of tanks that already occur on site - - -

MR HUTTON: Yes.

40 MR RITCHIE: - - - then we didn't believe that it was a significant modification but we were quite comfortable with it being a minor modification. And, I suppose, one of the things just to – and I know with the transitional arrangements it can get a bit confusing, but just to alert and to advise the Commission about provisions within the Environmental Assessment (Savings and Transitional) Regulation of 2017,  
45 essentially, what that says is that when – and this is really when your dealing with, say, part 3(a) is that you're now modifying through part 4, which is what we're doing now, and the test is slightly different.

The test is really down to what was the application up until the last modification under 75(w), so essentially, that would be modification 15, from memory. And in – and then you have to consider the context of the overall site and what occurs on site. So in the context of the thousand hectares of farming, irrigation – in the context of  
5 the 40 hectares of manufacturing and quite – you know, quite intense when you look at the site quite closely – intense industrial activity with lots of tanks and pipes. We’re quite comfortable that it is a 4.551(a) modification to the current facility. And  
- - -

10 MR HUTTON: Yes, we understand – we understand it to be the same.

MR RITCHIE: Yes, okay.

MR HUTTON: Back to Mod 15.

15

MR RITCHIE: Yes.

MR HUTTON: We’re clear on that.

20 MR RITCHIE: So that – just so you know, that’s in – and I had to write it down myself – schedule 2 section 3BA subclause (6) of the Transitional Regulation.

MR HUTTON: Yes.

25 MR RITCHIE: In terms of then turning our mind to the modification, essentially, from an ethanol production point of view the site manufactures fuel grade ethanol, beverage grade ethanol - - -

MR HUTTON: Chris, can I just pose a question there before you move past that?

30

MR RITCHIE: Yes.

MR HUTTON: One of the key tests in the 1(a) is around environmental impact and I just want to ask the department, we’re relocating an approved boiler 650 metres to  
35 the northeast of its current location on the extremity of the site, substantially closer to four noise receptors and yet we’re relying on – the department’s relied on the 2008 noise report to justify the noise. Are you comfortable that there isn’t an impact to those residents because the noise source, albeit a different piece of kit and bit smaller or less frequent, if you like – used less frequently because that’s the justification  
40 around the air quality.

MR RITCHIE: Yes, yes.

MR HUTTON: It’s not causing some – not causing some additional noise impact  
45 for those receptors to the north-east or eastern side of the property, in particular, Pig Island where I understand the 2008 report didn’t consider them as a receptor, but I could stand corrected if I’ve misinterpreted that. Does that question make sense?

MR RITCHIE: Yes. Yes, and I was going to get to that. So - - -

MR HUTTON: Okay.

5 MR RITCHIE: Chris – Chris here from planning. There’s two elements – or three – three parts to that – to that issue. And one is in the 2008 approval the noise assessment would have considered the operation of the entire site.

MR HUTTON: Yes.

10

MR RITCHIE: It would have generated an envelope of impact based on, you know, what was proposed to occur on the site, so a really large expansion. To then – to then make – once you have an envelope like that, to then have a piece of equipment that could technically have a significant effect on, I suppose, a scale or level of that –  
15 of noise that that envelope creates, in essence, when you look at it from a pure, say, maths point of view – and we did talk to our noise expert about this – that piece of equipment has to really generate on its own a significant amount of noise up and above and beyond, really, what the overall site would do itself.

20

So it’s quite a – I suppose, a known, sort of, view that it would have to be 10 dBA on its own above the overall noise generated from that – from that site to make a difference. And it is a question – and it’s a fair question and we do get this question often, “You know, that piece of equipment is it going to do more? It’s moving closer”, but in essence, it itself would have to be a significant generator to then have  
25 an impact on the overall noise coming from there. Notwithstanding that, and to, sort of, allay concerns from the Commission, the site will still need to comply with the same noise criteria that applies.

25

MR HUTTON: Yes.

30

MR RITCHIE: From a licensing point of view, the EPA were quite comfortable that they could rely on that and from a – you know, being the one to licence, particularly emissions of noise and air, were quite comfortable with that approach.

35

MR HUTTON: Yes.

MR RITCHIE: But there are conditions in that consent that will continue to ensure that that does not generate or cause, you know, further air issues. I think there’s the notion of having verifications in there, but also from a noise point of view.

40

MR HUTTON: No, that’s a good explanation and, I mean, noise is – point source, of course, influences but I understand you’ve got a noise – an entire noise profile and what you’re saying is that to change that you would need significantly more noise from that point source, so I acknowledge that.

45

MR RITCHIE: Yes. Yes.

MR HUTTON: Probably an opportunity just to – in that assessment report just to articulate that a little bit clearer, but - - -

MR RITCHIE: Yes.

5

MR HUTTON: But that makes sense to me.

MR RITCHIE: Yes.

10 MR HUTTON: I understand that.

MR RITCHIE: All right. Then, similarly, from an air point of view, while we move into that, the boiler itself is not going to operate at that originally approved capacity of the site, or capacity of which it was originally intended to operate at.

15

MR HUTTON: Yes.

MR RITCHIE: But the EPA did insist, obviously for good reasons, that it must still meet group 6 emissions and wanted to ensure that – because there has been changes on that site. You would have picked up from the report that there's been, you know, coal, gas, back to coal and other stuff.

20

MR HUTTON: Yes.

25 MR RITCHIE: So there's been the need to have a verification to ensure that the emissions from that do meet the standards required by the EPA.

MR HUTTON: Yes.

30 MR RITCHIE: So maybe moving to – to hazards and risks and I can, sort of, ask - - -

MR HUTTON: The last question, sorry, Chris, it will be quick.

35 MR RITCHIE: Yes.

MR HUTTON: Just in relation to the footprint and understanding the – just for clarity for me. So the Mod 15 included the – what was it called – the evaporators and the substation and then there's a container – an approved container storage and the proposed location for the new gas fired boiler is, again, you know, to the – to the eastern extent of that. Are the department satisfied that – is the department satisfied that that's still in the context of the overall site footprint - - -

40

MR RITCHIE: Yes.

45

MR HUTTON: - - - and to work it under 115.

MR RITCHIE: Yes, so Chris here from planning. I think – Shaun, maybe you could help point it out. The site itself – you probably can't even see my cursor – does run to the back of here, as well.

5 MR HUTTON: Okay.

MR RITCHIE: To the west, Shaun. It does run up – because – if you can see, there's a rail line that runs just below those two arrows.

10 MR HUTTON: Yes.

MR RITCHIE: Maybe that figure would help. Does that figure help, Shaun?

15 MR WILLIAMS: Shaun here. Yes. So that's the proposed location of the gas fired boiler.

MR HUTTON: Yes, that's right. Yes.

20 MR RITCHIE: And the site – so where's the boiler? Boiler – it's just hard to see with the images there, Shaun, for me.

MR HUTTON: So the - - -

25 MR WILLIAMS: The site approximately ends around here.

MR HUTTON: Yes.

30 MR WILLIAMS: And then on towards here is the actual office building for the Starches facility.

MR HUTTON: Okay.

35 MR RITCHIE: You can see below those red arrows is a rail line. So the rail line actually – where the rail line ends, I'm pretty sure their land actually goes up to, probably, the top of the image there where the red – just where that red line there, Shaun.

MR HUTTON: Yes, okay.

40 MR RITCHIE: Yes. And that's why I'm saying over the course of the original operation in '79 that there's been mods in the past to include additional land they've acquired over the last 10 years or so.

45 MR HUTTON: Yes. Yes.

MR RITCHIE: And even - - -

MR HUTTON: That's been most helpful, Chris, and I appreciate you taking the time to go through that with us. So thank you. I do appreciate that.

5 MR RITCHIE: That's all fine. And from a hazards and risks – and I will, sort of, hand to Doris a little bit, but in – obviously just to explain for the benefit of the Commission, the management of hazards and risks and safety related issues from a planning point of view does rest in our team and Doris heads that team up. So in terms of SEPP 33 and the assessment of hazardous projects plus land use safety  
10 planning around risky sites is managed by us under the SEPP, but also a number of different hazard advisory papers which is about 12 technical papers. So we manage that and one of the key sites that we deal with is sites that Shoalhaven Starches given what they produce on site and given the potential risks in terms of not just a fuel, but also handling grains and stuff like that, you can get what they call flash fires.

15 And, Doris, maybe explain from a hazards point of view how would you manage the site and whenever modifications do arise we do ask that the, sort of, management of the site through various post-approval mitigation measures is also augmented to include that modification on each occasion. So maybe explaining that, Doris.

20 MS YAU: Doris here from the department. So this site has been around for long and then have undergone many stages of modifications. So what happened is because it's fallen under section 3 with the ethanol and also there's various complication that's explosion complication over the site from grain and flour  
25 handling, it has been – we have prescribed a whole list of post-approval requirements from hazard risk including a hazard study which is looking into the design phase to ensure every – everything under this design is safe. And a safety management study to continue monitor the – to be updated as modified along the way so that every bit of the modification has been captured in their – in their live document, so to speak, from the safety operation point of view.

30 And then, also, there's a hazard analysis and a final hazard analysis. What happened is a scale of industry like this where the preliminary hazard analysis may not reflect the final design, so we always require them to verify whether their actual design at the final stage is what is the risk level and that and that we – we capture it that way.  
35 For - - -

MR HUTTON: So, Doris, is that captured as a consent condition?

40 MS YAU: Yes, that's right. So – yes, for the – we continuously review their hazard construction safety study and all that and then as part of the post-approval and – so this one – this Mod 18 will be in a similar nature and then we request them to update all the hazard related requirement as modified along the way.

45 MR HUTTON: Yes.

MS YAU: Yes. So in terms of Mod 18 from the hazard and risk side, there's – first of all, the ethanol it's probably is the major flammable hazard, so to speak. But then

they are produced under the current – like, even including the hand sanitiser grade of ethanol, it's still under the current consent limit of 300 megalitre.

MR HUTTON: Yes.

5

MS YAU: So – and their site has been producing ethanol all along, so they know the process and they know what to do with it. In terms of the process itself, basically, it's the existing ethanol process plant and they have a T-off to have the hand sanitiser grade ethanol and to pipe it into ethanol storage tank. So they have a  
10 dedicated tank just for the hand sanitiser for the ethanol storage.

MR HUTTON: Yes.

MS YAU: Then the hand sanitiser mixing and production of the hand sanitiser,  
15 basically, is in a small scale and produces the amount. So two of the key ingredient besides the ethanol is the hydrogen peroxide and the glycerine.

MR HUTTON: Yes.

MS YAU: And then hydrogen peroxide itself could be a oxidising agent which is  
20 promoting combustion, so to speak, if it's leaked. However, because the site it's producing as demand, so they actually store as required only and then only in a small package, like a IBC tank, a thousand litre container. And they are fairly robust and then – and then – and not just because of their small container size, when they are  
25 producing it they have additional safeguard in place. For example, because ethanol when you're mixing it, it could create flammable vapour, so they ensure that there's a nitrogen padding. That's described in the ..... process.

They basically try to avoid the potential mix with the ethanol and the oxygen in – to  
30 have the nitrogen blanket on top of it so that it should prevent the air mixture become flammable. So that's – this is one of the major safeguards for them to make sure that when the actual mixing occur it doesn't – it doesn't become flammable vapour everywhere. And then – then the spillage, basically, the site has been operating – like, handling this kind of substance long enough. They have very robust build  
35 container system.

MR HUTTON: Yes.

MS YAU: So if – first of all, the IBC they are only having one IBC at a time and if  
40 it's filled it will have a bung on this all to capture overspill. And even if it's – like, it's very unlikely that they will have significant spill that go off the bung, but even if it's so, it is understood that – because through all the mod they have been improving their spillage containment, they have – they will contain all the spill into a separate sump and so that nothing can be leaked off the side boundary. So these are some of  
45 the important safeguard and then to – to make the hand sanitiser operation quite safely, so we don't consider it's a major risk from assembly side.

MR HUTTON: During the – during the application there was a change from an outdoor covered storage area to bring the operation bring back into the defatting plant and in doing so reduced the risks – the hazard risks, I think predominantly around fire, can you just explain how that risk from moving from an outdoor  
5 arrangement to an indoor arrangement how that was made a lower risk? What’s the mechanism there that drives that? Is it a consequence thing or is it a safer way of – I know the EPA had some initial concerns and they were satisfied that when they moved inside to the defatting plant that that was addressed. I’m just interested in that piece.

10 MS YAU: Yes, so the original proposal when it was – I think that was the original that they haven’t even thinking about to produce a hand sanitiser.

MR HUTTON: Yes.  
15

MS YAU: They producer have the storage in the car park area and then – the car park area probably it’s just not as – not having the bung area and the mixing and the air monitoring and all that – all that safeguard in place and therefore, moving into indoor area with more – more protection it become appropriate.

20 MR HUTTON: Okay. Yes. Okay, thank you. That’s good. I know the department is – was satisfied with the hazard assessment, in any case, but that has been very useful to understand that. Thanks very much, Doris.

25 MS YAU: That’s all right.

MR HUTTON: Sorry – had you – are you finished with everything you were looking to present? Unless .....

30 MR RITCHIE: Well, I think we can, unless we – Shaun, maybe you want to touch on the way the mod had changed, but how – how we’ve addressed the corresponding limits within the consent, because going back to the point the Commission – we’ve been raising about the 300 megalitres and making sure we’re not going over that threshold number.

35 MR HUTTON: Yes.

MR RITCHIE: So maybe – I will throw to Shaun to maybe explain how the mod did slightly change and what they’re now seeking to do and how we’ve controlled  
40 that through the consents, or recommended conditions.

MR HUTTON: Thank you.

MR WILLIAMS: Shaun here. So as was just briefly touched on before there was a  
45 change through the modification application of being what was sort. So originally the modification application was only seeking the production of ethanol – hand sanitiser grade ethanol of about 120 megalitres which was contained within the

overarching approval of 300 megalitres, so there was never going to be any excess of the approved limits of 300 megalitres. Halfway through though, after comments were raised by EPA regarding the outdoor storage area, the applicant then decided that it would actually be worthwhile for them to produce a small amount of hand  
5 sanitiser on site as well by repurposing the defatting plant.

So then via email they were able to confirm to us that the only amount that they were proposing to produce was 1.5 megalitres which in the scheme of the operations is quite minimal compared to the 300 megalitres of ethanol produced on site. So our  
10 means of trying to capture this in the consent is, I think – believe it's condition 6 – 6(1) we aimed at capturing that production of hand sanitiser within there, so to provide a clarity of their production and limits and no confusion between the hand sanitiser and the ethanol produced on site.

15 MR HUTTON: Thank you.

MR RITCHIE: So just adding to that, so if we think about the different ethanol that they make on site, so you've got the beverage grade. You've got what they call high  
20 grade, then you've got the fuel grade. So the hand sanitiser fits in what they call the beverage grade, or the medium grade, and what they'll do, they will have to balance out according to what the market requires. Whether they – if there's a demand for more hand sanitiser that means they'll make less fuel grade ethanol, for example. And that's probably the one that is – has been reducing over a bit of time. But the intent of how we recommended those conditions is they can't go above that 300  
25 which is, obviously, the maximum envelope production that they've sought originally.

MR HUTTON: Yes.

30 MR WILLIAMS: It's Shaun here. I will just touch on it again with what Chris was saying. So I believe originally there was potentially going to be a government mandate about ethanol fuel. However, I don't believe this ended up occurring even though the applicant ended up modifying the site to enable fuel grade ethanol. So it ended up not being a really strategic business venture for them, so that's why they  
35 haven't been producing ethanol to their approved limits just because it hasn't been viable for them to produce the fuel grade ethanol. So in turn, this hand sanitiser grade ethanol would likely consume the portion of approved fuel grade, if that makes sense.

40 MR HUTTON: Yes, it does. Yes. You've covered a lot of my questions in that presentation, thank you.

MR RITCHIE: That's – it's always the aim.

45 MR HUTTON: Yes. No, well done. One but – I do want to ask this very briefly is just around traffic. Do you anticipate that the changes that are proposed will result in any material changes to traffic type, or flow, or – and I only raise it because in past

modifications traffic's been an issue that there has been a submission made on it. And I just wanted to satisfy myself that the department is happy with there being no material change to traffic.

5 MR RITCHIE: Yes. In short, we're satisfied and turning – I suppose, the reason being that the traffic assessments compared to what's been generated on site wouldn't – wouldn't have matched, I suppose, what the maximum output that they would have envisaged in the past.

10 MR HUTTON: Yes.

MR RITCHIE: And from – again, going back to that envelope point of view, we don't believe there's going to be any significant material change from what either currently occurs or what was approved to occur. Going back – and you're right.  
15 There has been questions and issues raised in the past and a lot of that had got to do with the – either additional access points of which, from memory, there's probably four on the – either the southern side or northern side. And there has in the past been a lot of issues raised, particularly by council, in relation to the improvements to line marking and safety that Starches were required to have done back in the past.

20 And there has been different, I suppose, submissions in the past through various applications to remind us of what needs to be, sort of, done in terms of the line marking on site or moving of speed signs and stuff like that. But I know, you know, at least in the last five or more years we know from a – dealing with the site's point  
25 view that those issues have been resolved.

MR HUTTON: Yes. And on my reading of the information the council are happy with this mod. In fact, we offered them the opportunity to attend a meeting to talk to us and they were satisfied that they didn't need to meet, so I think that acknowledges  
30 that point.

MR RITCHIE: Yes. Chris, again, here. I – we – I would say that's correct.

MR HUTTON: Okay.  
35

MR RITCHIE: And not wanting to, you know, feeling the need to raise anything would address that.

MR HUTTON: Yes. Team, that's been most useful. Thank you for the preparation  
40 that you put into that. It's appreciated. I don't have any further questions. We are meeting with the applicant shortly, as well, and there'll be a couple of other, I guess, operational style questions. But you've – you've done a great job of explaining that to us. The applicant had also provided us with a bit of a YouTube clip and a couple  
45 of photos and things to, sort of, help us get our head around the site which has the been most useful and you've supported that information, so thank you. I will just refer to Lindsey and Casey to make sure you guys don't have any unanswered

questions from your side. I think most of our questions have been addressed. Just confirming.

5 MS JOSHUA: No questions from me, thanks.

MR BLECHER: Lindsey Blecher here. No questions from me either. Thank you.

10 MR HUTTON: All right, thanks. Well, on that basis I think I'll thank you again for your attendance and, again, particularly for your preparation in coming to us with that information and I will officially close the meeting. Thank you.

MR RITCHIE: Thank you very much.

15 MR HUTTON: Thanks.

MS YAU: Thank you.

MS JOSHUA: Thank you.

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**MATTER ADJOURNED AT 10.15 AM INDEFINITELY**