

## Incitec Pivot Limited

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15 May 2013

Project No. SSI 10\_0203

Department of Planning and Infrastructure  
23-33 Bridge Street,  
Sydney  
NSW 2000

Attention: Swati Sharma

**Subject: IPL comments on the NPC Capital Strategic Dredging Project EIS  
(SSI 10\_0203)**

This letter acts as a submission to the Department of Planning and Infrastructure (DP&I) from Incitec Pivot Limited (IPL) regarding Newcastle Port Corporation's (NPC) Capital Strategic Dredging Project Environmental Impact Statement (EIS).

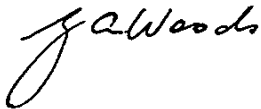
IPL are supportive of the Project and believe that it is justified given the Project's importance to the economy of the region, the state and the country. However IPL would like to see the following points addressed prior to any determination to ensure that any affects of the Project on Walsh Point are understood and would not affect our current and proposed operations.

1. The NPC EIS does not mention Incitec Pivot Ltd.'s (IPL) Proposed Ammonium Nitrate Facility on Kooragang Island (SSD 4986). The EIS for this project went on Exhibition in September 2012, and its contents should been considered cumulatively with the NPC Capital Strategic Dredging Project.
2. Section 8.2.1 states that '*excessive levels of nutrients are primarily due to point sources rather than diffuse catchment run-off sources.*' This is not the case as discussed within Chapter 13 and Appendix H of the IPL EIS for the Proposed Ammonium Nitrate Facility on Kooragang Island (SSD 4986). Studies completed for this project have concluded, in agreement with the EPA, that the major inputs of nutrients are received from upstream catchment runoff.
3. Section 11.4.6 of the noise assessment has not considered the impact of the Project on industrial offices within close proximity to the works. The offices at IPL and other companies are close to Walsh Point and it should be confirmed that the proposed works in this location would not exceed the Interim Construction Noise Guidelines for these industrial facilities.
4. IPL is aware that Kooragang Island is subject to a high level of traffic congestion. Therefore we would recommend that the traffic and transport assessment be revised to
  - a. use the 2010 AADT information from RMS instead of the 2004 figures;

- b. incorporate a annual growth factor on these numbers to a nominal construction year;
  - c. revise the 'volume for haul' calculations to include the additional volume that the cement stabilisation process would add to the contaminant sediments (worst case about 30%<sup>1</sup> giving a revised total of approximately 42,250 cubic meters);
  - d. revise the predicted truck movements to include deliveries of cement to Walsh Point for the treatment process; and
  - e. understand what the predicted changes in Level of Service for relevant midblocks and intersections would be.
5. For the Air Quality assessment only residential receptors have been considered. The EIS states '*Stockpiled sediments have the potential to create local air quality impacts, particularly materials containing PAHs.*' A large number of workers are employed at businesses on Walsh Point. Equally a large number of deliveries arrive at and leave the sites. These workers and drivers are also receptors that should be considered, particularly if PAHs enter the atmosphere and could affect individuals who are driving or working in industrial areas.

Please find attached a political donations disclosure statement.

*Yours sincerely*



Group HSE Risk Manager

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<sup>1</sup> [http://www.cement.org/waste/wt\\_faq.asp](http://www.cement.org/waste/wt_faq.asp)