

Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
Sydney 2001

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October 23, 2012

This is a submission **OBJECTING** to the proposed Incitec Ammonium Nitrate manufacturing facility on Kooragang Island (SSD-4986) in Newcastle.

My wife and I relocated to Stockton from Sydney in 2011. We purchased a house in Fullerton Street and have just celebrated 12 months of living in Stockton.

We were attracted to Stockton because of its unique location between the harbor and the sea, and the character filled village with a friendly and small community.

We were concerned about the ongoing breaches at the Orica Plant on Kooragang Island prior to our purchase, but were reassured by the ongoing consultation between Orica, the EPA and local residents to address issues of concern.

WE WOULD NOT HAVE PURCHASED OUR PROPERTY IF WE HAD KNOWLEDGE OF THE PROPOSED INCITEC FACILITY.

This is because we have grave concerns about the **accumulative risks and hazards** of two ammonium nitrate plants side by side on Kooragang Island, and in close proximity to other industrial plants and activities.

The accumulative risks and hazards form the basis of my objection to the proposed facility and are outlined below:

Explosion Risks

If the Incitec facility proceeds, it will have capacity to store significant amounts of ammonium nitrate of up to 12,500 tonnes. Orica (in their plant next door to the proposed Incitec plant) currently have capacity to store 9,000 tonnes. Nowhere else in the world is such a huge quantity of ammonium nitrate stored within 800 metres of a residential community.

The consequences of an explosion involving this amount of ammonium nitrate are horrific.

Whilst the chance of an explosion may be small, ammonium nitrate is highly combustible under a range of conditions including fire, shock and contact with contaminants. Unfortunately there have been a number of significant 'accidental' explosions in other parts of the world resulting in death, injury and destruction on a large scale.

I therefore believe that it is unsafe and unacceptable to store such a large amount of ammonium nitrate within 800 metres of a residential community. It is totally unacceptable to expose residents to a risk that has potential for damage to life and property. To that end I note that SafeWork SA's report into Incitec Pivot's Ammonium Nitrate plant at Port Adelaide concluded that it posed an unacceptable risk to local residents due to the possibility of "mass explosion" and that a fire at the plant would "produce a large volume of toxic gas" and force evacuation of people even if an explosion were averted. The Port Adelaide facility is substantially smaller than the proposed facility on Kooragang Island. The SA government is working with Incitec Pivot to relocate to a more appropriate site. The NSW government should take note of this precedent.

Incitec have not provided adequate information on the explosive risk and radius of risk to local residents in the event of an explosion in their Environmental Impact Study (EIS), and no emergency/evacuation plan has been provided.

I find this concerning and unacceptable.

Noise Pollution

I currently experience high noise levels from industry on Kooragang Island, particularly at night when the noise levels exceed the EPA 45dB standard for residential suburbs.

The proposed Incitec facility would further increase noise which is unacceptable when the levels are already above the recommended level.

I was appalled to read in the press (Newcastle Herald 19/9/2012 pages 1+4) that Incitec (in their EIS) have called for an increase in the allowable noise levels in relation to their proposed facility.

They justify this by arguing a suburban/industrial interface exists in relation to Stockton and 'as the industrial level of industrial noise exceeds the noise amenity criteria recommended by the EPA's Industrial Noise Policy by a significant margin, alternate operational noise criteria has been nominated for the project'(quote from the Newcastle Herald 19/9/2012, page 4).

I am shocked by this attitude and response from Incitec, and find their EIS request for increased noise levels insulting and totally unacceptable.

Air Pollution

The Incitec plant will also add to cumulative impacts on air quality in surrounding suburbs by releasing fine particles of ammonium nitrate from the Prill tower and nitrous oxides from the nitric acid plant. Both these pollutants can affect the health of residents and Stockton residents have already had recordings of PM10 particles in excess of the standard 50 ug/m3.

I also experience high levels of coal dust (as evidenced by the need to clean our cars and outdoor furniture regularly), and experience unpleasant smells associated with existing industry. The Incitec facility will add to our existing air pollution and have potential to further compromise the health and well being of local residents. This is not acceptable.

Traffic Congestion:

The Incitec proposal estimates that there will be an additional 37 large truck movements per day from the Incitec site to Industrial Drive. This would escalate the traffic on this already busy Kooragang Is corridor and provide substantive and increased risk of explosion in the unfortunate circumstance of an accident along that corridor involving a vehicle transporting ammonium nitrate.

House Prices

As I mentioned in my opening paragraph, my wife and I would not have purchased our property in Stockton 12 months ago if we had known about the Incitec proposal.

We do not want to live alongside another ammonium nitrate plant with the associated risks and impact on pollution and quality of life. We already experience significant impacts from industries nearby and on Kooragang Island.

Potential buyers to Stockton may well share the same concerns and hesitate to purchase if the Incitec facility proceeds, and housing prices will fall.

In conclusion, I believe that the Environmental Impact Statement (EIS) provided by Incitec Pivot fails to address the accumulative impacts of the proposed Ammonium Nitrate Manufacturing Facility with existing industry.

There are risks and hazards to the residents of Stockton and nearby suburbs of Newcastle associated with the proposed facility.

These are compounded by the existing industries and activity in the area and must be considered in this context. The accumulative risk is significant and that is why I strongly object to the proposal (SSD-4986).

As submission makers are required to disclose political donations totaling \$1000 or more in the past 2 years, I can state that **I have not made a disclosable donation.**

Yours Sincerely,

A handwritten signature in black ink that reads "Ian Shorland". The signature is written in a cursive, flowing style.

Ian Shorland