

12 October 2012

Attention: Nicholas Hall
Major Projects Assessment
Mining and Industry
Department Planning & Infrastructure
Room 305
23-33 Bridge Street
SYDNEY NSW 2001

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Dear Mr Hall

**INCITEC PIVOT AMMONIUM NITRATE MANUFACTURING FACILITY
39 HERON ROAD, KOORAGANG ISLAND, NEWCASTLE**

Thank you for the opportunity to comment on the Incitec Pivot Ammonium Nitrate Manufacturing Facility proposed by Incitec Pivot on Kooragang Island, Newcastle. The documents relating to the proposal have been reviewed by Health Protection, Hunter New England Population Health.

In relation to health protection concerns, consideration must be given to protecting the health of the community from potential environmental health hazards which may result from this new development.

A review of the recent Environmental Impact Statement (EIS) was carried out and assuming the impacts relating to air quality, noise and vibration, and surface and groundwater are within those levels indicated in the EIS, and all Management and Monitoring Plans are complied with, Hunter New England Population Health has no objections to these aspects of the proposal.

In relation to other health protection concerns the following recommendations also need to be considered:

- Existing and future local industry in the vicinity of the proposed development must be considered in regard to the impact of odour, noise, vibration, and dust or air particulate emissions. Sufficient buffer zones must be implemented to ensure that the health of the population is

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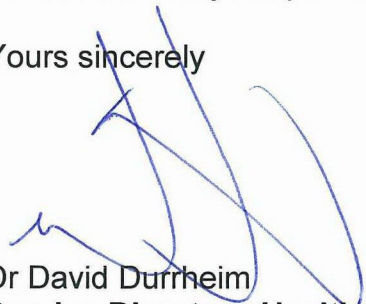
protected and to minimise complaints. A cumulative impacts approach should be adopted.

- Water cooling systems and/or warm water systems must meet the *Australian Standard 3666* and the *NSW Code of Practice for the Control of Legionnaires Disease 2004, 2nd edition*. Regulated systems must be registered with the Local Council and installed and maintained to prevent the growth of *Legionella*.
- The Emergency Management Plan for the site should incorporate procedures that outline a strategic Early Warning System (EWS) for any incident/emergency emanating from the development that may affect adjoining properties and the local population.
- The Emergency Management Plan should take an All Hazards approach and carefully analyse and model the impact of all possible hazards on the site including sabotage and natural disasters. Details of risk reduction, mitigation and management approaches should be defined.

The social impact of this development is important. The proponent needs to demonstrate a process of consultation and engagement with community and stakeholder groups in an effort to obtain a level of understanding and acceptance of this proposal. It is crucial that Department of Planning also define clearly the requirements for effective community consultation.

If you require further information, please contact Mr Chris Williams, Environmental Health Officer by telephoning 4924 6481 or 0409 153 175.

Yours sincerely



Dr David Durrheim
Service Director - Health Protection
Hunter New England Population Health