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Dept. of Planning and Infrastructure
GPO Box 39
SYDNEY 2001
Attention: Andrew Hartcher – Planner

Reference: SSD-5119.

Objection for Crawfords Freightlines Ammonium Nitrate Storage Facility

I strongly object to Crawfords Freightlines application for Ammonium Nitrate Storage facility at 158 Maitland Rd Sandgate 2304, a suburb of Newcastle.

I support my objection about this proposed project with the following key points.

- 1. The dangers to traffic and the wider community due to the movement by road transport.**

This facility is simply a depot and as such every tonne of material carted into the site has to be carted out of the site.

Almost every loaded vehicle also has an unloaded vehicle.

This greatly escalates the vehicle numbers and massively raises the risks for other road users and for those residence and businesses along route roadways. The information provided in the application does not seem to reasonably explain the dangers and risks. It offers little information as to how this hazardous risk will be minimised whilst being transported.

It must be noted that the trucks in use include the maximum permitted vehicle size. B doubles and Road Trains are currently in use on the Industrial Highway and other roads frequented by Crawfords (and their associates). B triples would seem to be a likely progression in the near future.

If approved the conditions of consent need to include maximum vehicle

specifications and fully documented safety procedures.
The use of rail from the Port to close to the final destination is the only sound option for the products handling and distribution.

2. The inadequate storage and Handling of Ammonium Nitrate

Ammonium Nitrate is an oxidising agent that is very corrosive and harmful to health.

Ammonium Nitrate when mixed with other common products including water and or diesel becomes even more potent. The massive Texas City explosion was triggered because Ammonium Nitrate got wet with a very small volume of water.

Ammonium Nitrate when mixed with diesel becomes a very significant explosive. It is the explosive characteristic that is the end product of the material handled by this proposed depot.

The cartage of AN and fuel in close proximity to each other is of very serious concern.

It would also seem that the applicant fails to address the requirements of AS4326 adequately.

3. Potential for major pollution of waterways and residential areas.

Ammonium Nitrate can be present in many states. Liquid, gas and solid. The product can change state readily either by itself or by design.

If Ammonium Nitrate is spilt from a truck or escapes from the storage depot the consequences could be very severe particularly if the material washes into a watercourse.

Damage to a watercourse would be extremely difficult to rectify.

This potential hazard is exacerbated by its proximity to the Hunter River, the Hexham Wetlands and other low lying areas.

The consequences of a spillage or leakage are simple not worth the risk in using this inappropriate site.

This project certainly should not be considered as a State Significant Project given the project is without doubt a potential State significant disaster.

The use of rail from the Port to close to the final destination is the only sound option for the products handling and distribution.

4. Risks to residents and the nearby community

There could hardly be a worse site in the Lower Hunter for this proposed activity.

In addition to the risks and issues raised in the three points above this site is little more than a very makeshift storage area that utilises containers as walls and temporary plastic sheeting as roofing. The site sheds are not purpose built.

Given the nature of the product and the volume involved I would have

thought it would have been prudent to locate a green field site in a suitable industrial precinct to build a world class purpose built facility that was based on rail wagon input.

The proposed site seems to have little regard for residents, hospital patients, university students, the Great Northern Rail line or those using one of the Hunter valley's major roadways.

The inability to reliably secure the locality due to its open plan, closeness to road and rail and isolation makes the site a well known target for thieves, vandals and potential terrorists.

In the event of an explosion the primary blast impact radius could be three to five kilometres and the secondary impact radius ten or more kilometres. Clearly the potential for a major "natural disaster equivalent event".

If Crawfords are permitted to establish their facility then a consent condition should require the uptake of an insurance cover sufficient to compensate the community from their hazardous activity.

5. The dangers to the health and safety

The site has major health and safety issues.

The site is landlocked with only one entry and exit on to a very congested roadway. In the event of a mishap evacuations of the locality and the mobility of response vehicles would be severely hampered.

The health and safety of the residents and community in a large area is at considerable risk due not only to the consequences of a mishap but also to things like the mental stress of living in fear of an event.

In conclusion

- I believe the potential for danger and risk to the community far outweighs any potential benefit to the community that this Ammonium Nitrate storage depot would have.
- I believe Crawfords' will find the insurance to cover the risk to the community for damage to life, the environment and property in practical terms uninsurable.
- This is an application for a project that is simply not necessary. This is a rail transport activity that should move the product from the Port area to close to the end use.

Finally I urge that the proposal be rejected and further that Crawfords Freightliners be required to desist from storing ANY ammonium nitrate on the site other than that is on loaded trucks whilst in their depot.

Rick Banyard