



Health

**Illawarra Shoalhaven
Local Health District
Public Health Unit**

NSW Planning & Environment
GPO Box 39
SYDNEY, NSW 2001

Dear Sir/ Madam,

**Proposed Port Kembla Bulk Liquids Terminal
Application SSD 15_7264**

I refer to the EIS Exhibition of the proposed Port Kembla Bulk Liquids Terminal – application number SSD 15_7264. The Illawarra Shoalhaven Public Health Unit (ISLHD PHU) has reviewed the EIS with emphasis on the technical adequacy of the Human Health Risk Assessment, the Air Quality Assessment and the Noise and Vibration Impact Assessment. I would like to take this opportunity to present the following submission for your consideration.

Human Health Risk Assessment (HHRA)

The HHRA prepared by Enrisks (Ref PJ-PK-0001-REPT-012- Revision C) states that there are no identified acute or chronic impacts on the health of the local community from the project. ISLHD PHU is satisfied that for this project the HHRA has used an appropriate approach for the assessment of impacts on human health.

However the HHRA relies on the modelling used in the Air Quality Assessment being valid.

Air Quality

The ISLHD PHU notes that the NSW EPA Air Branch are the most appropriate agency to provide detailed comment potential emissions modelled from the facility, however the following matters have been identified by the ISLHD PHU that should be addressed:

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- Justification is needed as to why representations of each fuel type in the TANKS software were used despite the NPI providing additional databases for the Australian context. Furthermore the NPI Fuel and Organic Liquid Storage – TANKS User Manual indicates that individual chemical characteristics can also be entered into the database if necessary.
- It appears that all fuel was represented by one speciation profile from the US EPA Speciate database. It is not clear if the different composition of a range of fuels were used across the site to model total emissions. The NPI TANKS database contains partial speciation data for a range of fuels that may be useful.
- The HHRA will need to be reviewed and updated if changes are made to the Air Quality Assessment.

Noise and Vibration Impact Assessment

The Noise and Vibration Assessment prepared by Pacific Environment Limited has found that noise generated by the construction and operation of the facility will not be expected to exceed project specific noise goals or acceptable amenity criteria.

ISLHD PHU is satisfied that the Noise and Vibration assessment has appropriately characterised the existing background noise levels and taken a conservative approach to estimating the noise that will be generated by the project.

However as it is proposed to undertake night construction activities and operate 24 hours a day, ISLHD PHU recommends that all reasonable and practicable measures are taken to minimise night time noise that may cause sleep disturbance and subsequent potential health impacts. Incorporation of the identified noise mitigation strategies into the construction and operation environmental management plans will be critical to achieving this outcome.

General Hazards

The effective management of hazards at the proposed facility is essential for the protection of public and environmental health. The potential impact of environmental and operational hazards has been assessed by a Surface Water Assessment and Preliminary Hazard Analysis (PHA), including an assessment against the recommendations of the Buncefield Incident.

The ISLHD PHU has reviewed these documents and can make the following comments:

- The assessment of environmental hazards summarised in table 3.2 of the PHA doesn't appropriately address the risks presented by Tsunami or Storm Surge. The risk of storm surge has been addressed in the Surface Water assessment but there is no assessment of the potential impact of a tsunami on the facility.
- The majority of the response to the Buncefield Recommendations is to be addressed at the detailed design stage and incorporated into the MHF Safety Case Report. ISLHD PHU recommends the development of the facility be subject to compliance with the project requirements identified in Table G.1 of the PHA.

Thankyou for consider the Illawarra Shoalhaven comments on the Port Kembla Bulk Liquids terminal project EIS. Should you wish to discuss our submission further please contact Glendon Lee – Acting Senior Environmental Health Officer on 4221 6700.

Regards



Curtis Gregory

Director - Public Health Unit

29th January 2016

