

1 January 2012

Mr Nick Hall
Senior Planner
Major Projects Assessment
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr Hall

MARSTEL BULK LIQUID FUEL STORAGE FACILITY

I refer to the Environmental Assessment for Marstel Bulk Liquid Fuel Storage Facility application number 08_0130 proposed to be located at the former BHP Steelworks site, Mayfield East, Newcastle.

The environmental assessment has identified and addressed major foreseeable potential public health risks in the various risk assessments and safeguards. There are however some areas that require further clarification and consideration prior to the commencement of works.

The proposal mentions that the company anticipates and plans to double the processing and transporting capacity within 12 months from 300ML to 600ML per year. All aspects of the physical facility as well as the environmental assessment must consider and plan for this impact particularly in relation to product containment (slops, separator and tank holding capacities), cumulative noise, waste management, hazards and risks on site.

Several safeguards are documented for the liquid transfer pipeline. However, they should also include an inspection and maintenance schedule to maintain pipe integrity.

Various safeguards are documented for spill containment to be deployed as necessary around the ship and wharf. Spill containment equipment and spill kits must be in close proximity and easily accessible to allow immediate response and prevent contamination of the river. This is particularly important as the hose pressure connecting the flexible hoses in the transfer manifold system is five times the shipping pressure.

It is unclear whether there will be blending with other distillates on site or the type of products in the additive tank. The hazard and risk assessment should include any required safeguards.

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It is noted that waste water will be managed by an onsite septic tank system. If possible preference would be for waste to be connected to Hunter Water Corporations sewerage system and this possibility should be discussed with Hunter Water.

It is unclear whether the existing gantry underneath the proposed transfer pipeline is of adequate volume to accommodate and contain a leak or spill (this existing gantry also services Kopper's pipeline). In the event of a leak or emergency, will the gantry be able to contain products in the Kopper's pipeline as well as products from Marstel?

Potential risks and safeguards for products in the Kopper's pipeline that may react with diesel and or biofuel should be included in the risk management.

Will the facility have wash down areas for tankers in the event of an overspill? This would prevent product spillage on roads outside the facility, and prevent dangerous and slippery driving conditions.

The proposal mentions cleaning of the transfer pipes, however there is no indication of the specific products that will be used, how the tanks will be cleaned, the anticipated water volume to be used, and whether the slops and separator tank/s will be large enough to contain and process this volume of water. It is also mentioned that the lines will be pigged to prevent product being stored in the transfer pipes. If water is to be used to pig the line, then the slops and separator tank/s need to be of sufficient volume. There is limited information of volume capacity and length of time to process waste in the separator.

It is noted that part of the Director-General's Requirements include consultation with particular organisations and government authorities. Whilst stakeholder consultation has been undertaken we have significant concern that no comments have been received from key regulatory authorities including the NSW Office of Environment and Heritage, Newcastle Port Corporation, Newcastle City Council and the NSW Department of Primary Industries. It is highly recommended that comments be sought directly from these authorities prior to commencement of the development.

Should you require any additional information, please contact Mrs Kelly Main, Environmental Health Officer on 4924 6602.

Yours sincerely



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