

**From:** [REDACTED]  
**To:** <plan\_comment@planning.nsw.gov.au>  
**Date:** 16/08/2010 8:54 pm  
**Subject:** NCIA factory expansion at Rutherford-09\_0006

#### SUBMISSION BY MAITLAND ANTI-STINK CAMPAIGN ( MASC)- 09\_0006

The Maitland Anti-Stink Campaign ( MASC) is a grass roots organisation working in the Rutherford/Telarah region to improve the quality of life of local residents and of the employees working in the industrial estate by trying to reduce the levels of toxic emissions from the multitude of polluting industries established within very close proximity to large residential areas. These problems have existed for over 10 years and people should not be subjected to worsening environmental conditions by the approval of the expansion of the NCIA tile factory for the reasons given below.

1. Already the vast majority of air emissions complaints received in NSW are from the Rutherford area.
2. There are existing air emission issues of toxins which have caused offensive odour and health impacts on the neighbouring businesses and residential areas. These include respiratory problems, asthma and it seems high levels of cancer occurring in the area.
3. NCIA has consistently demonstrated that it does not operate within the key parameter of assessing air quality impacts and consistently breaches licence conditions relating to this key condition including neglecting to monitor emissions. These breaches include: (a) The actual load of Coarse Particulates (Air) exceeded the prescribed limit  
 (b) The concentration limit for Hydrogen Fluoride at Kiln stack exceeded the licence concentration limit  
 (c) The concentration limit for Nitrogen Oxides at Kiln stack exceeded the licence concentration limit  
 (d) The number of ambient ground level 24-hour PM10 samples collected and analysed was less than required by the licence  
 (e) The number of ambient ground level 24-hour HF samples collected and analysed was less than required by licence  
 (f) The number of ambient ground level weekly HF samples collected and analysed was less than required by licence  
 (g) A full data set of meteorological conditions was not obtained.

There are multiples of the non-compliances listed above despite the constant variations given to the ENVIRONMENT PROTECTION LICENCE. These non-compliances have existed since the plant commenced operation!

4. As such NCIA has demonstrated consistently that it is unable to operate under the air emission parameters which were a key condition of development consent. NCIA is not entitled to apply for additional staged development until they demonstrate they are able to adhere to conditions related to air emissions.

5. The industry is situated adjacent to a large and growing residential area containing many schools, pre-schools and aged-care facilities. It is obvious that the industrial estate should not have been located so close to a residential area but since it has it should not be allowed to adversely affect the living standards of the people and groups mentioned above.

6. It should be also noted that under the MAITLAND CITY L.E.P Part 5 Zone 4a General Industrial states: (a) To ensure that industrial development creates areas which are pleasant to work in and are safe  
 (b) Industrial development is allowed only if it does not adversely affect adjacent residential areas.

We feel that this expansion does not fit with either of the above parameters.

7. Noise also remains a major problem. It appears that even though noise modelling was conducted under ideal conditions, levels of 40 DBA are still expected in current residential areas and will have major impacts on future residential development. These noise levels will surely create "sleep disturbance effects" in the current and proposed residential areas.

8. We feel the emission effects from the NCIA alone are detrimental to residents' health and well-being. Unfortunately in our area many polluting industries exist -the cumulative effect of emissions does not appear to be taken into consideration when licences are varied or approvals are given for expansions. We feel this is a grave error as residents are affected by the total level of emissions NOT the level of individual polluters.

In conclusion we feel the expansion of NCIA is an unacceptable RISK to the residents and workers in the area. We should not be subject to high levels of fine particulates, elevated levels of Hydrogen Fluoride and unacceptable levels of noise pollution. We therefore urge the denial of this application for the NCIA expansion. People in this area live with the fear for the health of their families and loved ones and we feel that no new industry should be established until a full and proper health study is conducted in the area and until proper monitoring (monitoring stations) are also established in the area.

NB. This submission can be placed on the website as submitted by the Maitland Anti-Stink Campaign group. I do not give permission for my name or personal details to be made available.