

Nicholas Hall - Planner
Mining and Industry Projects
Dept. of Planning and Infrastructure
GPO Box 39
SYDNEY 2001

Dear Sir

As a resident of Stockton please accept this submission of objection regarding Incitec Pivot's proposed ammonium nitrate plant on Kooragang Island (SSD4986).

In my opinion the proposal creates an unacceptable risk to nearby residents and Incitec's Environmental Impact Statement does not address my concerns of explosive risk, noise, air and water pollution and community lifestyle.

Newcastle and the suburbs that surround the Port are demanding responsible planning decisions and the mere thought of two ammonium nitrate plants, together with a proposed LNG storage facility adjacent, operating side-by-side just 800 from residents is a planning disaster.

The direct impacts from Incitec's proposal for myself include:

Potential for explosion

Incitec's EIS fails to adequately address my concern around the potential risks of storing 21,500 tons of ammonium nitrate (maximum storage capacity combining Orica and Incitec). The blast contours in Incitec's EIS do not even reach Stockton, yet it's well known an ammonia nitrate explosion involving 300 tons of ammonium nitrate in Toulouse, France, killed 33 and >2500 injured within a 5 km radius in 2001. Other, relevant major incidents include,

- 1947 – Texas City, USA Wax coated AN cargo in 2 ships exploded following major fire ~600 fatalities
- 1947 – Brest, France Wax coated AN cargo in ship exploded following a fire 21 fatalities
- 1972 – Australia Road Transport, semi loaded with Low Density AN on fire, also oil load, too remote for fire fighting, Explosion 3 fatalities.
- 1994 Terra –Port Neal

I am aware that ammonium nitrate is an oxidising agent, not an explosive, however, it can be turned into an explosive both quickly and easily by shock waves, foreign matter, heat and pressure. Whilst the risk of explosion is small, the impact of an explosion would be catastrophic and despite slogans in Incitec's EIS of 'world's best practice' accidents do occur, take for instance Orica's Hexavalent Chromium leak in 2011. **The consequence ranking of multiple fatalities and injuries cannot be devalued in a risk assessment process.**

One of the fundamental responsibilities of any Government is the welfare and protection of people and this proposal undermines the safety of around 50,000 residents within a 5km radius. Government should note that if Incitec proceeds there is enough explosive power on Kooragang Island to match the Hiroshima atomic bomb (Hiroshima used 18,000 tons of TNT which is comparable to the

21,000 tons proposed by Incitec and Orica's current capacity).

The Department of Planning must also acknowledge that the South Australian Government is trying to shift Incitec's storage of AN in Port Adelaide due to explosion risk for residents, which is outlined by a SA Work Cover report. Such a massive concentration of ammonium nitrate storage with 800 m of residents is not acceptable to the communities that surround the proposal.

Air Pollution

I'm deeply concerned that Incitec's plant will only add to already deteriorating air quality. Stockton residents currently experience high, increasing levels of coal dust, diesel particulates from industry and nitrous oxides from Carrington and Kooragang as well as other substances (please refer attachment 1 from the Newcastle Herald (NH) of the 8/10/2012 and attachment 2 of the (NH) of 23/10/2012. The figures documented are of a magnitude that governments cannot justify self monitoring by facilities.

Two large scale ammonium nitrate plants, operating so close to residents creates an especially high concentration of NOx gases that are detrimental to respiratory health, especially the young and elderly.

Orica's expansion and other current proposals, further impact future air-quality and Incitec's Air Quality tests does little to abate my concerns regarding air pollution.

Noise Pollution

Industrial noise, especially night-time noise is already a major concern which impacts me. Incitec's EIS noise monitoring of the site was conducted when Orica's ammonia plant was not even in operation and proved that Orica is not meeting acceptable noise levels.

Furthermore, Incitec in their EIS, argue that "it is appropriate to relax the recommended levels for suburban areas by 5dB".

Here are some extracts taken from different sections of Incitec's EIS on Noise.

"As the existing level of industrial noise exceeds noise amenity criteria recommended by the EPA's Industrial Noise Policy (INP) by a significant margin, alternate operational noise criteria has been nominated for the Project.

"whilst the appropriate zoning in Stockton recognised as suburban, considering the adjoining industrial zoning it must be noted that a suburban/industrial interface exists. The Industrial Noise Policy, does not provide recommended industrial noise levels for suburban/industrial interfaces and therefore it is considered appropriate to relax the recommended levels for suburban areas by 5db.

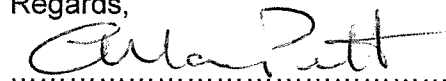
"Given that IPL and Orica are the only two operators that could materially influence industrial noise, it's is proposed the adjacent sites assume an equal responsibility in achieving the nominated levels."

As a resident personally affected by noise from Carrington and Kooragang Island, and proposed developments I find the assertion of Stockton being an 'interface' suburb offensive and the idea for government to 'relax' noise limits completely absurd.

How can industry be trusted when existing plants are well above night-time noise limits and Incitec are requesting special considerations?

The cumulative effects of all future developments must be analysed.

Regards,



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Allan Pitt
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NSW 2295

Attachments:

- 1- Toxic Footprints- NH- 8/10/2012
- 2- Stockton Dust Levels- NH- 23/10/2012
- 3- Political Disclosure Statement

Toxic footprints

MMH - 8/10/2012.

By MATTHEW KELLY
Environment Reporter

RESIDENTS in the Hunter's most toxic postcode footprint are being exposed to some toxins at levels more than 100 times higher than they were a decade ago.

Many residents of postcode 2304, which includes Kooragang, Mayfield, Warabrook and Sandgate, fear increasing industrial activity will bring a return to the pollution levels not experienced since BHP's heyday.

A *Newcastle Herald* analysis of National Pollution Inventory data shows the number of pollution-generating industries in the area increased from nine to 16 between 2001 and 2011. The number of pollutants increased from 35 to 38.

While tougher pollution controls have resulted in a decrease in some emissions, such as arsenic, lead and mercury, others have increased.

Ammonia emissions increased 168 per cent, benzene by 600 per cent, sulphur dioxide by 312 per cent and carbon monoxide by 6 per cent.

The majority of the increased industrial activity in the postcode area has occurred on Kooragang Island, which is set to become home to more industry in the next decade. Among the largest is the proposed \$5 billion fourth coal loader.

The cumulative impacts of airborne pollutants are of greatest concern.

"There's certainly more

pollution than there was a decade ago," former BHP worker and lifelong Mayfield resident Gionni DiGravio said.

"If a place like Mayfield, one of the birthplaces of the Hunter, is still dealing with pollution issues then you know that's where the country is at. We are still in the fossil fuel world, we are not really targeting new technology at all," he said.

An Environment Protection Authority spokeswoman said the conditions of environment protection licences should prevent pollution, maintain environmental standards and monitor environmental performance.

The authority may also order licence holders to undertake pollution reduction programs.

"For example, the authority recently required Koppers Carbon Materials to introduce nitrogen blanketing to naphthalene tanks on its premises...resulting in a reduction in naphthalene emissions from the site's process tanks," she said.

New legislation was introduced to strengthen requirements for industry to notify and respond to pollution incidents in the wake of Orica's hexavalent chromium spill on Kooragang Island.

Greens MIP Cate Fraehmann said pollution licences needed to take into account an industry's cumulative effect rather than being assessed in isolation.

Editorial, Page 10
Poll, theherald.com.au

THE AIR UP THERE			
Substance	Total emitted (kg)*		Change %
	2001	2011	
Ammonia	180,000	520,000	188%
Benzene	20,000	140,000	600%
Boron compounds	10	287	2770%
Carbon monoxide	6,700,000	7,100,000	6%
Chlorine and compounds	350	510	45%
Ethylbenzene	6,300	7,700	22%
Fluoride compounds	190	3000	1476%
Hydrochloric acid	680	19,000	2694%
Nickel and compounds	280	300	7%
Oxides of nitrogen	1,600,000	2,600,000	62.5%
Polyyclic aromatic hydrocarbons	2300	2450	6.5%
Selenium and compounds	3	6.8	3.8%
Sulphur dioxide	80,000	330,000	312%
Toluene (methylbenzene)	47,000	75,000	59%

*Figures are total for suburbs in the 2304 postcode

Stockton dust levels above national average: residents

By ALISON BRANLEY

STOCKTON residents say the results of the first week of dust monitoring in Stockton have confirmed their worst fears.

The Stockton Air Quality Monitoring Station showed air quality averages were above national averages and targets.

Stockton Community Action

Group spokesman Keith Craig said the results showed a worrying trend of dust levels coming from Kooragang Island.

"It unfortunately confirmed what we thought," he said.

"This monitoring clearly shows we are getting high levels of dust that exceed standards."

The group is awaiting an analysis of the dust but expects it will

show coal dust particles from coal stacks and ammonium nitrate from Orica.

Mr Craig rejected suggestions that the dust could be blowing in from the Upper Hunter.

He said particulate readings increased very quickly after the wind picked up.

"If it was coming from up the valley it would take half an hour

or more," Mr Craig said.

An Orica spokeswoman said "numerous factors" including wind direction, humidity and natural events could influence dust levels.

"Orica is investigating particulate emissions from its existing prill tower to determine whether there are opportunities to further reduce emissions," she said.

Newcastle Morning Herald - 23/10/2012

Tuesday, Oct

Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

Disclosure statement details				
Name of person making this disclosure <i>Allan Charles Pitt</i>		Planning application reference (e.g. DA number, planning application title or reference, property address or other description)		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION (YES) / NO				
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<i>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</i> <i>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</i> <i>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</i>				
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Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date <i>Allan Charles Pitt 23/10/2012</i>				
Name(s) <i>Allan Charles Pitt</i>				