

Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
Sydney 2001

65A Fullerton Street, Stockton

5 October 2012

This is a submission **OBJECTING** to the proposed Incitec Ammonium Nitrate manufacturing facility on Kooragang Island (SSD-4986) in Newcastle.

My husband and I relocated to Stockton from Sydney in 2011. We purchased a house in Fullerton Street and celebrated 12 months of living in Stockton last weekend.

We were attracted to Stockton because of its unique location between the harbor and the sea, and the character filled village with a friendly and small community.

We were concerned about the ongoing breaches at the Orica Plant on Kooragang Island prior to our purchase, but were reassured by the ongoing consultation between Orica, the EPA and local residents to address issues of concern.

WE WOULD NOT HAVE PURCHASED OUR PROPERTY IF WE HAD KNOWLEDGE OF THE PROPOSED INCITEC FACILITY.

This is because we have grave concerns about the **accumulative risks and hazards** of two ammonium nitrate plants side by side on Kooragang Island in close proximity to other industrial plants and activities, and only 800 meters from a residential area.

The accumulative risks and hazards form the basis of my objection to the proposed facility and are outlined below:

Explosion Risks

If the Incitec facility proceeds, it will have capacity to store significant amounts of ammonium nitrate up to 12,500 tonnes. Orica (in their plant next door to the proposed Incitec plant) currently have capacity to store 9,000 tonnes. Nowhere else in the world is such a huge quantity of ammonium nitrate stored within 800 metres of a residential community.

The consequences of an explosion involving this amount of ammonium nitrate are horrific.

Whilst the chance of an explosion may be small, ammonium nitrate is highly combustible under a range of conditions including fire, shock and contact with contaminants. Unfortunately there have been a number of 'accidental' explosions in other parts of the world resulting in death, injury and destruction.

I therefore believe that it is unsafe and unacceptable to store such a large amount of ammonium nitrate within 800 metres of a residential community.

It is totally unacceptable to expose residents to a risk that has potential for damage to life and property.

Incitec have not provided adequate information on the explosive risk and radius of risk to local residents in the event of an explosion in their Environmental Impact Study (EIS), and no emergency/evacuation plan has been provided.

I find this concerning and unacceptable.

Noise Pollution

I currently experience high noise levels from industry on Kooragang Island, particularly at night when the noise levels exceed the EPA 45dB standard for residential suburbs.

The proposed Incitec facility would further increase industrial noise which is already above the EPA recommended levels.

I was appalled to read in the press (Newcastle Herald 19/9/2012 pages 1+4) that Incitec (in their EIS) have called for an increase in the allowable noise levels in relation to their proposed facility, as they consider that an 'industrial/suburban' interface exists in relation to Stockton (NB: the EPA policy does not recognize this type of zone AND STOCKTON IS ZONED AS **RESIDENTIAL**)!

Incitec go on to say in the article that they consider it appropriate to relax the EPA noise guidelines for Stockton due to the 'industrial/suburban interface' - Stockton should not be subject to 'residential' EPA noise limits in their opinion.

Incitec state 'as the existing level of industrial noise exceeds noise amenity criteria recommended by the EPA's Industrial Noise Policy by a significant margin, alternate operational noise criteria has been nominated for the project'(quote from the Newcastle Herald 19/9/2012, page 4).

I am shocked by this blatant disregard of EPA policy and disregard for the Stockton residents who will be affected by increased noise levels.

The Incitec EIS proposal for increased noise levels is insulting and totally unacceptable.

Air Pollution

The Incitec plant will also add to cumulative impacts on air quality in surrounding suburbs by releasing fine particles of ammonium nitrate from the Prill tower and nitrous oxides from the nitric acid plant.

Both these pollutants can affect the health of residents and Stockton residents have already had recordings of PM10 particles in excess of the standard 50 ug/m3.

I also experience high levels of coal dust (as evidenced by the need to clean our cars and outdoor furniture regularly), and experience unpleasant smells associated with existing industry.

The Incitec facility will add to our high levels of existing air pollution and have potential to further compromise the health and well being of local residents.

This is not acceptable.

House Prices

As I mentioned in my opening paragraph, my husband and I would not have purchased our property in Stockton 12 months ago, if we had known about the Incitec proposal.

We do not want to live alongside another ammonium nitrate plant with the associated risks and impact on pollution and quality of life.

We already experience significant impacts from industries nearby and on Kooragang Island.

Potential buyers to Stockton may well share the same concerns and hesitate to purchase if the Incitec facility proceeds, and housing prices will fall.

In conclusion, I believe that the Environmental Impact Statement (EIS) provided by Incitec Pivot fails to address the accumulative impacts of the proposed Ammonium Nitrate Manufacturing Facility with existing industry and activity on Kooragang Island and adjoining areas.

There are risks and hazards to the residents of Stockton and nearby suburbs of Newcastle associated with the proposed Incitec facility.

These risks and hazards will be compounded by the risks and hazards that already exist from industrial activity on Kooragang Island and the adjoining area.

Incitec have failed to address this in their EIS.

I strongly object to the Incitec proposal (SSD-4986).

As submission makers are required to disclose political donations totaling \$1000 or more in the past 2 years, I can state that **I have not made a disclosable donation.**

Yours Sincerely,

Cathy Shorland

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