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**Re: Development Application No: SSD-4986
Incitec Pivot Ammonium Nitrate Manufacturing Facility**

RESPONSE TO INCITEC PIVOT – AMMONIUM NITRATE PLANT PROPOSAL

My wife and I jointly own property in Stone Street, Stockton. We are totally opposed to Incitec Pivot installing an ammonium nitrate plant at Kooragang Island.

We have no confidence in the NSW government departments and agencies ensuring that the new plant will be designed and built to the required codes and regulations and that its operation will comply with the required codes and regulations and that the required codes and regulations actually ensure the ongoing safety of the surrounding residents.

Issues relating to the existing Orica ammonium nitrate plant on Kooragang Island show that the NSW government departments and agencies have failed to ensure a safe environment both now and in the past.

The ability of the NSW Dept of Environment to respond to industrial emissions and emergencies or to adequately enforce and regulate effective environmental compliance within the local chemical industry has been demonstrated to be non-existent. WA is the only state that has an “on call” emergency response unit which has the capability to monitor effectively and quickly respond to a “situation”.

The recent spate of chemical spills and emissions from Orica (such as the Chromium 6 incident) clearly demonstrate that the safety of surrounding residents is at risk. Further, it stands to reason that the risks associated with living in the area will reduce the value of property and realizable rents in surrounding areas. Personally, we have had greater difficulty in letting our property and we had to reduce the weekly rent to attract a tenant since the recent spills became public.

In short, with an already existing hazard and liability in the area, why increase the risks by adding more similar chemical industry. The positioning of large, dangerous chemical industries close to heavily occupied residential areas just doesn't make sense. Consider the consequences of the methyl isocyanate gas leak disaster in 1984 at Bhopal India when an estimate 8,000 people died and an estimate 500,000 people were injured.

With ammonium nitrate factories, there is also the added hazard of explosives. Our understanding is that the driving economics for Incitec Pivot and Orica to expand is to supply explosives to the mining industry. These factories store thousands of tonnes of ammonium nitrate which combined with fuel oil is the basic explosive for mining. So, as well as being environmental and chemical risks, these plants are also a huge explosive risk.

The logical thing would be to build these types of chemical plant away from heavily occupied residential areas and to remove existing aged plants such as the Orica plant (instead of expanding the capacity without correcting the existing faults, which I believe is currently what is planned at the Orica plant).

Having lived in Stone Street Stockton for a number of years, my wife and I can relate the following experiences:

- The prevailing wind blows directly from Incitec Pivot and Orica directly across the water to Stone Street. A distance of approximately 800m.
- Orica operates an ammonium nitrate plant including prill manufacturing and storage facilities. (The same type of facility proposed to be installed by Incitec Pivot).
- The Orica facility has an EPA licence and apparently meets all of the stringent requirements which Incitec Pivot are claiming their new facility will comply to. However, the Orica plant regularly -
 - Discharges thick clouds of ammonium nitrate prill dust:
 - Which normally blows straight across the water to Stockton due to the prevailing winds.
 - The dust is sometimes so thick that it is like a heavy fog through which you can see about 50m only.
 - The Prill tower appears to have no dust control or containment
 - From observation it appears that Orica operate the prill tower mainly at night to hide the dust discharge.
 - The dust has a strong odour and settles to the extent that it is necessary to daily wash down outdoor living areas to be able to use them.
 - It is not practical to leave windows and doors open for cooling and ventilation due to the dust exposure.
 - Discharges an ammonium odour
 - Which normally blows straight across the water to Stockton due to the prevailing winds.
 - It is not practical to leave windows and doors open for cooling and ventilation due to the odour
 - Generates a loud background noise 24 hours per day
 - Due to the prevailing wind projects across the water to Stockton
 - A loud “roaring, whining” noise which I think is generated by large fans
 - It is not comfortable to leave windows and doors open for cooling and ventilation due to the noise.
 - Discharges a thick dark orange brown plume from the tall chimney
 - I believe this is a plume of Nitrous Oxides which is discharged when one of the processes is started up, stopped or accidentally trips.
- The Orica plant has had numerous leakage incidents such as:
 - The Chromium 6 discharge
 - Chemical spills
 - Ammonium leaks

- As an example of our experience of the non existent capability of either the NSW government depts and agencies or Orica to deal with a major event I relate the following.
 - Sirens went off at the Orica plant on Kooragang Island in the small hours one morning. I went outside to investigate and was confronted with a very strong odour of ammonium gas. I rang the Orica phone number and was diverted to an answering machine at Orica head office in Melbourne which gave me information on business hours. I rang the police and the person I spoke to had no information about what was going on or what to do, but suggested I ring the SES. (State Emergency Service). I rang the SES and the person I spoke to had no information about what was going on. The sirens continued to sound until the morning. I rang Orica at Kooragang the next morning and found out there had been a power trip and an ammonia discharge. Some time later (days) I had a call back from a public relations person from Orica. I asked what a local resident should do when alarms go off and ammonium gas is evident. My recollection is: *“stay inside and close windows and doors. Orica will notify the SES and if necessary the SES will evacuate the effected area.”* My perception is that if there was a major ammonium discharge all the local residents would simply be dead. We were surprised to find that in the following day/s there was no coverage in the media of the events during the night. When the Orica public relations lady phoned I also took the opportunity to ask if the planned / proposed upgrade to increase the capacity of the plant was going to address the problem with the prill tower and stop the dust emissions during the prill process. My recollection of the response was that it would be difficult to modify the existing prill tower and install dust control, so this was not going to be part of the proposed major expansion.
 - I was driving into the entrance of Stockton one day and noticed a very thick orange green discharge plume from the tall chimney at the Orica Plant on Kooragang Island. These plumes were reasonably frequent occurrences, however this particular time the discharge continued on for a long time (many minutes) and the plume seemed to carry right across the sky. I phoned the NSW Dept of Environment to report the incident and again I was surprised to find that was the last I heard of the incident from either the EPA or the media.
 - There was in general, no dissemination of information by Orica or any Govt department or agency to inform the surrounding residents of what to do in the event of a chemical discharge or what the emergency procedure where (if any)

In conclusion my wife and I are totally opposed to Incitec Pivot building a new ammonium nitrate plant at Kooragang Island, we are also totally opposed to Orica expanding their existing ammonium nitrate plant on Kooragang Island. We request that Orica remove their existing decrepit ammonium nitrate plant from Kooragang Island and both Orica and Incitec Pivot invest in new ammonium nitrate plants in a more appropriate location which is not next to a heavily populated area. We request that the NSW government invest in an emergency response and monitoring group such as operated by the WA government. We request that Chemical industries and the

Government departments and agencies inform and educate the surrounding residents to chemical factories about the hazards and what procedures are in place in the event of a chemical leak.