

## OBJECTION TO INCITEC PIVOTS PROPOSED AMONIUM NITRATE PLANT KOORAGANG ISLAND (SSD-4986)

Simon Taylor  
155 Mitchell Street  
STOCKTON NSW 2295

27<sup>th</sup> October 2012

Mining And Industry Projects  
Department Of Planning and Infrastructure  
GPO Box 39  
SYDNEY 2001  
FAX: 02 9228 6466  
Nicholas.Hall@planning.nsw.gov.au  
plan\_comment@planning.nsw.gov.au

Attention: Mr Nicholas Hall

**Submission - Project Application: SSD-4986****OBJECTION TO INCITEC PIVOTS PROPOSED AMONIUM NITRATE PLANT  
KOORAGANG ISLAND (SSD-4986)**

As a resident of STOCKTON NSW please accept this submission of objection regarding Incitec Pivot's proposed Ammonium Nitrate Plant on Kooragang Island NSW.

As the submission maker I have not made a political donation totalling \$1000 or more in the past 2 years.

In my opinion the proposal to build such a facility in a densely populated urban environment is completely unacceptable.

The proposal creates unacceptable risks to the environment and the community and also places a large burden on both the environment and the community for the duration of its operating life and for many years after its decommissioning.

The detrimental impact for the proposed facility far outweighs the limited economic impact to the region.

The proposal does not adequately address the impact the development will have on the environment including the impacts on both the natural and man-made environments, its social impacts and its limited economic impacts.

I object to the proposal, but if the proposal is to be accepted the following conditions need to be made part of their license:

**1. ZERO POLLUTION**

Zero pollution from the facility. Using world best practice and modern technology all gases, liquids etc. can be captured and processed for removal from site. So the facility has no need to vent, drain anything into the environment.

**2. WORLD BEST PRACTICE NOISE LEVELS**

World best practice buffering and noise reduction technology needs to be implemented to ensure that the noise levels emanating from the plant are minimised to at or below residential requirements. Building facilities in and around residential areas means that they must be bound by residential requirements and not industry levels.

**3. ENVIRONMENTAL MONITORING**

An independently run and operated environmental monitoring network of both water and air quality needs to be setup before the plant can be constructed. This network needs to be funded by Incitec Pivot and monitor all pollutants in the water and air. The data being available real time to residents and any interested parties.



## OBJECTION TO INCITEC PIVOTS PROPOSED AMONIUM NITRATE PLANT KOORAGANG ISLAND (SSD-4986)

**4. ANNUAL LICENSE**

Incitec Pivot's license needs to be reviewed for compliance annually and updated annually to the latest world's best practise conditions, a society requires from its industry to ensure the safe operating of this facility now and into the future. As environmental practises change the facility must change with them.

**5. ADDRESS COMMUNITY CONCERNS**

All community concerns must be addressed to the satisfaction of the community before the facility is even considered. Incitec Pivot may own and operate the facility but the community bears the cost of the facility being located in a high density residential urban centre.

**6. BILLION DOLLAR DISASTER COMPENSATION FUND**

Incitec Pivot must establish an independent compensation fund to cover compensation of person, environment, business and buildings if in the event an accident does occur as the insurance industry does not cover these events. This fund needs to be put in place before the facility is built and adjusted annually to reflect the true cost if a catastrophic event was to occur. To ensure the true cost is known, for example Incitec Pivot as a minimum must provide independent valuations of all residential housing in the area.

**7. DESTRUCTION OF NEWCASTLE AND COAL INDUSTRY**

Incitec Pivot needs to install worlds best practice measures to minimise the effects of an explosion to the surrounding area. This is not installing systems to avoid an explosion but physical systems to minimise the explosive damage to no further than Incitec Pivots facility boundary. These measures must be implemented before the facility is built. An explosion of the proposed stock piled ammonium nitrate would destroy Newcastle and our multi billion dollar coal industry.

**8. EVACUATION PLAN FOR RESIDENTS**

Incitec Pivot must implement an evacuation plan for all residents in case of an emergency. Presently Stockton for example only has one access road that runs parallel to the proposed site. In the event of an emergency that route will become unusable trapping all Stockton residents. Incitec Pivot must design, construct, and regularly practice suburb wide evacuations of Stockton without using the single access road to ensure in the event of an emergency all human lives are saved.

**9. ONE STRIKE RULE**

Incitec Pivot must agree to a one strike rule. If they breach any of the licences then the plant will be permanently decommissioned and the land returned to its natural state and gifted to the people of Newcastle as a park.

**10. TRANSPORT OF OXIDISING AGENT**

The transportation of Ammonium Nitrate though residential areas in bulk is an unacceptable risk to residents. If there is an accident, the potential for a catastrophic explosion and loss of life is very high.

**11. STORAGE OF PRODUCT**

Due the high risk of explosion, the facility should be limited in what quantities of ammonium Nitrate can be stored on site at any one time. This should be limited to a level that ensures if an explosive event occurred the blast radius would not leave the facilities boundaries. Preliminary investigations reveal that this would be less than 100 tonnes. An independent report needs to be commissioned and published to find the true impact of an explosion.

**12. FULL DISCLOSURE**

Incitec Pivot must as a matter of course provide full disclose on the facility's environmental and explosive effects. Providing little or no details under the guise of national security for such things as explosion shows that the facility is high risk and should not be allowed to be constructed in a densely populated urban environment.



OBJECTION TO INCITEC PIVOTS PROPOSED AMONIUM NITRATE PLANT KOORAGANG ISLAND (SSD-4986)

**13. TERRORIST SECURITY**

Incitec Pivot must install a post 9/11 world security system both in and around the facility to protect it from terrorist attack. This facility must be world best practice to ensure both its external and internal boundaries cannot be breached and that storage of explosive materials is protected and fully accounted for.

In conclusion, the proposal does not adequately address the impact the development will have on the environment including the impacts on both the natural and man-made environments, its social impacts and its limited economic impacts.

For the facility to be approved Incitec Pivot's license must contain the 13 items listed above as a minimum before it should even be considered.

Until this is done I object to the proposal.

Regards,



Simon Taylor  
27<sup>th</sup> October 2012