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Mining and Industry Projects  
Department of Planning and Infrastructure,  
Attention: Mr Nick Hall  
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SYDNEY NSW 2001

**SSD-4986, submission in regards to proposed ammonium nitrate plant on Kooragang Island**

I want to put forward my strongest objections to the proposed Incitec Pivot's ammonium nitrate plant on Kooragang Island.

From what was said in a public meeting in Stockton on 19 September, it is apparent that only the closest suburbs to the proposed plant, Stockton and Mayfield, have received any information of Incitec Pivot's plans. As an explosion would affect the whole of Newcastle, it is my view that the company's public consultation has been false and deceptive.

It beggars belief that the government would put the city of Newcastle and it's residents at considerable risk for the sake of 60 jobs. I understand that the N.S.W. government is reliant on the mining industry for a great deal of financial support but PLEASE consider the possible consequences that this decision will have:

My strongest concerns are:

**The risk of explosion.**

The devastating effect of an explosion at the plant would have on the City of Newcastle is unimaginable. The total amount of ammonium nitrate, to be stored at the plant, is 12,500 tons plus the 9,000 tons at the Orica plant, if ignited would amount to an explosion equal to the Hiroshima bomb. If only 300 tons were to ignite as in Toulouse, Frances in 2001, all within a 3 to 5 kilometre radius of the plant would be affected.

No amount of precaution can eliminate the risk of an explosion as is evident by the number of explosions worldwide (8 major events this century). An explosion could be caused by human error, the consequences of nature as in fire/lightning strike or earthquake or deliberate human intervention as in an act of terrorism (with ammonium nitrate being the explosive of choice for terrorist worldwide).

The company, in its hazard analysis, has kept some documents outside the public domain:

- Appendix C, Hazard identification
- Appendix D, Consequence analysis
- Appendix E, Frequency analysis
- Appendix F, Risk analysis

Without access to these documents, the hazard analysis cannot be fully assessed and my conclusion is that the company wants to keep this information secret to prevent the public to make informed judgement about the risks involved with the plant.



### **Air Pollution.**

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

The residents in surrounding suburbs are already exposed to high levels of coal dust and proposed projects including T4 and Incitec will add more fine particles.

The extra diesel truck movements will add to dangerous carcinogenic fine particles and nitrous oxides levels.

Orica has a very bad record in this regard with over 100 breeches of its licence and the closure of the plant in November 2011 following serious breeches. Will Incitec, who once operated the Orica plant, be any better???

### **Noise Pollution.**

Excessive noise from Kooragang Island is already affecting the residents of Stockton. The current noise levels are above the standard for suburbs and Incitec using this as an excuse to increase them is insulting and an indicator of the regard they have for the surrounding communities well being.

### **Traffic Impacts.**

The traffic is already a major problem on Kooragang Island, being a major link road. The increase in truck movements associated with the plant will aggravate the traffic problems.

### **Employment.**

As the new plant will only be employing 60 people it is hard to see this as a good enough reason to put the whole of Newcastle at considerable risk.

There are clean industries that could be more suitable, bringing more employment and not impacting on the quality of life in this beautiful city of Newcastle.

There can be development and financial growth for the community without resorting to high-risk industries near city centres. Germany is a fine example of industrial growth and development whilst keeping clean and green. On a recent trip we were amazed at the amount of solar and wind farms they have close to urban areas. Stockton would be ideal for the development of wind power.

**In conclusion:** The impact to the whole of Newcastle if there was an accident on Kooragang would be devastating. I believe that there is considerable risk of this happening, with the very poor safety performance at the Orica plant as evidence and therefore have no reason to believe that Incitec's standards would be any better so I ask that commonsense prevail and that the proposed ammonium nitrate manufacturing facility not be approved.

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

Regards



Frances Cahill