

## Response to Emergencies in Victoria

There are many issues to do with Safety in the State of Victoria and we are sure that many of those issues will be covered well by those with personal experiences and professional expertise. However the safety issue of great importance to residents and workers in Williamstown is the dangers associated with the major hazard facility and fuel importation at Point Gellibrand.

In 2010 former Planning Minister Justin Madden, decided contrary to his recently signed off Industrial Land Management Strategy (ILMS) for Hobsons Bay, to rezone land at the Former Port Phillip Woollen Mill Site (Precinct 20 in the ILMS) to Residential Zoning instead of the more suitable zoning Mixed Use with consultation of an array of stakeholders as detailed in the strategy.

During February/March 2011 the Planning Minister's Port Phillip Woollen Mill Advisory Committee <http://www.dpcd.vic.gov.au/planning/panelsandcommittees/current/former-port-philip-woollen-mill-advisory-committee> sat and heard evidence from the Developer, the Stakeholders, various Government Authorities and the Community about what sort of development should be approved for this site, with the instruction from the former minister that "Residential Rezoning would not be revisited". [http://www.dpcd.vic.gov.au/\\_data/assets/pdf\\_file/0011/48494/TermsofReferenceforFormerPortPhillipWoollenMillsAdvisoryCommittee.pdf](http://www.dpcd.vic.gov.au/_data/assets/pdf_file/0011/48494/TermsofReferenceforFormerPortPhillipWoollenMillsAdvisoryCommittee.pdf) The developer's proposal was for a 50m residential tower block within 300m of the MHF at Pt Gellibrand, Williamstown and would include about 1000 new residents. The residential zoning was a very serious error as far as the community, stakeholders and government authorities were concerned but we were all formally prevented from talking about the need for a Risk Assessment and the unsuitability of the residential zoning.

In final submission 24th February 2011, to the Advisory Committee (whose report is still with the Planning Minister and may not be released) Mobil (part of the largest company in the world Exxon Mobil Corporation) stated:

93. "Mobil takes the management of risks associated with its operations very seriously and it is incumbent on Mobil as a responsible member of the community and an MHF facility to bring these risks to the attention of the Committee. It will be documented for future reference that **Mobil have raised the issues of people safety**, environment issues and reverse buffer requirements in a sensible manner so it can be clearly understood by the Committee and others."

Thus Mobil formally put in writing to the committee and to the minister that it was concerned about people safety in the context of new residential development. Further, within the international oil industry a standard of 10 times the diameter of the tanks is considered appropriate. One of the Mobil tanks at Pt Gellibrand is 40m diameter thus a 400m buffer distance was referred to.

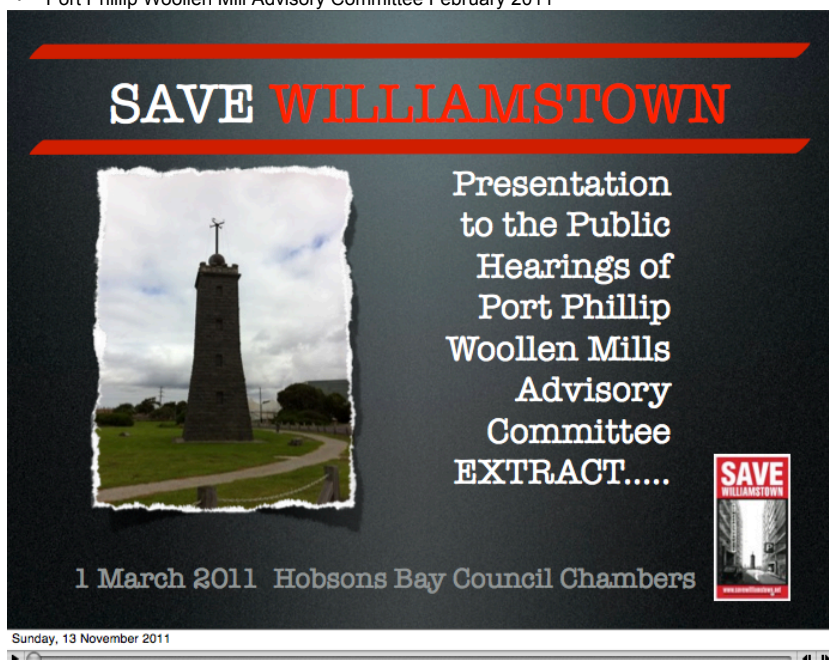
However at Pt Gellibrand the MHF tanks operated by Mobil are not the only potentially dangerous part of the facility for the existing community and existing workers, FUEL IMPORTATION is also a dangerous process. In some parts of the Australia there are defined safety buffer distances for fuel importation ie in Western Australia a 1000m buffer distance is required by the EPA there.

[http://www.epa.wa.gov.au/docs/1840\\_GS3.pdf](http://www.epa.wa.gov.au/docs/1840_GS3.pdf)

It is understood that the commonwealth National Ports Strategy is also looking at suitable buffers distances and may implement national standards. [http://www.infrastructureaustralia.gov.au/gateways/files/National\\_Ports\\_Strategy\\_DEC2010\\_v2.pdf](http://www.infrastructureaustralia.gov.au/gateways/files/National_Ports_Strategy_DEC2010_v2.pdf)

The problem for Mobil in providing expert opinion to the Advisory Committee re Fuel Importation is that Mobil regards the shipping tankers as couriers and therefore could not report of shipping safety. Oil Tanker ships are separate entities registered in overseas countries which are subject only to random inspection by the commonwealth government maritime authority. At the advisory committee, the community was able to present expert opinion from a captain of pilot vessels in Port Phillip Bay which are required to guide to berth the shipping tankers. This person also had experience of major fire incidents in the Indian Ocean and examples of shipping tanker fires in ports around the world. All these examples confirmed the wisdom of the Western Australian buffer distance of 1000m. The examples of fires on shipping tankers worldwide and the "invisible vapour cloud" experienced at Buncefield UK which were presented in the Community Submission by Save Williamstown are contained in the pdf file of extract of the relevant pages with references from 2nd submission is attached:

- Submissions to the Ports and Environs Advisory Committee Sept 2010
- Port Phillip Woollen Mill Advisory Committee February 2011



It should be noted in terms of risk that one matter which was advantageous in the M/V NORDEUROPA fire in Providence New York 2006 was that the ship was able to self evacuate sideways away from the port and minimise the on-shore fire dangers. At Pt Gellibrand the deepened channel from the main Port Phillip Bay channel (recently deepened to allow large vessels) requires Pilot boat assistance both into and out of the Port of Melbourne secure pier berthing where the transfer of fuel to Mobil is effected. In 2009 there was a loss of containment at Pt Gellibrand when the MT Lyte Spirit was impacted by a sudden squall.

Vessels arriving at Pt Gellibrand carry up to 150 million litres of fuel and take 4 days to transfer the fuel to pipelines and temporary storage in the tanks at Pt Gellibrand. Mostly the fuel is crude oil but at present petrol is arriving at Pt Gellibrand because the refinery at Altona is shut for maintenance and cleaning. Petrol is more dangerous and it is hoped that Mobil will not see economic advantage in permanently closing Altona and importing petrol from its larger refinery in Singapore. 70% of fuel for Victoria arrives at Pt Gellibrand and passes to Altona for refining and then to Yarraville beyond the Westgate Bridge for distribution. Pt Gellibrand is a customs secured port. Some fuel arrives in Westernport and is transferred by pipeline but unless and until larger pipes are constructed across the bay, Pt Gellibrand will continue to be a very important importation point for Victorian fuel.

A comparison with the 2011 Canberra Chemical fire:

The Canberra chemical fire (reported as involving 400 thousand litres of toxic chemicals) on Friday shows just what sort of impact can be expected to occur on the local community up to 10 km away, if there were a major explosion from a chemical source.

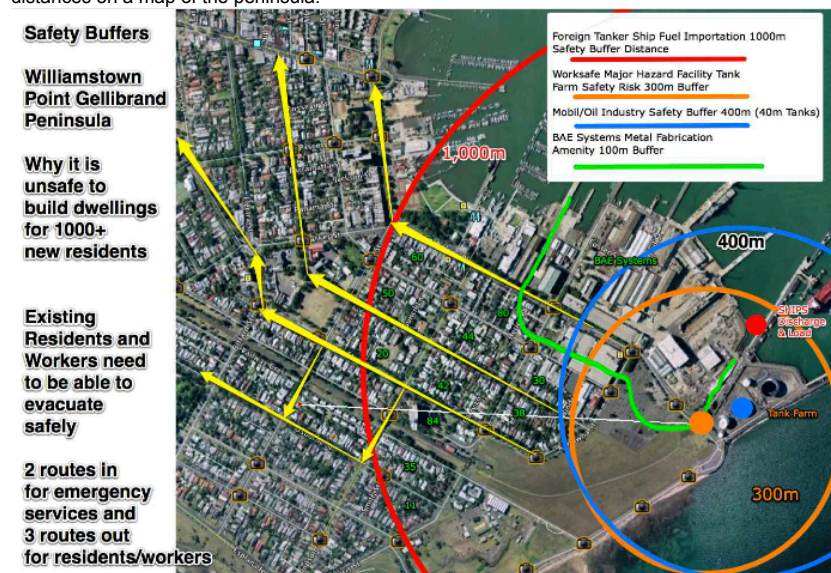
Point Gellibrand in Williamstown has over 2000 people living and working within 1 km of the Mobil Major Hazard Facility "MHF" (storage capacity of 50 million litres of fuel in its on shore tanks plus tanker ships in port with carrying capacity up to 150 million litres of fuel, which pump crude oil into the tanks and pipelines).

[http://www.savewilliamstown.net/Save\\_Williamstown/NEWS/Entries/2011/9/20\\_MHF\\_IMPACT\\_ON\\_LOCALS\\_Huge\\_WHAT-IF\\_for\\_people\\_safety\\_at\\_Point\\_Gellibrand\\_Williamstown.html](http://www.savewilliamstown.net/Save_Williamstown/NEWS/Entries/2011/9/20_MHF_IMPACT_ON_LOCALS_Huge_WHAT-IF_for_people_safety_at_Point_Gellibrand_Williamstown.html)

Please note that the Save Williamstown website <http://www.savewilliamstown.net> contains an archive of many articles of relevance to safety issues.

Although the Community objected to the high rise residential development in a heritage place which lacked community infrastructure for such an increase in population, the strongest argument against such development was the risk to existing population at Point Gellibrand.

As often happens in old places (and Williamstown is the place of first settlement of Melbourne) there are existing residents and workers where industry and town have coexisted for a long time and who need considering in safety and evacuation procedures. Our estimates are that there are 1500 workers at BAE Systems (international ship builders) who are immediately adjacent to the Mobil MHF, and 1000 residents to the east of the Railway line and to the south of the roundabout near Commonwealth reserve. We attach a Map which shows the buffer distances on a map of the peninsula.



In November at the Directions Hearing of the Port Phillip Woollen Mill Advisory Committee and in February at the start of the hearings, Save Williamstown and other community groups asked that the hearings be deferred until a full investigation of safety issues on the peninsula by the relevant government authorities was able to inform the advisory committee and the Planning Minister about risk to existing and potential future residents and set out suitable evacuation procedures. Deferral was not granted in February and the hearings proceeded with no reference to suitability of residential zoning. The community is VERY concerned that the safety of existing residents in responding to any incident would be compromised by the addition of another 1000 residents in close proximity to the MHF. A similar situation in NSW is Kurnell where there is now a moratorium on development because of the difficulties in evacuating that peninsula. The Kurnell report is found at: [http://www.planning.nsw.gov.au/plansforaction/pdf/luss\\_kurnell\\_feb07.pdf](http://www.planning.nsw.gov.au/plansforaction/pdf/luss_kurnell_feb07.pdf) page vii

*Although some extreme events at the refinery have a potential to impact beyond the Refinery boundary, the likelihood of impingement on residential areas is very low. Nevertheless, the possibility of these and naturally occurring extreme events, together with constrained road access to the Kurnell Village for emergency response and evacuation, reinforces the long standing Departmental position that residential development in the Kurnell Village should not be intensified.*

In Williamstown there is the potential for a major incident because of industrial & residential components present:

- There is a community - many living in old wooden houses, on narrow streets with limited routes in and out
- The police and water police are within the 1000m Fuel Importation buffer distance (letter to the police attached)



<http://www.savewilliamstown.net>



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Mr Simon Overland  
Chief Commissioner  
Victoria Police Centre  
637 Flinders Street  
Melbourne, VIC, 3005

Thursday, 4 November 2010

#### Human Safety & Buffer Distances from Fuel Importation at Point Gellibrand

Dear Mr Overland

Save Williamstown is a community organisation representing residents of Williamstown who are very concerned about a proposal to build high-density high-rise residential dwellings (up to 17 storeys) at Point Gellibrand, about 250m from the Mobil Major Hazard Facility.

The community has many concerns about the impact of such a high-rise, high-density development but the safe evacuation of thousands of existing residents and workers from the immediate area, as well as the risks to any future residents of the proposed development are of greatest concern and need addressing as soon as practicable. Given that the Williamstown Police and Water Police are located on Nelson Place, there is not only the first response to disaster issues but also locational issues for Victoria Police.

In particular, our concerns relate to the safety buffer distances which apply to the Mobil Facility Fuel Importation at Point Gellibrand and the safety for existing residents which would be detrimentally impacted by a 50% increase in resident population within a 1 km radius of the facility. We understand that following port deepening, vessels will discharge upto 950,000 barrels of crude oil per vessel at Point Gellibrand by 2015.

We have researched the various organisations which have involvement in human and environmental safety in the State of Victoria and conclude that NO RISK ASSESSMENT has been prepared for the MHF including fuel importation at Point Gellibrand and encroaching sensitive uses. Our research has included EPA, Worksafe, Hobsons Bay Council, MFB, CFA, SES, Port of Melbourne Emergencies, Municipal and Regional Emergency Response Team and the Office of the Emergency Services Commission.

The Victorian EPA recommendations as documented in "Recommended Buffer Distances for Industrial Residual Air Emissions" AQ2/86 July 1990, appear to concentrate of amenity issues and lack specific buffer distances relating to SAFETY RISKS for ship to shore (pipeline/tanker) fuel transfer at the port and the potential for a deadly "pancake shaped" invisible vapour cloud heavier than air to develop from any loss of containment.

This is in contrast with Western Australia's EPA document "Guidance for the Assessment of Environmental Factors (in accordance with the Environmental Protection Act 1986) Separation Distances between Industrial and Sensitive Land Uses No. 3 June 2005". This document includes tables which refer to impacts: gaseous; noise; dust; odour and RISK. The WA buffer distances in the tables do specify fuel importation. (see tables at: [http://www.epa.wa.gov.au/docs/1840\\_GS3.pdf](http://www.epa.wa.gov.au/docs/1840_GS3.pdf).)

The age profile of Williamstown is across all ages and there would be a number of persons with disabilities in the Gellibrand Peninsula. There would be a number of persons without mobile phones.

Save Williamstown believes that a RISK MANAGEMENT ASSESSMENT is needed for Point Gellibrand. We have asked Hobsons Bay Council to initiate this assessment in November 2010 but as far as we are aware nothing has happened. That last statement we believe says it all.. "as far as we are aware" ... as was very clear from the Bushfire Royal Commission it is VERY important that the community clearly understands what might happen and be prepared individually and as a community for what action needs to occur in the event of a major incident.

Pt Gellibrand has about 2500 people in the "line of fire" and any incident at the MHF or the shipping fuel importation facility and it would be a LARGE SCALE disaster. We love living in Williamstown and hope it never occurs but the community being prepared for a sudden incident would certainly be the best chance of saving life and limb. AND a moratorium on new development on the Peninsula is needed to avoid escalating the issues.