

022



Authorising Manager: Bruce Horide. Technical Manager – Environmental. E: bhoride@wastemanagement.co.nz. M: 021 474 393
 Contact person: Xenia Meier. Environmental Specialist. xmeier@wastemanagement.co.nz. M: 0274 416 130
 Alternative contact: Jonathan McLeod. Project Planner. E: jmcleod@wastemanagement.co.nz. M: 021 807 494

SUBMISSIONS POINTS:

Page No.	Reference	Support/Oppose	Decision Sought	Give Reasons
1	AQ P2	Support		Best practicable option is consistent with the RMA.
2	AQ P3	Neutral		What are the benefits or favourable treatments when an application is made by one of these infrastructures to discharge to air?
2	AQ P3	Support		'Minimisation' is an appropriate approach to manage air discharges that may emanate beyond the property boundary.
2	AQ P3	Oppose	Delete "contribute to"	The term "contribute to" is ambiguous in this context. A baseline or permitted low contribution level needs to be provided for this phrase to have any value.
	Policy 5	N/A	Include Policy 5 from Operative Air Plan.	The proposed plan change 13 no longer includes a policy on reverse sensitivity; therefore, there is no longer any Regional Council guidance on this matter.
13	AQ R18(2)(b)A. R18(2)(c)A. R18(2)(d)A.	Oppose	Include waste oil	The combustion of used oil is well established in New Zealand with guidelines in place for metals in HSNOCOP 63: Management and Handling of Used Oil. In addition, work commissioned by the Ministry of Environment (Assessment of the Effects of Combustion of Waste Oil and Health Effects Associated with the Use of Waste Oil as a Dust Suppressant. August 2000) has concluded that "combustion of processed used oil does not generate any significant adverse impact on atmospheric quality". Since coal is listed specifically, and a comparison of used oil combustion with coal indicates the used oil combustion generates comparable emissions to coal, it follows that used oil may safely be listed specifically in this rule (see Table 1 for further information).
14	AQ R18(3)A.	Oppose	Include waste oil Include landfill gas	Landfill gas and waste oil should be specified in (3)A. and treated with the same conditions as clean oil, coal, and untreated wood.

86 Lunn Avenue
Mt. Wellington
Auckland 1072

Private Bag 14919
Panmure
Auckland 1741

0800 10 10 10
wastemanagement.co.nz

12-14	R18	Oppose	Include combustion discharges from landfill gas flares	It is unclear whether the landfill discharges specified as 'discretionary' in R21 apply to discharges from landfill gas flares. Landfill gas flares up to 500kW should be specified as Permitted in R18.
14	AQ R18(3)B.	Oppose	Include landfill gas	Landfill gas should be specified in (3)B and treated with the same conditions as clean oil, coal, and untreated wood.
15	AQ R21	Oppose	<ol style="list-style-type: none"> 1. Separate refuse transfer stations out from the same group as resource recovery, recycling centres, and baling stations 2. Remove the requirement for resource recovery, recycling centres, and baling stations to hold an air discharge consent; these should instead have Permitted activity status 	Resource recovery / recycling / baling stations do not generate significant odour or emissions, and therefore consent is not required in most jurisdictions. Discretionary activity status would make consenting for such activities unnecessarily onerous. Land use zoning through district plans is a more appropriate way to ensure such developments are located in areas that do not cause adverse effects on the neighbouring area.
15	AQ R21	Oppose	Change the status of Refuse Transfer Stations from being Discretionary to Permitted.	<p>Appropriately located modern waste transfer stations have a minimal impact on neighbouring properties. In most jurisdictions, a consent is not required. Refer below to Auckland Council's specifications:</p> <p>(1) The premises must be in an industrial or rural area and have either:</p> <p>(a) a minimum separation distance of 300m from any dwelling on another property or any residentially zoned area; or</p> <p>(b) a minimum notional odour boundary of 300m through designation or an instrument registered against the land title of the owners of any residential property within 300m of the activity; and such designation or registered instrument must provide a restriction on the owners and occupiers of such land from complaining about any offensive or objectionable odour generated by the activity in respect of that property.</p> <p>(2) The waste transfer station must be designed to ensure that litter and dust is kept to a practicable</p>

86 Lunn Avenue
Mt Wellington
Auckland 1072

Private Bag 14919
Panmure
Auckland 1741

0800 10 10 10
wastemanagement.co.nz

					<p>minimum and with sufficient capacity to hold all refuse received on-site indoors or under cover.</p> <p>(3) All access and transfer areas must be sealed and designed with sufficient room for the movement of vehicles within the yard area.</p> <p>(4) The consent applicant must have clear protocols for:</p> <p>(a) acceptance criteria for materials delivered to the site;</p> <p>(b) odour, dust and litter mitigation; and</p> <p>(c) storage, handling and disposal of all types of waste accepted on the site.</p> <p>(6) There must be no shredding of green waste.</p>
--	--	--	--	--	--

Table 1. Emissions from coal fired burners compared to a thermal oil heater fired on used oil. Data compiled from an assessment of environmental effects prepared for Alliance Lorneville and Waste Management New Zealand Limited. For comparison purposes, emissions from the 4.5MW thermal oil burner are multiplied by a factor of 25 and 40 to account for fuel use differences.

	CFB 2	WO Burner x 25	CFB 1	WO Burner x 40	WO Burner (OR NI)
MW	12.7		18		4.5
Fuel use	4.57		7.23		0.18
PM ₁₀	2.3	[PM _{total}] 2	3.7	[PM _{total}] 3.2	[PM _{total}] 0.08
NO _x ¹	3.7	2.43	5.8	3.9	0.0975
SO ₂	8.4	7.25	13.4	11.6	0.29
Arsenic	4.1 x 10 ⁻⁴	4.4 x 10 ⁻⁵	6.6 x 10 ⁻⁴	7.1 x 10 ⁻⁵	1.7 x 10 ⁻⁶
Cadmium	2.7 x 10 ⁻⁵	1.7 x 10 ⁻⁶	4.3 x 10 ⁻⁵	2.8 x 10 ⁻⁶	6.9 x 10 ⁻⁸
Chromium	1.9 x 10 ⁻⁴	5.6 x 10 ⁻⁶	3.0 x 10 ⁻⁴	8.9 x 10 ⁻⁶	2.2 x 10 ⁻⁷
Lead	9.1 x 10 ⁻⁵	2.0 x 10 ⁻³	1.5 x 10 ⁻⁴	3.2 x 10 ⁻³	8.0 x 10 ⁻⁵
Mercury	7.6 x 10 ⁻⁵		1.2 x 10 ⁻⁴		

Assessment of Coal-fired Boiler Air Emissions. October 2015. Golder Associates
Waste Oil Recovery Facility, Totara Street. Air Quality Assessment. October 2018. Tonkin and Taylor.

86 Lunn Avenue
Mt Wellington
Auckland 1072

Private Bag 14919
Panmure
Auckland 1741

0800 10 10 10
wastemanagement.co.nz

