

Bay of Plenty Regional Council
87 First Ave
Tauranga 3110
New Zealand

30 October 2019

Attention: Reuben Fraser

Dear Reuben

Genera - Draft Air Dispersion Modelling Report

As part of the process of preparing an application to replace resource consent no. 62719 to discharge a contaminant (methyl bromide) to the air at the Port of Tauranga, Genera Ltd have had prepared an air dispersion model by Golder Associates Ltd.

This model has proved to be invaluable in shaping the replacement consent application enabling us to better understand the theoretical worst-case discharge scenarios that could arise and how the practice of fumigation/recapture/ventilation can be managed to mitigate the potential for adverse effects on the environment.

By its nature this has been an iterative process with the application presenting the 5th or 6th iteration including significant mitigation which the model shows will result in reduced potential for adverse effects when compared to earlier iterations.

In order to make sure that the model itself was accepted by you as an assessment tool we provided an earlier version to you for review. This version included a limited number of illustrative figures based on the 100th percentile output from the model which demonstrated the worst case of ventilation combined with the worst case meteorological event which represents the probability of occurrence over approximately 9 hours per year.

We note now that with increased mitigation, including active and adaptive monitoring of each ventilation, the 100th percentile isopleth for the one hour, 24 hour and annual TELs avoids all residential zones and the 99.9th percentile isopleth is 5 – 6 times lower than the 100th percentile, fitting within the Port boundary. These model results are generally corroborated by the monitoring that has been undertaken at the boundary, in particular when taking into account the recent significant (and permanent) decrease in the use of methyl bromide as a fumigant, largely as a result of the increased export of de-barked logs. The final dispersion model report provides greater explanation and more illustrative figures of the modelled outcome.

From our point of view the pre-lodgement review process has been most successful and has led to some significant positive changes to the model report and to the application itself. However, we are most aware that the draft dispersion model report remains on your files and may be subject to a LAGOIMA application and used in a way that it was not intended or interpreted in a way that does not align with its purpose as an interim, draft report (which has now been superseded).

As the draft has now served its purpose as an interim report for a purely technical review it would be appreciated if it could be returned to Genera. In the alternative it should be marked as being incomplete and superseded by the version submitted with the reconsenting application for the reasons noted above.

Thank you for your consideration.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'K Frenz', with a long horizontal stroke extending to the right.

Keith Frenz
Technical Director - Planning

on behalf of

Beca Limited

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Matt Hill, General Ltd