

**IN THE MATTER OF** The Resource Management  
Act (The Act)

**AND**

**IN THE MATTER OF** Proposed Plan Change 13 –  
Air Quality

**AND** Submissions by McAlpines  
Rotorua Limited (McAlpines)

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**Summary Statement by Deborah Anne Ryan, Jacobs New Zealand Limited  
On Behalf of McAlpines Rotorua Limited**

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**QUALIFICATIONS AND EXPERIENCE**

1. My full name is Deborah Anne Ryan.
2. I have a Bachelor's Degree in Biotechnology and Bioprocess Engineering from Massey University, Palmerston North (1991). I am both a member of the Clean Air Society of Australia and New Zealand and a Certified Air Quality Professional (CAQP) with the Society. I am also certified as a Hearing Commissioner under the Resource Management Act, Making Good Decisions Programme.
3. I have 26 years' of experience in the air quality and resource management fields. I spent eight years as an Air Quality Specialist with the Manawatu-Whanganui and the Waikato Regional Councils. I have been employed as a Senior Air Quality Consultant with Jacobs New Zealand Limited (formerly SKM) for the last 17 years and I am the Technical Leader for the Jacobs New Zealand air quality practice. I have extensive experience in air quality studies, preparing and reviewing a wide range of air quality effects assessments and managing and reporting on air quality monitoring programmes. As an air quality specialist, I have been responsible for reporting and presenting specialist advice to council resource consent hearings on multiple projects across all sectors: industry; infrastructure and government.

4. My experience in assessing the air quality effects of discharges from fuel combustion (including particulate matter), includes involvement in the environmental effects assessment for consents and/or monitoring compliance including: dairy processing sites with associated thermal energy plants, meat processing, rendering, wastewater treatment plants (WWTP), fellmongeries, landfills and wood processing sites. My work with wood processing sites has included: Brightwood at Otautau, Eurocell Upper Hutt, Hautapu Pine in Taihape, Timberlink in Blenheim, Kiwi Lumber at Dannevirke, Pacific Pine at Putaruru, Lumbercorp at Ohinewai, Winstone Pulp International at Tangiwai and the WPI Tangiwai Sawmill.
5. I have been contracted to provide specialist advice on air quality to regional councils and District Health Boards (DHB) including the Manawatu-Wanganui Regional Council, the Waikato Regional Council, the Otago Regional Council, Waikato DHB and Health Southland. I was the principal author of the Ministry for the Environment's Good Practice Guide for Assessing and Managing Odour in New Zealand (2003). I was contracted as the peer reviewer for the Ministry for the Environment's Good Practice Guide to Assessing Discharges to Air from Industry (2008).
6. I was seconded into the Regional Plan Team to develop the air chapter of the Waikato Regional Plan. I was later engaged as a consultant to develop consent orders to resolve plan appeals, undertake reviews of rules for open burning and domestic home heating (developing Section 32 documentation) and advised on a review of the Waikato Regional Policy Statement air provisions.

#### **INVOLVEMENT WITH THE MCALPINES' ROTORUA SITE**

7. Jacobs New Zealand Limited has been involved with air discharge matters at the McAlpines Rotorua Limited (McAlpines) site over a long period. Most recently we provided an Assessment of Effects on the Environment and technical advice for the Company's air discharge consent renewal process. I understand that the new air discharge consent is currently being decided in consultation with neighbours subject to agreement on the term of the consent. I have undertaken peer review of Jacobs' work relating to the consent renewal and I prepared McAlpines' submission on the Bay of Plenty Region Plan Change 13 - Air Quality earlier this year.

## MCALPINES' SUBMISSION

8. My statement provides comment on the staff recommendations on the primary submission points made by McAlpines as presented in the *Section 42A Report, Proposed Plan Change 13 Air Quality to the Regional Natural Resources Plan*, October 2018 (S42A). McAlpines did not make any further submissions.
9. I have reviewed the S42A Report and found that the staff recommendations address all the submission points and requests from McAlpines. McAlpines is in full agreement with the relevant recommendations in the S42A Report. I highlight key submission points below.
10. McAlpines' submission point 1 sought an additional matter in AQP4 to allow for consideration of an increase in the scale of an activity provided that there is no net increase in the rate of particulate matter discharges. The reasons included that such a provision would provide more certainty to the Company regarding continued investment and flexibility in future planning. The S42A Report recommendations include two additional matters for consideration:
  - “g) Whether a change to an activity expressly allowed by an existing resource consent will cause a net increase of particulates into an airshed in breach of the ambient air quality standard for particulates of the National Environmental Standards for Air Quality.*
  - k) The investment of existing infrastructure that mitigates adverse effects of discharges of contaminants to air.”*
11. These additional matters address the concerns that McAlpines had relating to AQP4 as it was proposed.
12. McAlpines' submission point 3 sought to ensure that antisapstain-treated wood was not included in Rule AQ R10, which provided for the activity but with non-complying status. This activity status was considered overly restrictive where such wood waste could be burnt with a level of environmental effects that could be assessed as being acceptable. The recommended changes in the S42A Report to reword AQ R10 and the addition of definitions of treated timber and untreated wood, in response to McAlpines submission point 6, address the concerns that McAlpines had with undue restrictions being placed on burning of antisapstain treated wood by the Proposed Plan Change.

13. Given the council staff recommendations accept McAlpines' primary submissions; or in the case of Policy 4, the submission is accepted in part but the recommendations wholly address McAlpines' concerns, McAlpines has not sought to prepare further evidence to support its submission. Should the Hearing Committee have any questions about McAlpines' operations, or the Company's submission, in addition to myself Mr Graeme Bell, the Manager of McAlpines Rotorua, and Mr Pedro Gelid a representative from Lonza NZ Ltd who supply the wood preservative chemicals to McAlpines are available. Mr Bell also has a short statement he would like to read to the Committee to highlight McAlpines' interests with the Plan Change.



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Deborah Anne Ryan

25<sup>th</sup> October 2018