

27 July 2022



GHD  
Attention: Sean Mooney  
138 Victoria Street, Level 3  
**Christchurch 8013**

Via email

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Christchurch 8140

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Dear Mr Mooney

## **Request for Further Information**

**Response required by:** 16 August 2022  
**Applicant Name:** Valmont Coatings  
**Record Number:** CRC224350 – discharge of contaminants to land and to groundwater  
**Property Address:** 27 Washbournes Road, Wigram, Christchurch

### **1. Request for further information**

As you are aware, Mike Freeman is processing the above resource consent application.

The information listed in Attachment 1 to this letter is requested under Section 92 of the Resource Management Act 1991 (the RMA). As this information is required to better understand the potential effects of the proposal, we are unable to further process the application until it has been supplied.

The options available to you under Section 92A(1) of the RMA are summarised below. A response is required by **17 August 2022**. You must choose one of these options.

#### **A. Supply the requested information by 17 August 2022.**

If the information can be easily collated and supplied by this date, please provide it in writing (via email is fine) to Mike Freeman ([mike.freeman@landpro.co.nz](mailto:mike.freeman@landpro.co.nz)).

#### **B. Agree in a written notice by 17 August 2022 to supply the information requested**

Sometimes technical information will take some time to collate or key contacts may not be immediately available. If you need more time to supply the information requested, please advise Mike in writing when you can provide the information. You can do this via email or letter.

#### **C. Refuse in a written notice by 17 August 2022 to supply the requested information**

**If you choose not to provide the requested information by the above date, or any date subsequently agreed to by the Canterbury Regional Council, then your application must be publicly notified and may be declined.**

Public notification enables any member of the public, including potentially affected parties, to submit on your proposal. If submission/s are received on your application, then you can expect a

hearing to be held. Information on [the notification process](#) and on the [likely costs](#) for notification and a hearing can be found on our website.

Please contact Mike Freeman via email ([mike.freeman@landpro.co.nz](mailto:mike.freeman@landpro.co.nz)) or phone (021-957563) if you have any questions.

Ngā mihi



**Tracey Gray**  
*Principal Consents Planner*

Copy to: Mike Freeman, Landpro  
Rob Sharp, Valmont Coatings  
Mike Massey, Environment Canterbury  
Madeline Sinha, Environment Canterbury  
Helen Rutter, Aqualinc

## ATTACHMENT 1

### Information Requested under Section 92 of the Resource Management Act 1991

**Application Number: CRC224350**

**Date: 27 July 2022**

Our preliminary technical review indicates that the identified groundwater quality degradation is both significant and unlikely to have been wholly caused by the historical event described within your application and the resultant passive discharge (for which this consent has been sought).

Additional information is sought to fully understand the proposal and to determine whether additional resource consents are required - which may need to be sought under RMA s91.

#### **1. Provide a robust conceptual site model**

The application does not include enough information about the processes occurring onsite to support the primary implicit conclusion (which appears to be based on the assessment of the potential for a leak from the galvanising tank) in the application that the observed degraded groundwater quality has been caused, or is being caused, by an historical event that is giving rise to a passive discharge.

We request a robust assessment that explains the extent of identified groundwater degradation, including the observed groundwater acid pH, high zinc concentrations and increased temperature. The assessment should:

- a) Describe all the on-site processes including an assessment of the integrity of all equipment that stores or transports contaminants where there is a potential for leakage. This should also clarify how any residual products such as sludge were and are currently managed and disposed of.
- b) Include a copy of the report "Stormwater Infrastructure Condition". This document is referred to in the e2Environmental report on the Underground Holding Tank Condition.
- c) Include a robustly developed conceptual site model consistent with the observed groundwater quality. This model must be based upon an assessment prepared by a suitably qualified and experienced groundwater scientist the likelihood that the observed groundwater quality could result from a passive discharge of the nature described within the application. For example, this may require some groundwater quality modelling of a point source discharge to assess the amounts of acid that would be needed to be discharged passively to result in for example, the significantly acidic (pH 3.5 – 3.75) groundwater observed in monitoring bores MW6 and MW9. Similarly, some additional assessment is needed to provide an explanation of the observed elevated groundwater temperature and high zinc concentrations in for example bore MW6, as well elevated zinc concentrations in MW3, MW4 and MW5. This should include consideration of groundwater flow direction.
- d) Update the relevant part of the assessment in the context of the [New Drinking Water Standards](#) which were very recently announced to come into effect in November 2022. Those include new MAVs for PFHxS + PFOS and PFOA. It would be appropriate to update the information provided in the application to consider the relevance of these pending standards as well as providing clarification of when the use of PFAS/PFOS stopped and what these compounds have been replaced with.
- e) Include a more detailed description of the wider groundwater environment based upon all the available groundwater quality data from bores in the wider area.

- f) Be based on follow-up groundwater quality monitoring to that undertaken of the bores tested in August 2021. We understand that the current galvanising process uses hydrochloric acid, while in the past sulphuric acid was used. Therefore, chloride and sulphate should be added to the list of monitored variables.

**2. Provide an explanation of how the conclusions about the direction of groundwater flow align with the published broader piezometric contours for the wider area**

The application concludes that groundwater flow in this location is northerly and notes that this is in contrast to the wider direction of groundwater flow.

We request an assessment of the apparent contradiction between groundwater flow direction at the site and the wider direction of groundwater flow. For example, is there some local physical infrastructure that is creating a localised disruption? As part of this it would be appropriate to review the original groundwater level data used to develop the reported local piezometric contours. It would be useful to plot the previously provided raw data up showing: those levels, how those data points have been interpreted to develop piezometric contours and how this meshes in with the wider groundwater flow characteristics.

**3. Provide a detailed description of the contaminants proposed to be discharged into groundwater to increase the pH of groundwater**

No specific substance(s) is/are proposed in the application to discharge to groundwater. The description of “pH tablets” “neutralising agent” “calcium carbonate or similar” does not adequately define the type or amounts of chemicals that are proposed to be discharged into groundwater.

We acknowledge that the conceptual approach arose during pre-application discussions with Environment canterbury staff. However, a more detailed specific proposal is needed. We therefore request a specific proposal to discharge contaminants into water and a specific assessment of the potential positive and adverse effects of that proposal. We understand that the goal of this proposed discharge would be to increase the pH of groundwater (particularly for groundwater in the vicinity of bores MW6 and MW9) and the likely consequential reduction of dissolved heavy metals. This should include a specific proposal to assess the effectiveness and effects of the proposed discharge and what information would be used to determine the success or otherwise of the proposal. The proposal could for example include an ‘adaptive management’ approach that identifies an appropriate monitoring and response process.

**4. Provide an assessment of the proposal against: (a) strategic policies 4.1, 4.3, and 4.7 as well as policies 4.23 and 4.25, of the Canterbury Land and Water Management Plan (CLWRP) and (b) Canterbury Regional Policy Statement (CRPS) objectives 7.2.1 and 7.2.3**

The applications do not include an assessment of these applicable policies and objectives.

We request an assessment of the proposal against the following specific objectives and policies:

- CLWRP policies 4.1, 4.3, 4.7, 4.23 and 4.25.
- CRPS objectives 7.2.1 and 7.2.3.

**5. Provide an assessment against Section 104G of the Resource Management Act**

The application does not include an assessment against Section 104G of the RMA. We appreciate that the application does include an assessment against the NESDW. However, for completeness there needs to be an assessment against Section 104G of the RMA.

We request an assessment of the applications against Section 104G of the RMA.

**6. Provide clarification on whether the discharge of stormwater from the site is currently authorised**

The Christchurch City Council (CCC) holds resource consent CRC214226 to discharge stormwater and entrained contaminants to land and water from properties in Christchurch.

It is acknowledged that significant work is currently being undertaken on site, in association with CCC, to ensure that the conditions of that resource consent are met and that the site is not excluded from coverage under that resource consent.

We request a detailed description of the nature of the stormwater generated on the site, and the extent of these discharges are authorised by CCC under resource consent CRC214226. For any discharge not specifically authorised by CCC, an assessment of the status of that discharge must be provided along with a statement as to whether a resource consent will be sought for any discharge that is not a permitted activity.

We understand, from a recent site visit, that there may be some small, unsealed areas on the site and/or areas where the concrete/surface may be cracked. Clarification is sought regarding the management of these.