

**From:** [Donovan Van Kekem](#)  
**To:** [Joe Harrison](#)  
**Subject:** RE: WMNZ Application CRC194083 - Further clarification  
**Date:** Friday, 25 October 2019 12:07:58 PM  
**Attachments:** [image004.jpg](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[CRC194083 WMNZ Hornby Waste Processing Facility - Air Quality Review - Final.pdf](#)

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Joe,

Thanks for providing this further information response from TnT. As discussed on the phone I have read through the response, and whilst it has provided some information which is useful for determining the potential for effects, not all of my concerns have been met.

I've attached the finalised review which was provided earlier in the processing of this consent for your reference.

Given the amount of to and fro associated with the process thus far, I expect that it would be of no benefit to request further information. I recommend that we progress onto the notification decision. It appears that both specialists agree that the Vic EPA separation distance of 500 m is applicable for the site. It appears that the applicant is approaching residents within this radius for the purposes of consultation.

My primary concerns relate to the applicant providing semi quantitative proof that the potential emissions of toxic compounds is minimal. I explained that a mass balance and chemical formulas would be helpful. From what I can see in the response they talk about processing batches of between 5 and 10 m<sup>3</sup>. It now appears that this will occur in a 'reaction tanks' as opposed to open pits, and that discharges to air will be 'vented to atmosphere' via the roof vents. I'd like to see some indicative design drawings for these 'reaction tanks' and associated ventilation scheme.

The mass of pesticide treatment on-site also does not propose to have a limit. I'm aware that the treatment facility will have a maximum processing capacity. I consider that a limit at this processing capacity be considered as a consent condition should it be granted. Furthermore, once again I'd like to see the chemical formulas which better describe the treatment processes for different pesticide solutions, such that it can be proven that under ideal conditions no gas is evolved from the process. Or if there is gas, that the relative mass emission rate of this gas (based on the maximum processing capacity of the processing plant) is low enough that the proposed carbon filter and discharge stack is sufficient control.

The proposed decanting of solvents appears to be a small scale operation with a low likelihood for off-site effects. However, I consider it would be appropriate to have some form of consent condition that limits the scale of this activity. The condition should be variable, i.e. limits of decanting operations of certain chemical classes shall be set in accordance with their toxicity.

The applicant has consented to having a consent condition that the main doors to the processing area remain closed except for the ingress and egress of trucks. This will help to reduce potential fugitive emissions from the processing area and ensure the any odour/emissions are discharged via the roof vents. Thus, reducing the potential for odour or toxic off-site concentrations.

With regard to dust emissions we have agreed that the proposed on-site controls are sufficient as most of the material remains damp during transfer and disturbance activities. Whilst this dust could contain toxic components, adequate controls will reduce the potential for off-site effects.

Overall, the applicant has provided a large amount of information in support of the application, this does not preclude the fact that the activity involves processing and handling a wide range of hazardous chemicals and mixtures. Some of these are very odorous. Whilst there are a range of controls proposed to minimise the emission of these toxic and odorous emissions, they will not be completely eliminated. There will be some residual emission. Given the proximity and sensitivity of the receiving environment, it is my opinion that the applicant will need to apply a very high level of control to potential emissions from the site. The activity needs to be limited to a manageable scale and size, such that the proposed controls will still be effective at the proposed scale. Redundancy measures for potential upset conditions are also recommended.

Regards,

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**From:** Joe Harrison <[Joe.Harrison@ecan.govt.nz](mailto:Joe.Harrison@ecan.govt.nz)>  
**Sent:** Monday, 21 October 2019 11:09 AM  
**To:** Donovan Van Kekem <[donovan@nzair.nz](mailto:donovan@nzair.nz)>  
**Subject:** FW: WMNZ Application CRC194083 - Further clarification

Hi

Updated info requested from our last meeting, be good to have a chat once you have read it over.

Joe

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**From:** Richard Chilton <[RChilton@tonkintaylor.co.nz](mailto:RChilton@tonkintaylor.co.nz)>  
**Sent:** Friday, 18 October 2019 4:05 PM  
**To:** Joe Harrison <[Joe.Harrison@ecan.govt.nz](mailto:Joe.Harrison@ecan.govt.nz)>  
**Cc:** [cberkett@wastemanagement.co.nz](mailto:cberkett@wastemanagement.co.nz)

**Subject:** WMNZ Application CRC194083 - Further clarification

Hi Joe,

Following from our meeting in September, please find a letter on behalf of WMNZ setting out further clarification on a number of matters in relation to the air discharge application (CRC1940843). Feel free to contact me to discuss this.

Regards

Richard

Nga Mihi | Kind regards,

**Richard Chilton | Senior Air Quality Scientist**

MSc(Hons), BSc, CAQP

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