



File No: WGN160337 [36387]
26 September 2019

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For: Neil Mora (email: neil.mora@resene.co.nz)

Dear Neil

Further information request under section 92(1) of the Resource Management Act 1991

Jeff Bluett from PDP and I have reviewed your application to change the conditions of Discharge Permit WGN160337 and the supporting information. However, we need further information on your application so that we can better understand the effects of this change, the effects on the environment and how any adverse effects on the environment might be mitigated.

Information requested

The information requested relates to specific sections of the assessment of effects on the environment, "*Resene Paints Ltd, Resource Consent Variation Application and Assessment of Effects on the Environment, Industrial Compliance Solutions Ltd, July 2019*". The information is required to assist PDP in confirming the conclusions of the applicant's assessment.

Section 2.2 Sensitivity of receiving environment

- 1. Reference is made to MfE's 2003 odour good practice guide (GPG). The current version of MfE's odour GPG is dated 2016. Please amend Table 2.1 and the assessment to reflect current guidance.*

Section 3.1.1 Ventilation System

- 2. Describe the processes within the Resene plant that produce PM₁₀ (Table 3.1)*
- 3. The plant is ventilated through both passive roof vents and through the discharge stack. Only the contaminants discharged from the stack have been assessed. It is unclear why the discharge from the roof vents have been excluded from the assessment. Please provide an explanation or amend the assessment to include the contaminants discharged from the roof vents.*

Section 3.2 Discharges to air

Table 3.2 defines the type and quantity of pollutants discharged.

4. We understand the contaminants listed in Table 3.2 were identified by emission testing.
 - a. Describe the emission test method and clarify if this was capable of identifying a wide range of VOCs.
 - b. Compare the contaminants listed in Table 3.2 to the contaminants identified in the MSDS for the paint components being used at the time of testing and either
 - i. Confirm all the potential contaminants are listed in Table 3.2.
 - ii. Expand Table 3.2 to include all the potential contaminants.
5. Given the variety of products manufactured by Resene, do the VOCs included in Table 3.2 cover all the contaminants potentially discharged from the plant? If not, please expand the assessment to include all contaminants discharged.
6. The 2018 and 2019 Air Emission Testing reports list the products being produced at the time of testing. However, no information is provided on the rate of production. Please detail the production rate at the time of emission testing for the results presented in Table 3.2.
7. Compare the production at the time of testing with typical and maximum production levels. Provide a production rate context for the assessment provided.
8. The application states that the variance in VOC emission rates is likely a result of increased plant temperatures. Please provide:
 - a. The plant temperatures during each emission test
 - b. The peak temperature likely to be experienced by the plant
 - c. An analysis of the likelihood of higher temperatures occurring within the plant causing emission rates above those assessed; and
 - d. If necessary, an amended assessment of effects based on maximum likely VOC emission rates.
9. Provide a copy of the 2018 and 2019 Source Testing New Zealand reports including the stack emission test results, airflow velocity and temperature in the stack;
10. Provide the calculation sheet used to derive the final emission rates given in Table 3.2.
11. Table 4.5 lists the temperature of discharge gas as 16°C. Text in Section 3.2 defines the temperature of discharge gas as 39.7°C. Please clarify which is correct and what value was used in the modelling.

Section 4.2. Air quality assessment criteria

12. The California Office of Environmental Hazard Assessment (OEHHA) chronic inhalation Reference Exposure Levels (REL) for toluene is 300µg/m³; significantly lower than the US EPA RfC value of 5000µg/m³ provided in Table 4-2. Please review the OEHHA RELs and integrate these into the criteria where appropriate. Or where a higher value has been chosen from the available assessment criteria provide a brief explanation on why this specific assessment criteria is appropriate for this assessment.

Section 4.3 Dispersion Modelling

13. A 50m modelling grid seems quite coarse considering the proximity of near sensitive receptors. Either:
 - a. Provide justification for this grid resolution; or

- b. Provide MGLC results from a finer grid (e.g. 25m), to confirm the model resolution is sufficient for identifying potential offsite effects.*
- 14. Provide a copy of the Calpuff input and output files.*

Section 5.2.4 Discussion of potential for odour effects

The assessment concludes that the effects of odour from the site are considered negligible. However, GWRC have received more than 20 odour complaints in the vicinity of the Resene plant over the period 1 January 2016 to 04 April 2019. The sources/causes of many of the odour complaints have not been identified. The complaints record is available from GWRC. NCI operate a meteorological station approximately 300 m east of the Resene plant. NCI have indicated that they are willing to make the meteorological data available to Resene for the purpose of this assessment. Please contact Rhys Kevern on (0)9 9149447 ext 847 or email rhys.kevern@ncipackaging.com.

- 15. For each complaint assess whether:*
 - a. Resene was downwind of the complaint location at the time of the complaint.*
 - b. Resene was operating at the time of the complaint.*
 - c. The nature of the odour matches that of VOCs discharged from Resene.*
- 16. Use the findings of the odour complaint analysis to support the conclusions reached in the assessment.*

Section 5 Assessment of quality effects

Section 2.5 of the AEE notes there are several neighbouring businesses which have the potential to generate odour. There are also businesses that undertake spray painting and printing which discharge VOCs within 300 m of the Resene site. Given the nature of the receiving environment background concentrations of PM₁₀ are likely to be elevated during the cooler months of the year.

- 17. To address the issues noted above, provide an assessment of cumulative effects (Resene discharges plus background) for:*
 - a. PM₁₀*
 - b. Odour (this assessment could be linked to the answers of questions 16 and 17)*
 - c. VOCs.*

Date information required

Please provide the above information to me by 17 October 2019. If you are not able to supply the information requested¹ by this date, you must let us know in writing within this timeframe, either that you require additional time (at which time we will set a reasonable timeframe for you to provide the information) or that you refuse to provide the requested information.

Public notification of application if further information not provided

If you refuse to provide the information requested, or if you do not supply all the information by the due date of 17 October 2019, we are required to publicly notify your application² and to continue

¹ Under section 92A of the Resource Management Act 1991

² Under section 95C(1) of the Resource Management Act 1991. An application fee of \$8,800 (Excl. GST) is required in order to process a notified application. The statutory clock will remain stopped until this additional fee is paid.

processing without the information requested³. All costs associated with the notification and processing of your application will be on-charged to you⁴.

Processing of your application

Your application is currently on hold, and the statutory 'clock'⁵ stopped while the technical peer review of your application is undertaken. This letter presents the outcome of Stage 1 of the review - Provision of advice on completeness and further information required.

Please feel free to contact me on 021 922712 if you have any questions or concerns.

Yours sincerely



Michelle Conland
Resource Management Consultant
for Environmental Regulation
Greater Wellington Regional Council

³ Under section 92A(3) of the Resource Management Act 1991

⁴ Under section 36 of the Resource Management Act 1991

⁵ Under section 88C of the Resource Management Act 1991