

**From:** [Andrew Rumsby](#)  
**To:** [Biance Schoeman](#)  
**Subject:** RESPONSE TO SECTION 92 REQUESTS FROM WAIKATO REGIONAL COUNCIL- APP141283  
**Date:** Tuesday, 14 January 2020 11:54:55 AM

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Hi Biance,

Please find below PDP responses to Waikato Regional Council Section 92 request dated 18 December 2019 related to proposed managed fill at 300 Riverview Road, Huntly.

## 1.0 Managed Fill AEE

### 1.1 Requiring Corrections:

1. Footnote 7 of Table 5 correction to waste acceptance criteria of lead (300 mg/kg to 250 mg/kg) and nickel (105 to 65 mg/kg).
2. Footnote 6 of Table 7.

These corrections have been made in the Huntly Managed Fill – Assessment of Environmental Effects and Waste Acceptance Criteria Report (PDP, 2019).

Table 7 has also been updated to remove 95% column and replace it with proposed weighted rolling monthly mean concentrations.

### 1.2 Further Information Required

1. Please provide more clarification regarding TPH and TBT waste acceptance criteria.

Huntly Managed Fill – Assessment of Environmental Effects and Waste Acceptance Criteria Report (PDP, 2019) has been updated, and Table 5 footnotes have been updated to remove confusion.

2. Please provide some further discussion on the exclusion of boron and thallium from the predicted groundwater discharge assessment as presented in Table 6.

Boron cannot be modelled in RCBA. Therefore, the maximum Auckland background concentration outlined in TP153 was used as the waste acceptance criteria. This value is typically used in Auckland Managed Fills, and surface water monitoring has not detected any changes in boron concentrations in nearby streams.

Initially, thallium was modelled using RCBA software but not reported as there are no high-reliability water quality guidelines for thallium. However, modelling with RCBA software predicted surface water concentrations in the Waikato River to increase by  $2.6e^{-10}$ . This is significantly lower than the published ANZ low-reliability guideline value of 0.000 03mg/L. Due to the conservatism in the low-reliability guideline value, the discharge is not expected to cause an adverse effect on aquatic life. Table 6 of the Huntly Managed Fill – Assessment of Environmental Effects and Waste Acceptance Criteria Report (PDP, 2019) has been updated with a thallium value to reflect this.

3. What is the purpose of the third column in table 7, entitled 95% average?

This table has been updated (see Section 1.1).

4. Please provide clarification of Section 14 of the Radiation Protection Regulations 1982 with regards to what material could be acceptable for disposal.

Section 7.2 of the Huntly Managed Fill – Assessment of Environmental Effects and Waste Acceptance Criteria Report (PDP, 2019) prohibits the acceptance of radioactive waste into the landfill. Section 14 and the reference to radioactive waste has been deleted.

## **2.0 Limitations**

This report has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by Paua Planning and Gleeson Cox. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the report. PDP accepts no

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