



## WRC S92 REQUEST & RESPONSES –

### Gleeson Managed Fill Limited Resource Consent Application (APP141283)

<b>Council:</b>	Waikato Regional Council	<b>Application</b>	Gleeson Managed Fill Limited APP141283
<b>Request</b>	S 92 Request – Request for Further Information	<b>Date Received</b>	18 December 2019
<b>Information submitted to WRC: 23 January 2020</b>			

Request for information	s92 Response	Close Out (Y/N) Comment
<b>Air Quality AEE WRC REVIEWER Jonathon Caldwell – Information provided by PDP (Deborah Ryan)</b>		
<p>1 Please provide comment on the applicability of meteorological data from the four air quality monitoring stations operated by Genesis Energy for the Huntly Power Station that are located in much closer proximity to the Gleeson Quarry compared with the Ruakura and Whatawhata stations.</p> <p>The wind roses from the four monitoring sites and specifically the two sites around the Huntly airshed indicate in addition to the prevailing westerly direction additional secondary prevailing wind directions from southeast and north.</p>	<p>We have reviewed the metrological data shown as windroses in the <i>Huntly Power Station 2017-2018 Annual Compliance Monitoring Report</i>. We note that three of the four of the sites have short masts (less than 10 metres) or are obstructed. The Frost Road site has a 10 metre mast and is located around 9 km to the north of the quarry. Similar to the Gleeson Quarry site, the Frost Road meteorological station is located in the Waikato River Valley, which has the effect of channelling the winds in a predominantly north-south axis, in contrast to the predominant westerlies observed at Ruakura and Whatawhata stations. We would expect the predominant winds at the Gleeson Quarry site to be similar to what is observed at the Frost Road meteorological station.</p> <p>Regarding the assessment of effects, the strong winds from the southwest would be of most concern, due to the proximity of the receptors at the north-eastern boundary of the site. However, we note that these residences are over 400 metres distant from the proposed dust-generating activities at the quarry, and so are unlikely to be significantly affected by dust, even when downwind of the activities.</p>	Y
<p>2 Please clarify whether the caption for Figure 6 is incorrect as it refers to dry surface days data for</p>	<p>This caption is incorrect – the data is from the Ruakura weather station.</p>	Y



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Tauranga Airport?		
<p>3 Please provide some further clarification around the FIDOL assessment of Offensiveness with respect to the assessment that the fill material will be principally of inert inorganic material.</p> <p>It is noted that managed fill could contain quite elevated concentrations of contaminants that could be harmful to human health e.g. arsenic at up to 100 mg/kg and lead at up to 1000 mg/kg. While it is acknowledged that average concentrations over the longer term are going to be a lot lower than this, there is potential for elevated concentrations in dust in the short term after a specific load has been deposited. This section of the FIDOL assessment also refers to asbestos being enclosed in impermeable packaging material which will prevent emissions of ACM to air. However, this doesn't account for disposal of soils containing asbestos fibres which typically won't be wrapped, although will be covered during transport. So there is potential for discharges of asbestos fibres from unwrapped soils as they are being tipped if not managed properly.</p> <p>Therefore, there is in my opinion, potential for offensiveness from dust discharges from soils with</p>	<p>Managed fill could contain elevated concentrations of contaminants that could be harmful to human health based on the proposed waste acceptance criteria for the managed fill. Average contaminant concentrations in the fill materials will be significantly lower than the acceptance criteria, however, there is potential for elevated concentrations in dust in the short term from depositing of individual contaminated loads.</p> <p>Similarly, the acceptance of ACM fill has the potential to result in dust if poorly managed e.g. if the ACM is not appropriately wrapped and/or covered.</p> <p>These discharges will be mitigated by the industry good practice dust management measures as described in the air quality technical report and adherence to the proposed controls identified in the Asbestos Fill Management Plan and Dust Management Plan.</p>	Y



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<p>high levels of metals and soils containing asbestos fibres if poorly managed, but that this factor should be able to be mitigated through good dust control consistent with Industry best practice as set out in section 7 and adherence to the proposed controls identified in the Asbestos Management Plan.</p>		
<p>4 Please provide some further discussion on the proposed mitigation of avoiding earthworks activities during periods of strong winds (&gt;10 m/s as a 10 minute average)</p> <p>For example, would it be necessary to cease works if the wind is blowing away from sensitive receptors or if the wind is blowing towards sensitive receptors but the earthworks are being undertaken on the western boundary of Fill sites 2 or 3 where separation distances might be in the region of 800 to 1000 metres? Or should there be a lower wind speed alert if asbestos waste or soils with asbestos fibres is being deposited?</p> <p>Installation of an onsite wind monitoring sensor would also provide a more localised and accurate determination of wind conditions on site compared with reliance on wind data obtained from an offsite meteorological station.</p>	<p>We agree that a limitation on the operation ceasing when winds exceed 10 m/s could be applied so that earthworks cease when strong winds are from the west and south-southwest, and that this restriction also be limited to Fill Areas 4 and 5 as being nearest the sensitive receptors to the east and north-northeast. Application of controls within these parameters will provide sufficient mitigation of the potential effects.</p> <p>The separation distance of the dust-generating activities proposed at the site is sufficient that significant offsite effects are unlikely during periods of winds less than 10 m/s for all soils and associated contaminants, especially given the other proposed mitigations.</p> <p>We agree that installation of an on-site meteorological station, with capability for issuing text alerts at higher wind speeds, is good practice for managing the effects of wind-blown dust.</p>	Y