

ERRATUM No.1

Hearing Block 10

Topic 13: Resource Quality - Air

To: The Chair and Panel, and submitters

From: David Jackson, Reporting Officer

Date: 29 October 2018

I wish to make the following corrections to my officer's report (dated 4 October 2018):
Resource Quality – Air as attached:

Dominions Salt Limited submission 355.15

I wrongly attributed submission point 355.15 at paragraph 300 of my section 42A report, to the prohibited activity rule 22.6.1, when it in fact relates to controlled activity rule 22.4.1.

I correctly assess the submission below, and then make consequential amendments to my section 42A report at paragraph 300, and the Recommended Decisions Table in Appendix 1 of that report.

There are two related minor corrections arising, which I also address below.

ADDITION:

To correct the error in relation to 355.15, the following needs to be added under Matter 16 – External Combustion (at page 118 of my report):

Matter 16 – External Combustion – Lake Grassmere Salt Works Zone

Controlled Activities 22.4.1 (external combustion) - Submissions and Assessment

1. Rule 22.4.1 is:

22.4.1 *Any discharge of contaminants to air from water blasting and from dry abrasive blasting, other than from the use of a moveable source. Discharge of contaminants to air, of the products of combustion from fuel burning equipment used for generating heat or electric power using:*

- (a)** *untreated wood, coal or oil, except waste oil, for the purposes of generating heat or electric power at a rate not exceeding 10MW;*
- (b)** *methane or natural or liquefied petroleum gas for the purposes of generating heat or electric power at a rate not exceeding 50MW;*

where the limits specified in (a) or (b) above apply to the cumulative generated heat or electric power produced by the specified fuel within the same premises.

Standards and terms:

- 22.4.1.1** *The discharge must be from a chimney.*
- 22.4.1.2** *The chimney must be designed so that the minimum efflux velocity is 20m/s at the chimney exit at full load for sources less than 10MW capacity, and 15m/s for sources equal to or greater than 10MW capacity.*
- 22.4.1.3** *The chimney must be designed so that the discharge is vertically upwards and unimpeded by cowls or any other fixtures on the top of the stack coning may be used to increase the velocity discharge.*
- 22.4.1.4** *The chimney height must comply with the requirements of Appendix 8 – Schedule 5.*

Matters over which the Council has reserved control:

- 22.4.1.5** *The location of the point of discharge.*
- 22.4.1.6** *The carrying out of measurements, samples, analyses, surveys, investigations or inspections.*
- 22.4.1.7** *The provision of information to the Council at specified times.*
- 22.4.1.8** *Compliance with monitoring, sampling and analysis conditions at the consent holder's expense.*

2. **Dominion Salt Ltd** (355.15) opposes rule 22.4.1. They want the rule deleted, including the standards and matters of control, saying these are largely existing activities which have no effect beyond the site.

Assessment

3. There are four zones which have rule regulating the discharge to air of contaminants from external combustion (boilers etc). These are the Industrial 1 & 2 Zone, the Port Zone, the Lake Grassmere Saltworks Zone and the Airport Zone. The Lake Grassmere Saltworks Zone is the only one with a controlled activity rule.
4. I support the Dominion Salt submission to remove rule 22.4.1 as it would provide a more consistent approach across the Plan for all discharges, while still ensuring the environmental effects of discharges to air are appropriately managed.

Recommendation

5. I recommend that rule 22.4.1, including its standards and terms (22.4.1.1 to 4) and its matters of control (22.4.1.5 to 8) are deleted in their entirety.¹

CONSEQUENTIAL AMENDMENT:

6. That paragraph 300 from my section 42A report dated 4 October be deleted, as follows:

~~300 — Dominion Salt Ltd (355.15) opposes the rule in the Lake Grassmere Saltworks Zone. They submit that the activities covered by the rule are largely existing activities which have no effects beyond the site. They seek deletion of rule 22.4.1.~~

7. That my recommended decision for Dominion Salt Ltd 355.15 in Appendix 1 on page 134, of my report be changed from 'Accept in Part' to 'Accept', as follows:

355	15	Dominion Salt Limited	Volume 2	22 Lake Grassmere Saltworks Zone	22.4.1.	Accept in-part
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OTHER CORRECTIONS:

8. At paragraph 726 of my section 42A report I reproduce a generic permitted activity standard for discharge to air from external combustion, to represent the standards applying the Industrial, Port, Lake Grassmere Saltworks and Airport zones.
9. The first standard is:

Discharge of contaminants to air from the combustion of fuel (i.e. external combustion).

X.3.X.1 The discharge must not contain more than the following maximum heat output limits:

- 10MW for natural or liquefied petroleum gas;*
- 40kW for untreated wood;*
- 100kW for coal;*
- 40kW for light fuel oil;*
- 1.0MW for pellet fuel when burnt in a custom designed pellet boiler;*
- 400kW for pellet fuel when burnt in a standard boiler converted for pellet fuel use;*
- 10MW for diesel;*
- 2MW for kerosene.*

¹ 355.15 – Dominion Salt

10. The level in (c) of 100kW is correct for the Industrial, Port and Airport Zones, but for the Lake Grassmere Zone it is **200kW**.

A) Recommended Action:

11. In any redrafting of the external combustion rules, care is taken to retain the figure of 200kW for coal in rule 22.3.12.1(c) in the Lake Grassmere Saltworks Zone, and 100kW in the Industrial, Port and Airport Zones (there being no submissions to change these levels).

B) Consequential Amendment:

12. In paragraph 739 of my section 45A report, in relation to the NZDF submission on the Airport Zone, I refer to a threshold of 200kW for coal (instead of 100kW which applies to coal in the Airport Zone). The figure used makes no difference to my argument, but it should be amended to reflect the correct permitted threshold for coal applying in the Airport Zone, as follows:

739 *NZDF asks why the limit for light fuel oil, for example, is so low compared to other fuels with comparable effects. I agree that the threshold for light fuel oil is very low (40kW compared to **2100kW** for coal). Light fuel oil is a much 'cleaner' fuel than coal and I would expect a higher energy threshold would be permitted than coal. The same applies for untreated wood. I support increasing the thresholds for wood and light fuel oil to 200kW. This is the same as for coal. I would favour lowering the limit for coal as I consider **2100kW** is rather high for such a fuel as a permitted activity, but there is no submission to allow this.*