

Annual Air Quality Report Blenheim

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Annual Air Quality Monitoring Report- Blenheim 2020

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Executive Summary

The main air pollutant of concern in urban areas of New Zealand is particulate. The main measures of particulate are PM_{10} (particles less than 10 microns in diameter) and $PM_{2.5}$ (particles less than 2.5 microns in diameter). Both size fractions were measured at the Redwoodtown monitoring site during 2020. Historically monitoring for PM_{10} had also been carried out at Middle Renwick Road (MRR). This monitoring ceased in 2019. The main source of particulate in Blenheim during the winter is solid fuel burning for domestic home heating.

Monitoring data for PM_{10} were compared to the National Environmental Standard for Air Quality (NES) of 50 μg m⁻³ (24-hour average), the proposed NES for $PM_{2.5}$ (annual and 24-hour averages) and to the Ministry for the Environment's air quality guidelines and indicator categories. Comparisons are made with historical data to determine the likelihood of trends in concentrations.

Concentrations of PM_{10} exceeded 50 $\mu g/m^3$ in Blenheim on three occasions during 2020 resulting in two breaches of the NES for PM_{10} (the NES allows for one exceedance per year). In 2019 there were no breaches of the NES in Blenheim and in 2018 the NES was breached on six occasions. The maximum measured concentration during 2020 was 66 $\mu g/m^3$ and compares with a 2019 maximum concentration of 57 μg m⁻³. The annual average PM_{10} concentrations for 2020 was 18 $\mu g/m^3$ and compares with a guideline value of 20 $\mu g/m^3$.

Concentrations of $PM_{2.5}$ exceeded 25 $\mu g/m^3$ (24-hour average proposed NES) on 45 occasions. The maximum measured $PM_{2.5}$ concentration was 56 $\mu g/m^3$ and is more than double the proposed NES for $PM_{2.5}$. The annual average $PM_{2.5}$ concentration was 11.8 $\mu g/m^3$ and is around 20% higher than the proposed NES for $PM_{2.5}$ of 10 $\mu g/m^3$.

Management measures to reduce PM_{10} concentrations to meet the NES have been included in the Proposed Marlborough Environment Plan (notified June 2016). Measures are based on a 2012 assessment which predicted concentrations would reduce from 2012–2018 in the absence of regulation. Potential reasons for the reductions not occurring include higher than anticipated emissions from newer burners and underestimated population increase in the airshed area from 2006-2013. Further evaluation of the effectiveness of the management options given the downward trend did not occur suggests that additional measures, for example targeting the operation of burners, would likely be required to achieve the NES for PM_{10} . If the 24-hour average proposed NES for $PM_{2.5}$ were introduced, significant reductions in daily winter $PM_{2.5}$ concentrations would be required to be compliant and consequent air quality management required to meet this target would be likely be significant.

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1. Introduction

The main air contaminant of concern in Blenheim and other urban areas of New Zealand is particulate or particles in the air. The main indicator of particulate used has been PM₁₀, particles in the air less than 10 microns in diameter and this size fraction forms the basis of the National Environmental Standard (NES). For the past decade, however, the scientific community has been of the view that the smaller of these particles, those less than 2.5 microns in diameter are a stronger indicator of health impacts.

Table 1.1 shows the contaminant, the concentration, averaging period and allowable exceedances as required by the NES (Ministry for Environment, 2004). The NES for PM_{10} is set at 50 μ g m⁻³ with one allowable exceedence per 12-month period. Compliance with this target was required by September 2016 in Blenheim. This has not been achieved. All other areas in Marlborough must remain compliant with the NES.

In 2020 the Ministry for the Environment proposed revisions to the NES for particulate, with the addition of an annual average $PM_{2.5}$ of 10 μ g/m³ and a daily average $PM_{2.5}$ NES of 25 μ g/m³. The existing NES for PM_{10} (24-hour) is proposed to be retained. This signals the need for $PM_{2.5}$ monitoring in addition to PM_{10} monitoring. Monitoring of $PM_{2.5}$ has been carried out in Blenheim since 2017. The proposed NES values for $PM_{2.5}$ are used for the reporting values for $PM_{2.5}$ concentrations in this report.

It is also noted that nationwide lockdowns during the months March to May 2020 may have impacted on a number of emission sources. In particular, reduced vehicles on the roads during these months will have reduced vehicle emissions, some industry may have not discharged to air and increased dwelling occupation may have resulted in more daytime burning of fuel for home heating. This report does not attempt to quantify any impacts of COVID 19 on air quality but notes that changes in emissions sources during these months are likely to have occurred.

This report summarises concentrations of PM₁₀ and PM_{2.5} that were measured in Blenheim during 2020.

Air quality monitoring in the Marlborough Region includes monitoring of PM_{10} at the MRR monitoring site from 2000 to 2018, intermittent monitoring of PM_{10} at the Redwoodtown Bowling Club site, survey PM_{10} monitoring in Renwick during 2000 and 2002, monitoring for PM_{10} in Picton during 2008 and 2009, visibility surveys and passive sampling for nitrogen oxides and sulphur oxides. From 2007 to early 2008, PM_{10} concentrations were measured at the Croquet Club in Redwoodtown in addition to the main monitoring site at the Bowling Club. A site on Brooklyn Street in Redwoodtown was temporarily used to measure PM_{10} concentrations during 2004.

Air quality monitoring data in other urban areas of New Zealand indicates that it would seem unlikely that concentrations of NES contaminants other than particulate would be in breach in Blenheim. Concentrations of other contaminants even in large urban areas are typically within the NES and guideline concentrations. Because emissions of other contaminants in Blenheim are far lower than large urban areas such as Christchurch, it would seem unlikely that concentrations of other key urban air pollutants would be in breach of the NES or air quality guidelines. The exception to this may be benzo(a)pyrene concentrations, which appear to occur well in excess of guideline concentrations in Christchurch.

The Ministry for the Environment also provides guidelines for ambient air quality (Ministry for Environment, 2002). Table 1.2 shows the ambient air quality guidelines and Table 1.3 details the air quality indicator categories to assist in the presentation and management of air quality in New Zealand. Air quality monitoring data in this report are presented relative to air quality guidelines and these indicator categories. These categories provide a useful perspective on the overall air quality and provide a valuable tool for evaluating trends in concentrations over time.

Table 1.1: National Environmental Standards for Ambient Air Quality (MfE, 2004)

Contaminant	NES values											
	Concentration	Averaging Period	Allowable exceedences / year									
Particles (PM ₁₀)	50 μg m-3	24-hour	1									
Nitrogen dioxide	200 μg m-3	1-hour	9									
Sulphur dioxide	350 μg m-3	1-hour	9									
Sulphur dioxide	570 μg m-3	1-hour	0									
Ozone	150 μg m-3	1-hour	0									

Table 1.2: Ambient air quality guidelines for New Zealand (MfE, 2002)

Octobridge	2002 guideline values								
Contaminant	Concentration	Averaging Period							
Carbon monoxide	30 mg m-3 10 mg m-3	1-hour 8-hour							
Particles (PM ₁₀)	50 μg m-3 20 μg m-3	24-hour Annual							
Nitrogen dioxide	200 μg m-3 100 μg m-3	1-hour 24-hour							
Sulphur dioxide ^b	350 µg m-3 120 µg m-3	1-hour 24-hour							
Ozone	150 µg m-3 100 µg m-3	1-hour 8-hour							
Hydrogen sulphide ^c	7 μg m-3	1-hour							
Lead d	0.2 μg m-3 (lead content of PM10)	3-month moving, calculated monthly							
Benzene (year 2002)	10 μg m-3	Annual							
Benzene (year 2010)	3.6 µg m-3	Annual							
1,3-Butadiene	2.4 μg m-3	Annual							
Formaldehyde	100 µg m-3	30-minutes							
Acetaldehyde	30 μg m-3	Annual							
Benzo(a)pyrene	0.0003 μg m-3	Annual							
Mercury (inorganic) d	0.33 μg m-3	Annual							
Mercury (organic)	0.13 μg m-3	Annual							
Chromium VI ^d	0.0011 μg m-3	Annual							
Chromium metal and chromium III	0.11 μg m-3	Annual							
Arsenic (inorganic) d	0.0055 μg m-3	Annual							
Arsine	0.055 μg m-3	Annual							

Notes for Table 1.2:

- ^a All values apply to the gas measured at standard conditions of temperature (0° C) and pressure (1 atmosphere).
- The sulphur dioxide guideline values do not apply to sulphur acid mist.
- ^c The hydrogen sulphide value is based on odour nuisance and may be unsuitable for use in geothermal areas.
- The guideline values for metals are for inhalation exposure only; they do not include exposure from other routes such as ingestion. These other routes should be considered in assessments where appropriate.

Table 1.3: Environmental Performance Indicator categories for air quality (MfE, 2002)

Category	Value relative to guideline	Comment
Excellent	Less than 10% of the guideline	Of little concern: if maximum values are less than a tenth of the guideline, average values are likely to be much less
Good	Between 10% and 33% of the guideline	Peak measurements in this range are unlikely to affect air quality
Acceptable	Between 33% and 66% of the guideline	A broad category, where maximum values might be of concern in some sensitive locations but generally they are at a level which does not warrant urgent action
Alert	Between 66% and 100% of the guideline	This is a warning level, which can lead to exceedences if trends are not curbed
Action	More than 100% of the guideline	Exceedences of the guideline are a cause for concern and warrant action, particularly if they occur on a regular basis

An emission inventory for Blenheim was updated in 2017 to provide a more recent estimate of the sources of PM_{10} and other contaminant emissions (Wilton, 2017). The results of the inventory indicated that domestic home heating was the main source of PM_{10} emissions, contributing to around 90% of the daily wintertime PM_{10} . Motor vehicles contributed to 1% of PM_{10} emissions, outdoor burning contributed to 8% and industry contributed to 1% of total wintertime emissions.

2. Methodology

Air quality monitoring of particulate in Blenheim during 2020 was carried out at the Redwoodtown Bowling Club site in Blenheim. Two 5014i beta attenuation monitors (BAM) were used to measure PM_{10} and $PM_{2.5}$.

Prior to 2016, meteorological data, including wind speed, wind direction were obtained from a NIWA site on the outskirts of Blenheim. Ambient temperature data was collected at the Bowling Club site in Redwoodtown. All meteorological data (wind speed, temperature and wind direction) are now monitored at the Redwoodtown monitoring site.

2.1. Air quality monitoring sites

Figure 2.1 shows the Redwoodtown Bowling Club site which has been operational since 2002, the NIWA metrological monitoring site, which was used for meteorological data prior to 2016 and the MRR site, which was discontinued in 2019 and provides a historical record of PM_{10} in Blenheim.

In 2007 a site at the Croquet Club was established for the purposes of evaluating the relationship between Brooklyn Street area PM_{10} and PM_{10} concentrations measured at the Bowling Club. This was considered important because PM_{10} concentrations of the magnitude measured during 2004 at Brooklyn Street had not been measured at the Bowling Club and because the reductions required in PM_{10} concentrations in Blenheim had been dependent on the Brooklyn Street results. The results from work undertaken in 2007 and reported in the '2007 Air Quality Monitoring Report' (Wilton, 2008) indicated that the Brooklyn Street site was likely to be affected by localised sources of PM_{10} and should not be used for air quality management purposes. Details of the Croquet Club site are outlined in '2008 Air Quality Monitoring Report' (Wilton & Baynes, 2009).



Figure 2.1: Location of air quality sites and NIWA metrological site in Blenheim

2.1.1. Redwoodtown monitoring site

In 2010 air quality monitoring took place at the main air quality monitoring site at the Blenheim Bowling Club on Weld Street in Redwoodtown. Figures 2.2 and 2.3 show the surrounding area and the location of the monitoring site within the Bowling Club grounds. Summary site details are given in Table 2.1.



Figure 2.2: Aerial photo of the Redwoodtown air quality monitoring site (note: blue arrow depicts monitoring site).



Figure 2.3: PM_{10} monitor at the Redwoodtown – Bowling Club air quality monitoring site.

Table 2.1: Site summary details for the Redwoodtown – Bowling Club air quality monitoring site.

Site name	Redwoodtown – Bowling Club
Site contact details	Marlborough District Council
Description of site	The site is located at the Blenheim Bowling Club, which is to the south-east of central Blenheim. The surrounding area includes a bowling green, gravel petanque area and paved areas.
Site category	Residential neighbourhood
Purpose of site and sources	To measure worst-case ambient air concentrations of PM_{10} in Blenheim. The main source during the winter months is solid fuel burning for domestic heating. The site is downwind of a large residential area for meteorological conditions conducive to poor air quality.
Proposed duration of monitoring	Ongoing
Contaminants monitored	PM ₁₀
Site co-ordinates	E1679764 N5402328
Date of site installation	Monitoring from 2000-2003. Permanent site since 2005.
Meteorological characteristics of area	Low wind speeds occur regularly during the winter months. Temperature inversions are likely.
Sample frequency	Continuous
Inlet height	3.5 metres
Averaging period	24-hour and hourly

2.2. Quality assurance

Operation of the BAM is carried out by Marlborough District Council (MDC) staff. Ten minute data is recorded by the instrument and logged by an iQuest iRIS 350 datalogger. The BAM filter spot is moved on every eight hours. Results are telemetered hourly to MDC and stored in the hilltop database. Annual calibrations are carried out by Lear Siegler.

3. Air quality monitoring in Blenheim

3.1. PM₁₀ concentrations

During 2020 there were three exceedences of 50 $\mu g/m^3$ at the Redwoodtown air quality monitoring site (Figure 3.1). The NES allows one exceedence of 50 μg m⁻³ per year before a breach occurs. The NES was therefore breached on two occasions in Blenheim during 2020. In 2019 there were no breaches and in 2018 the NES was breached on six occasions.

The maximum PM_{10} concentration for 2020 was 66 $\mu g/m^3$ and was measured on 2 July.

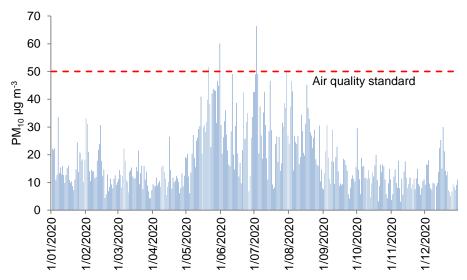


Figure 3.1: 24-hour average PM_{10} concentrations measured at the Redwoodtown – Bowling Club site during 2020.

Daily PM_{10} concentrations measured from 2006 to 2020 relative to the MfE air quality indicator categories (shown in Table 1.3) are illustrated in Figure 3.2. Similarly, monthly variations in the distribution of PM_{10} concentrations for 2020 are shown in Figure 3.3. The distribution of PM_{10} concentrations by season are similar to other years with the winter months showing the greatest proportion of days in the "acceptable", "alert" and "action" categories and fewer days in the "good" category.

Figure 3.4 compares the number of days when $50 \, \mu g/m^3$ was exceeded in 2020 to previous years along with the maximum concentration and the second highest concentration. It is important to note, that comparisons between years does not take into account year to year variations in the impact of meteorology. This issue is examined further in section 4 of this report.

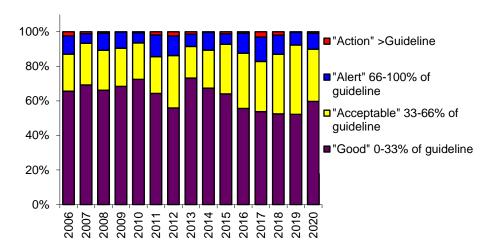


Figure 3.2: Comparison of PM_{10} concentrations measured at Redwoodtown from 2006 to 2020 to air quality indicator categories.

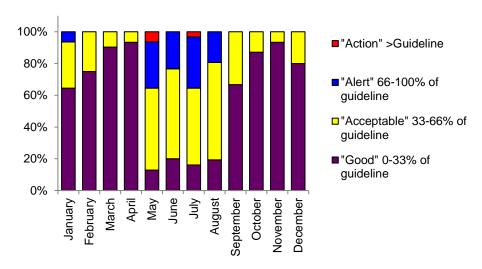
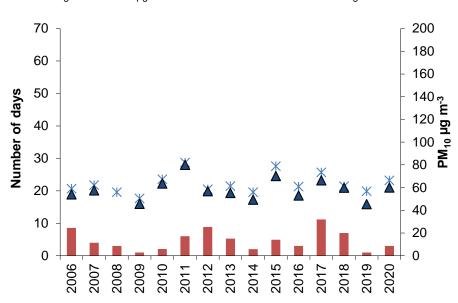


Figure 3.3: Comparison of daily PM_{10} concentrations each month during 2020 to air quality indicator categories.



■Number greater than 50 µg m-3 × Maximum concentration ▲ Second highest concentration

Figure 3.4: Number of days when 50 μg m⁻³ was exceeded, the maximum concentration and the second highest concentration from 2006 to 2020.

The annual average PM_{10} concentration for 2020 was 18 μ g m⁻³. This is the same as for 2019 and is at the upper end of the normal range for this monitoring site (14-19 μ g/m³). The Ministry for the Environment specifies an annual average guideline for PM_{10} of 20 μ g m⁻³. The NES does not currently include an annual average concentration for PM_{10} although this currently being reviewed as part of the proposed revisions to the NES.

Summary statistics for PM_{10} monitoring results from the Redwoodtown Bowling Club site from 2002 to 2020 are provided in Table 3.1. Data from 2016 has been adjusted for gravimetric equivalency. From 2005 monitoring was conducted from January to December and in 2004 air quality monitoring took place at a site in Brooklyn Street.

Table 3.1: Summary of PM₁₀ concentrations measured at Redwoodtown from 2002-2020

	2002	2003	2004	2005	2006*	2007*	2008*	2009*	2010*	2011*	2012*	2013*	2014*	2015*	2016	2017	2018	2019	2020
Monitoring method	Hi-vol	Hi-vol	Hi-vol	Hi-vol	BAM	BAM	BAM	BAM	BAM	BAM	BAM/Hi- vol	BAM	BAM/Hi- vol	BAM/Hi- vol	BAM	BAM	BAM	BAM	BAM
"Good" 0-33% of guideline	18%	22%	46%	63%	66%	69%	66%	68%	72%	64%	56%	72%	67%	64%	56%	54%	53%	52%	60%
"Acceptable" 33-66% of guideline	62%	30%	22%	17%	21%	24%	23%	22%	21%	21%	31%	18%	22%	29%	32%	29%	34%	40%	30%
"Alert" 66-100% of guideline	10%	26%	20%	17%	10%	6%	10%	9%	6%	13%	11%	7%	10%	6%	12%	14%	11%	7%	9%
"Action" >Guideline	10%	22%	12%	3%	3%	1%	1%	0%	1%	2%	2%	1%	0%	1%	1%	3%	2%	0%	1%
Percentage of valid data	14%	7%	22%	32%	68%	99%	99%	98%	96%	87%	91%	98%	70%	91%	95%	99%	99%	99%	100%
Annual average (µg m ⁻³)	-	-	22	18	17	15	17	15	14	16	19	14	16	17	18	20	19	18	18
Measured PM ₁₀ concentrations above 50 μg m ⁻³	5	6	10	3	6	5	3	1	2	6	8	5	1	4	3	11	7	1	3
Extrapolated PM ₁₀ concentrations above 50 µg m ⁻³	16	34	31	9	10	4	3	1	2	6	9	5	2	5	3	11	7	1	3
Second highest PM ₁₀ concentration (µg m ⁻³)					54	58	56	46	64	80	57	55	51	70	53	66	60	46	60
Annual maximum (µg m ⁻ ³)	58	60	81	58	59	62	56	46	67	82	59	61	56	79	61	74	61	57	66
Number of records	50	27	82	115	247	360	363	357	352	319	331	351	254	331	346	361	360	362	364

^{*}not adjusted for gravimetric equivalency

3.2. PM_{2.5} concentrations

In 2020 the Ministry for the Environment proposed a daily NES for $PM_{2.5}$ of 25 $\mu g/m^3$ and an annual NES of 10 $\mu g/m^3$ (Ministry for the Environment, 2020). $PM_{2.5}$ is generally accepted as the main air quality indicator for particulate in terms of health impacts with the long term exposure period being the most significant in terms of impact on health. A 2013 review of WHO guidelines noted that recent long-term studies show associations between $PM_{2.5}$ and mortality levels at concentrations well below the current annual WHO air quality guideline level for $PM_{2.5}$ (10 $\mu g/m^3$) and recommended a review of that value. During 2020 an annual average $PM_{2.5}$ concentration of 11.8 $\mu g/m^3$ was measured at Redwoodtown and compares with an annual average concentration of 11.3 $\mu g/m^3$ for 2019.

During 2020 there were 45 exceedences of the 24-hour average reporting guideline for $PM_{2.5}$ of $25\mu g/m^3$ at the Redwoodtown air quality monitoring site (Figure 3.11). The maximum measured $PM_{2.5}$ concentration for 2020 was 56 $\mu g/m^3$ and was recorded on 30 May. The corresponding PM_{10} concentrations was 60 $\mu g/m^3$. The greatest number of $PM_{2.5}$ exceedences of 25 $\mu g/m^3$ occurred in 2017 when this level was exceeded on 72 occasions.

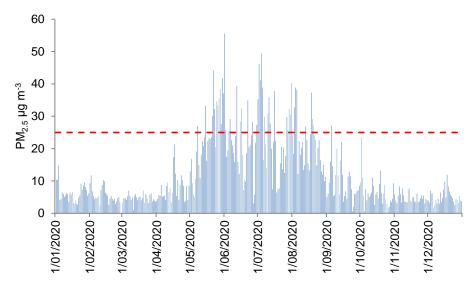


Figure 3.5: 24-hour average PM_{2.5} concentrations measured at the Redwoodtown – Bowling Club site during 2020.

3.3. Particulate concentrations and meteorology in Blenheim

Daily variations in PM_{10} and $PM_{2.5}$ concentrations and meteorological conditions on 20 May, 30^{th} May and 2 July when the 24-hour average PM_{10} concentrations exceeded 50 μg m⁻³ at the monitoring site are shown in Figure 3.6. Data are consistent with historical high pollution days with peak PM_{10} concentrations occurring during the evening and typically a smaller peak occurring mid-morning. The 2 July event differs slightly in that the concentration rise earlier at around 3pm and are dominated by the coarse fraction between 3pm and 5pm. The key meteorological conditions associated with the elevated concentrations on high pollution days are low wind speeds and south-westerly wind direction. The meteorological conditions on the 20 and 30 May are consistent with these conditions and on 2 July the wind direction is more westerly.

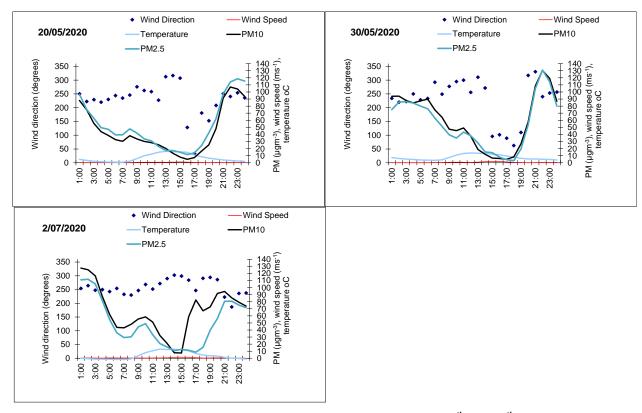


Figure 3.6: Hourly average PM_{10} , $PM_{2.5}$, wind direction and temperature on 20^{th} and 30^{th} May and 2 July 2020 when PM_{10} concentrations exceeded 50 $\mu g \ m^{-3}$ (24 hour average).

4. Trends in PM₁₀ concentrations in Blenheim

To quantify the impact of meteorological conditions and therefore further assess the likelihood of changes in PM_{10} concentrations since 2005, a trends assessment was updated in 2012 (Wilton, 2012). The objective of that work was to identify meteorological conditions giving rise to concentrations of PM_{10} in excess of the NES and to provide a tool for comparing year to year PM_{10} concentrations whilst minimising the impact of variability in meteorological conditions. The trends assessment provided a tool for updating the trends analysis with time. Figure 4.1 shows trends in PM_{10} concentrations updated with the 2020 PM_{10} data adjusted for the impact of meteorological conditions.

Results for 2020 are somewhere between the high values of 2018 and the lower values of 2019. Whilst the conclusion of no improvements in PM_{10} concentrations in Blenheim is supported by these results the potential that 2017 and 2018 results represented a trend of increasing concentrations is not supported by the 2019 or 2020 results. The data is not indicative of an overall improvement or degradation in PM_{10} concentrations in Blenheim. No trend is evident.

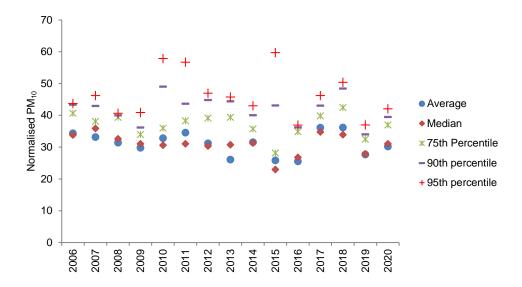


Figure 4.1: Trends in PM₁₀ concentrations after adjusting for meteorological conditions

To examine the potential for trends further, an evaluation was done of the number of high pollution potential days during 2020 compared with previous years as well as the number of exceedences that occurred on those days (Figure 4.2). It was noted that for 2017 that eight exceedences occurred on days that did not qualify as high pollution potential because they did not meet the minimum hours of temperature less than five degrees. These days had very low wind speeds and otherwise would have been classed as high pollution potential days.

Figure 4.2 shows that 2020 had a similar number of high pollution potential days to the 2015-2018 period, the proportion of these that experienced PM_{10} concentrations in excess of 50 $\mu g/m^3$ was on the lower end scale at 6% and is similar to 2019 and 2016 (both 5%). In contrast however, 2018 experienced the highest proportion at 30%. If the high pollution criteria for 2017 were extended to include the eight days when the NES was exceeded the number of pollution potential days would have increased to 27 and the proportion that resulted in exceedences would have increased to 41%.

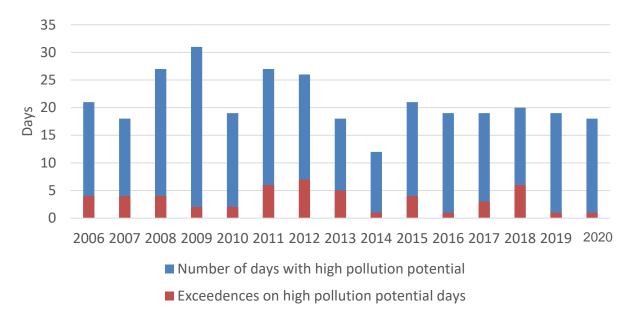


Figure 4.2: Prevalence of high pollution potential days and the number resulting in exceedences of 50 μg/m³ (24-hour average) PM₁₀.

5. Summary

During 2020 there were two breaches of the NES for PM_{10} in Blenheim. The maximum PM_{10} concentration was 66 μ g/m³ (24-hour average) and compares with a 2019 value of 57 μ g/m³. The annual average concentration for 2020 was 18 μ g/m³ and is similar to 2019. No trend in the data is evident.

Monitoring of $PM_{2.5}$ in Blenheim suggests that both annual and 24-hour average concentrations exceed the proposed NES for $PM_{2.5}$. The maximum daily $PM_{2.5}$ concentration is more than double the proposed NES of 25 μ g/m³ indicating that significant reductions would be required should this measure be introduced as a standard.

The NES for PM_{10} was reviewed by the Ministry for the Environment in 2011. A new date of September 2016 was given for compliance with 50 μ g m⁻³ (24-hour average, one allowable exceedence) for areas with fewer than 10 breaches. Blenheim was required to meet this target date which effectively meant Blenheim was unable to breach the NES for PM_{10} from winter 2017. The NES was breached in 2017, 2018 and 2020 in Blenheim. A location is required to be breach free for five years before it is no longer considered a polluted airshed.

Management measures to reduce PM_{10} concentrations to meet the NES have been included in the in the Proposed Marlborough Environment Plan (notified June 2016). Measures are based on a 2012 assessment which predicted concentrations would reduce from 2012 - 2018 in the absence of regulation. Potential reasons for the reductions not occurring include higher than anticipated emissions from newer burners and underestimated population increase in the airshed area from 2006-2013. Further evaluation of the effectiveness of the management options given the downward trend did not occur suggests that additional measures would likely be required to achieve the NES for PM_{10} . These may include a behaviour change programme targeting household's operation of wood burners.

A key air quality management scenario would arise if the proposed short term (24-hour average) NES for $PM_{2.5}$ of 25 $\mu g/m^3$ were introduced. Data indicates both high $PM_{2.5}$ concentrations and a high frequency of exceedances. The reductions in particulate concentrations and consequent air quality management required to meet this target would be likely be significant.

References

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