

Environmental Scoping Study

**Wairoa Timber
Processors Ltd**

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Wairoa Timber Processors Limited

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1 Summary

The purpose of this scoping report is to describe the current situation with regard to the environmental effects of the Wairoa Timber Processors Limited. This includes the identification of the resource consents currently held by Wairoa Timber Processors, the level of compliance with those consents based on monitoring data, and any other effects on the North Clyde environment that may be occurring as a result of activities on-site and if these are being adequately addressed. This scoping report will then inform the wider North Clyde Strategy that is being prepared concurrently.

From the information available at the time of preparing this report it has been identified that the activities at Wairoa Timber Processors Limited are currently complying in most part with the Resource Management Act 1991 and the relevant district and regional plans.

Key recommendations for Wairoa Timber Processors are:

- 1) To maintain reasonable operating hours to ensure noise emanating from the site is reasonable, and that operations staff remain mindful of the amenity of adjoining residents.
- 2) To maintain active management of the operation (the boiler, in particular) and continuing to look for further ways to minimise the potential for offensive smoke, dust emissions and windblown sawdust incidents to arise.
- 3) To address the current 'non-compliance' with the conditions of Discharge Consent (DP060565W) by either installing the wetland as per the original consent application, or amending the size in conjunction with Wairoa District Council, or applying to Hawke's Bay Regional Council to have the consent conditions changed.
- 4) To participate in any community advisory group that may be established to facilitate positive relationship building between local businesses and the residents of North Clyde.

2 Scoping Report Methodology

This scoping report has been developed using information obtained from a site visit held on the 29th January 2013 accompanied by the Operations Manager – Mike Pollock, data sourced from both Wairoa District Council and Hawke's Bay Regional Council, a broad desktop assessment, and input from Wairoa District Council's Environmental Health Officer.

It is important to note that although this report has sought to provide an accurate representation of the operation's activities, it is not a comprehensive environmental impact assessment.

3 Site Description

3.1 Business Details

Wairoa Timber Processors Limited is a kiln drying facility, and is located on Crarer Street in North Clyde. Wairoa Timber Processors has been in operation since 2006, following the granting of land use consent from Wairoa District Council and an air discharge consent from Hawke's Bay Regional Council.

The operation was initially set up as a partnership between East Coast Lumber and Clyde Lumber, but is now solely owned as a sister company of East Coast Lumber. The operation is currently managed by Mike Pollock (Business Manager), who manages both the Wairoa Timber Processors and East Coast Lumber sites.

The operation takes green sawn radiata lumber from the East Coast Lumber site. Approximately 4 - 5 (approximately 15 tonne) truck units per day are used to transport the lumber to the Wairoa Timber Processors site. Half of the final product is then transported back to the East Coast Lumber site for re-sorting and distributing – the other half goes directly from Wairoa Timber Processors site to the market.

The 3 kilns on-site are heated by high pressure hot water generated by a single intermediate-sized wood fired boiler (supplemented with coal as necessary).

Approximately 25 full time equivalents and 5 contractors are employed by Wairoa Timber Processors Limited and East Coast Lumber combined (staff work across the two businesses).

3.2 Site Details

Physical address: 2 – 14 Crarer Street, Wairoa

Site area: 2.7614 ha

Legal description: Section 1 Survey Office Plan 10205

Vacated old sports clubrooms are located towards the southern boundary of the property (new clubrooms were established elsewhere in Wairoa as part of the establishment of Wairoa Timber Processors on this site).

3.3 Applicable District and Regional Plans

The following section outlines the applicable district and regional plans and the specific sections of each plan that apply to the Wairoa Timber Processors site. A detailed assessment of the Wairoa Timber Processors site against the relevant sections of each plan are discussed further in section 7 below.

3.3.1 Wairoa District Plan

The Wairoa Timber Processors yard is located in the Industrial Zone in the Wairoa District Plan, bounded to the east by Rural-zoned land and Residential-zoned land across the road to the north – see planning map Figure 1 below.

The objectives and policies of the Industrial Zone aim to provide for the establishment of industry in this area, whilst avoiding, remedying or mitigating adverse effects on the environment and on the amenity values of surrounding areas (particularly where sites adjoin the Residential Zone).

The District Plan provides for any activity to locate in the Industrial Zone provided it can meet the Industrial Zone performance standards for permitted activities.

Permitted activity performance standards in the Industrial Zone include noise limits, odour & glare standards, building setbacks, parking and loading requirements, signage limits, hazardous substance thresholds, building freeboard requirements in flood prone areas, and earthworks limits.

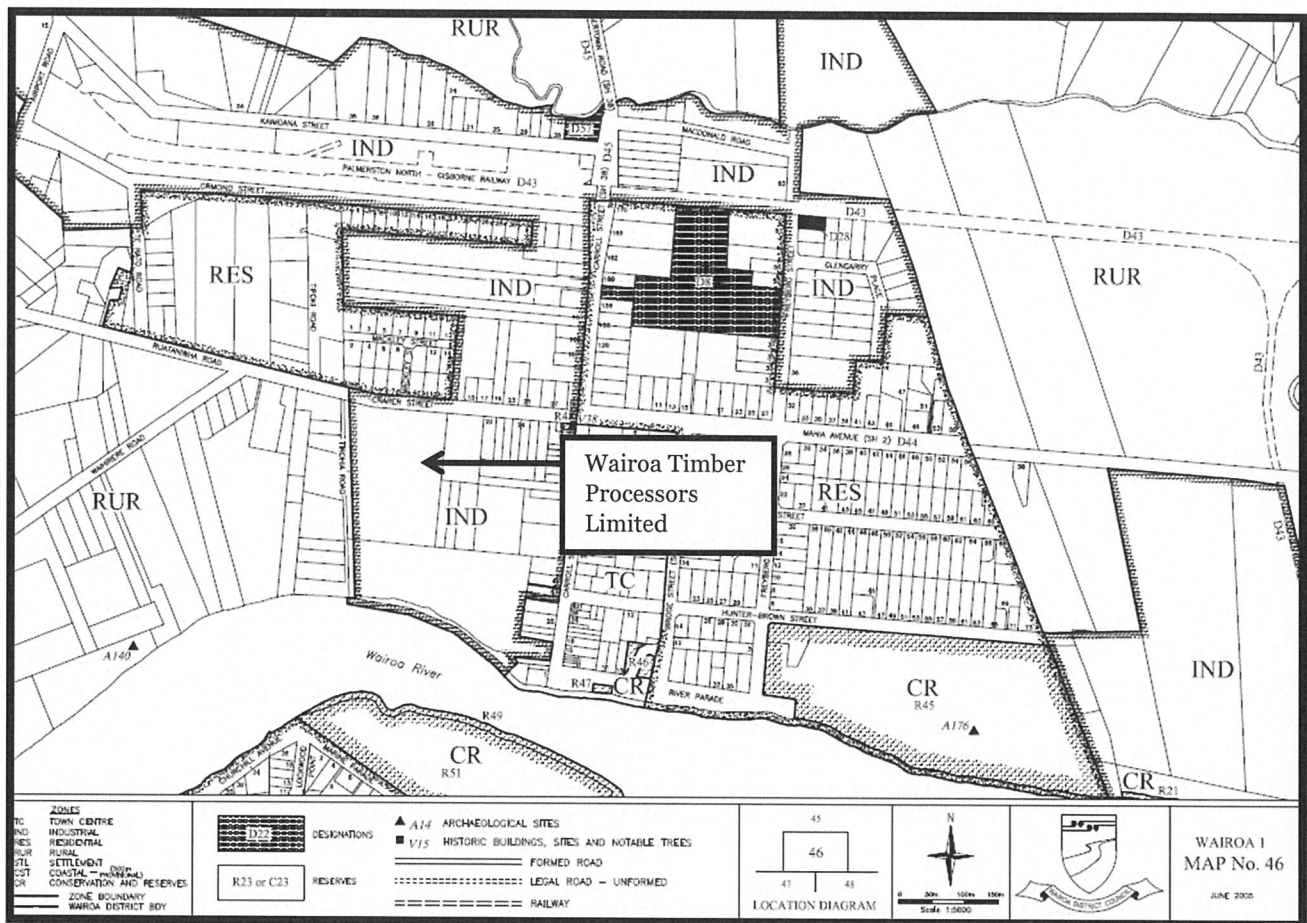


Figure 1 – location of Wairoa Timber Processors Limited on Wairoa District Council Planning Map

3.3.2 Hawke's Bay Regional Resource Management Plan (RRMP)

The Hawke's Bay Regional Resource Management Plan applies to the Wairoa Timber Processors Limited site. This Plan addresses matters such as odour, dust, and discharges to land and water and the way in which Wairoa Timber Processors Limited need to manage their site in relation to these matters.

Rules 28 and 29 of the RRMP are considered to be most applicable rules relating to discharges to air from industrial and trade premises. This activity was deemed to be a discretionary activity under the RRMP and Wairoa Timber Processors Limited obtained the appropriate resource consent in order to 'discharge products of combustion into the atmosphere from a 2.7 and a 5 megawatt boiler fuelled by wood waste and coal'¹. Refer to Appendix 2 for a copy of the regional resource consent documentation, and section 7.1.2 of this report for further discussion.

¹ Note: as the facility only receives lumber from East Coast Lumber (and not Clyde Lumber as well, as originally planned), only one boiler has been commissioned. In addition, only 3 kilns have been commissioned instead of the planned 10 kilns originally consented.

4 Current Activities/Operations On-Site

4.1 Site Plan & Operation



Figure 2: Location of Wairoa Timber Processors site

As can be seen from Figures 2 & 3, there is one main building located centrally on the site. This building is the main 'Drying' area where green sawn radiata lumber is kiln dried.

There are 3 kilns which are heated by high pressure hot water generated by a single intermediate-sized wood fired boiler (supplemented with coal as necessary).

Green sawdust trucked to the mill from East Coast Lumber (supplemented as necessary with Waikato coal) are used to fuel the boiler. Wood shavings/ dust are stored in dedicated fuel bins with the fuel feedstock automatically conveyed to the boiler firebox in the correct proportions on demand.

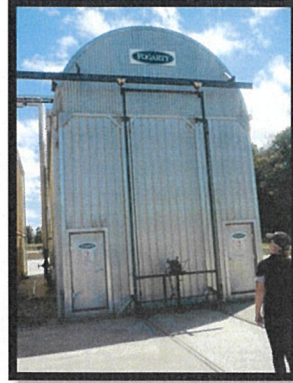
No milling of timber is carried out on site. Milled timber is brought to Wairoa Timber Processors from the East Coast Lumber site on Carroll Street, by approximately 4-5 truck units (approximately 15 tonne) per day.

To the north of the main building is a timber storage area. From discussion with the Business Manager, the timber does not remain on site for any length of time. On most occasions the timber is stock piled for up to a week and transported off site upon completion of drying.

Large earth bunds are located to the north and west of the site. These large earth bunds have been developed for two reasons; to provide a means to reduce noise created by the on-going operation of the plant, particularly activities associated with the operation of trucks within the yard and; as a means to screen the industrial activities occurring on the site from neighbouring residences.



Photograph 1: View of bunded area to the west of the site



Photograph 2: View of one of the 'drying' kilns

The site has one access (entry/ exit) point to Crarer Street which is considered to be a Collector Route according to (Appendix II Rooding Hierarchy) of the Wairoa District Plan. From this access point timber transport trucks are able to manoeuvre around the front of the property to load/ unload timber.

The majority of the site is currently grassed with the main yard area gravelled. As the facility only serves the East Coast Lumber operation, approximately only one third of the original site development proposed has eventuated. According to the Business Manager 'the Boilers and Kilns operate 24 hours a day, 7 days per week, and the moving plant can operate from 6am till 5pm but more often starting at 6.30am'.

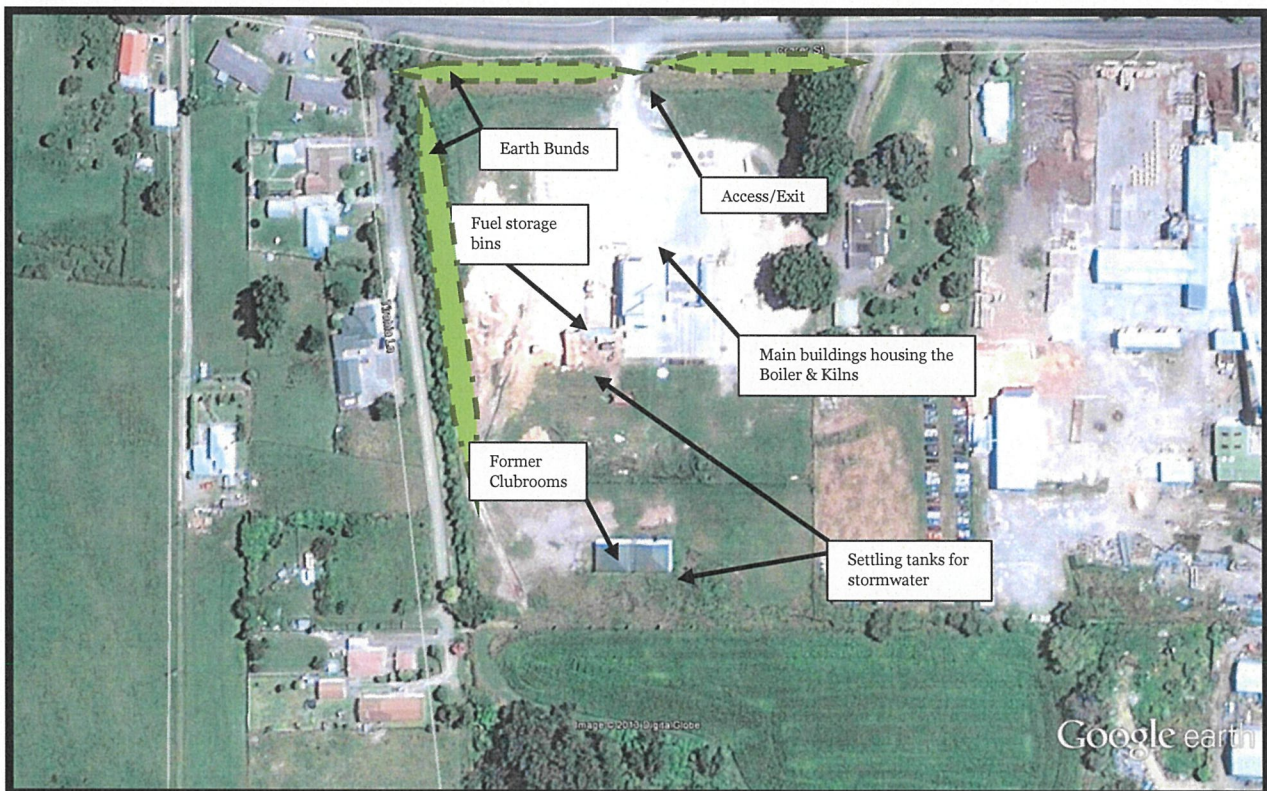


Figure 3: Site Plan

4.2 Site Servicing

Wairoa Timber Processors are connected to town water supply and town sewer. The site is not connected to town stormwater at present, but there is a requirement to connect when directed by Wairoa District Council as part of the Council's on-going stormwater upgrading proposed for the area in the future. Stormwater from the hardstand areas and buildings currently discharges to the town sewer.

5 Environmental Effects Occurring/Observed

5.1 Environmental Effects

On the 29th January 2013 a site visit was undertaken to understand the nature of the Wairoa Timber Processors Limited operation. A discussion was held with the Business Manager, Mike Pollock at that time. From the site visit and discussions with Mr Pollock, the following environmental effects were identified/ observed.

5.1.1 Discharge to Air

5.1.1.1 Smoke

The drying operation involves the operation of a single wood fired boiler and three kilns, which discharge to air via chimney stacks.

The products of combustion from the boiler include small concentrations of carbon dioxide, carbon monoxide, oxides of nitrogen, some organic compounds, some smoke, water vapour and some particulate matter (wood ash, and partially burnt fuel (char and smoke)). Under normal operations the concentration of particulate matter discharged from the boiler stacks is less than 250mg/Sm³ adjusted to 12% carbon dioxide by volume when the boiler is operating at maximum load.

Under normal operations the discharge of smoke is minimal and the discharge has a low rate of odour emission (that is, it is not expected to cause odour nuisance to neighbours).

5.1.1.2 Dust

Despite being a predominantly gravelled/ grassed yard, dust does circulate around the yard during the dry summer months. This is an issue for Wairoa Timber Processors Limited, particularly on windy days. A number of mitigation measures have been instigated to address the issue of dust. These are discussed further in section 6.1.1.2 of this report.

Windblown sawdust is a minor issue for the Wairoa Timber Processors site. Sawdust stored on the site is generally not stored for long. Sawdust delivered to the site is dumped into a large storage bin or onto a purpose-built concrete pad (connected to the storage bin), then pushed straight into the fuel bins that feed the boiler. Sawdust is effectively contained so that it does not get blown around and does not get left in a pile to sit outside.

5.1.2 Traffic

The nature of this business means that there are truck movements into, around and out of the yard on a frequent basis. The trucks entering the site are generally smaller trucks that are used to transport the timber material to the site upon completion of the milling operation at East Coast Lumber just down the road – these truck movements number approximately 4-5 trucks to and from the site each day.

5.1.3 Visual Impact

From a site observation it appears that the visual impact of the activity from the Crarer Street entranceway, is relatively low. The trucks access the yard from one entry point with earth bunds along the remainder of the site boundary along this road.

Similarly, the earth bund along the western boundary screen the operation from residences on Tirohia Lane.

5.1.4 Wastewater/ Stormwater Discharge

The majority of the yard comprises of permeable surface, therefore much of the site's stormwater permeates into the ground. Currently stormwater from the hardstand areas and buildings on-site is discharged into the Council sewer system. Two settling tanks with pumps operate between Wairoa Timber Processors and the sewer – these can be shut off in a major flood event, and water kept in the tanks until conditions improve.

5.1.5 Noise/ Vibration

Noise/ vibration is inevitable in a yard such as this one, particularly given the trucks entering and exiting the site on a regular basis. The trucks braking to enter the site, their manoeuvres whilst entering, turning and exiting the yard all generate noise/ vibration.

The movement of timber to and from the trucks into the kiln operation, and also from loading of sawdust into the fuel storage bins etc, also causes noise/ vibration effects. However, for the most part, noise emissions are contained within the site by the presence of significant earth bunds along the western and northern boundaries of the site, protecting residential properties nearby.

Previous issues with noise experienced by residents in the early morning and late at night from loader movements have been addressed through the installation of an additional fuel cell.

5.1.6 Hazardous Substances

Wairoa Timber Processors has no hazardous substances held on site.

5.2 Complaints History/Experience

From a review of the Wairoa District Council complaints records, there have been sixteen(16) complaints recorded in the last 5 years – the majority (9) of these were recorded during 2010 and related to noise from loaders or other plant operations at the site occurring particularly early or late in the day (considered to be outside reasonable operating hours). Notably, noise from this site has not generated any formal complaints since November 2010.

More recent complaints were for offensive smoke discharge – 2 complaints on 23 December 2011, and 1 complaint on 11 December 2012 which was subsequently referred to Hawke's Bay Regional Council.

From a review of Hawke's Bay Regional Council's complaints register there have been two complaints recorded in the last 5 years – in June 2010 and December 2012. The complaints received were in relation to smoke discharges. Issues relating to smoke discharge were generally tracked to specific management and plant malfunction incidents.

From a discussion with the Business Manager, Mike Pollock, there have been comments to him in the past, mainly in response to smoke emissions emanating from the site. There have been incidences where black smoke in the vicinity of the Wairoa Timber Processors site has been attributed to their operation – some of these which were considered by Wairoa Timber Processors to be more related to corresponding instances of burning wet sawdust at the nearby Clyde Lumber site which smouldered for days and also caused thick black smoke. There is a general acceptance however that black smoke is known to have been emitted on occasion when the boilers have become blocked.

6 Environmental Initiatives

6.1.1 Air Discharge

6.1.1.1 Smoke

Incidents of black smoke emissions from the plant have been largely attributed to malfunction in the boiler operation. Plant operations are monitored through the use of a computer program linked to smart phones. The program alerts operations staff immediately, of any plant malfunctions occurring on-site, and allows the boiler to be stopped remotely if necessary – staff can then get in and fix the problem quickly – anytime, day or night.

This has been in place for a couple of years but was originally only provided to the processing manager. In response to incidents in the last couple of years, all 3 operations staff now have this technology, ensuring that malfunctions are able to be responded to even more quickly. Operations staff are all Wairoa-based and live close by, and can respond in a very short space of time. The Business Manager believes this system has significantly improved the ability to respond and address plant malfunctions in a timely manner, and the incidents of offensive smoke are expected to be significantly reduced, if not eliminated altogether.

6.1.1.2 Dust

The earth bund provides some ability to contain dust within the site. Wairoa Timber Processors can also access the old fire truck from the East Coast Lumber site as a mitigation measure enabling water to be sprayed on the ground as a means of suppressing dust, if required.

Windblown sawdust potential is largely mitigated through containment in storage bins which then feed directly into fuel feed bins.

6.1.2 Stormwater

In the event of storm events, the plant has the ability to shut down their pipes connecting to the sewer (utilising inline storage tanks) to ensure that they do not contribute to overloading the system. The facility has activated this measure on occasion, voluntarily.

6.1.3 Visual Amenity

In order to mitigate visual amenity effects, a large earth bund has been constructed along the northern and western extent of the Wairoa Timber Processors site. The bund on the northern boundary has now been fully planted, which goes some way towards reducing the overall visual effect of the site for neighbouring residents. The bund on the western boundary is largely vegetated and further screening is provided by existing trees maturing along the boundary. In time, once there is good plant establishment along the Crarer Street frontage, visual impact is expected to become even further reduced.

6.1.4 Noise

Issues around noise from moving machinery in the early morning or late at night have been largely addressed. Originally the site only had one fuel cell, but a second fuel cell was constructed in recent times. Now both fuel cells can be fully loaded up by 5pm at night with enough to fuel the boiler right through the night, removing the need to run moving machinery outside normal working hours to re-fill the fuel cell and keep the kiln operating 24 hours a day.

The earth bunding discussed above also contributes to attenuating noise emanating from the site for neighbouring residential properties.

6.1.5 Community Engagement

The resource consent process for the 'Dry' timber kiln involved a significant level of community consultation.

Business Owner/ Manager, Mike Pollock, has indicated an interest in participating in a community advisory group to better facilitate regular on-going positive communication between local businesses and the residents of North Clyde, recognising that all parties have a legitimate role to play in the future of North Clyde and Wairoa in general.

7 Current Planning Status

7.1 District & Regional Plan Compliance

The two relevant planning documents that apply to the Wairoa Timber Processors site and operations are:

- the Wairoa District Plan (June 2005), administered by Wairoa District Council;
- the Hawke's Bay Regional Resource Management Plan (August 2006), administered by Hawke's Bay Regional Council.

7.1.1 Compliance with the Wairoa District Plan (June 2005)

Wairoa Timber Processors was established on this site under the provisions of the current Wairoa District Plan. Therefore, it was assessed against the provisions of that Plan, and found not to require land use consent from the Wairoa District Council other than for earthworks associated with Stage 1 site development works. The operation of the 'Dry' kiln on this site is, of itself, a permitted activity in the Wairoa District Plan.

In terms of noise, in the qualified opinion of Wairoa District Council's Environmental Health Officer, noise emanating from the Wairoa Timber Processors site likely complies with the relevant limits in the Wairoa District Plan in the most part. It is noted however, that whilst the site likely complies, noise is also regulated by section 16 of the Resource Management Act 1991. Under section 16, Wairoa Timber Processors has a general duty to avoid unreasonable noise – *'Every occupier of land... shall adopt the best practicable option to ensure that the emission of noise from that land...does not exceed a reasonable level'*. Enforcement of this specifically excludes noise from trains or vehicles on roads, and only relates to noise heard from a place other than where the noise is made.

7.1.2 Compliance with the Hawke's Bay Regional Resource Management Plan (August 2006)

The following table provides an assessment of Wairoa Timber Processors activities in terms of compliance with the provisions of the current operative Hawke's Bay Regional Resource Management Plan.

The following is an assessment of the activity against the applicable rules, and any relevant standards and conditions for permitted activities, in the current Regional Plan²:

Hawke's Bay Regional Resource Management Plan		
Discharges to Air		
Rule 28 Miscellaneous Industrial & trade premises	<p><i>The discharge of contaminants into air from any industrial or trade premises arising from any of the following activities, that is not specifically regulated by any other rule within this Plan:</i></p> <ul style="list-style-type: none"> combustion of coal, light fuel oil, heavy fuel oil or untreated wood with a maximum heat output that exceeds 100 kW <p>is a Discretionary Activity.</p>	<p>Wairoa Timber Processors carry out activities that are caught by Rule 28, and hold a current resource consent 'to discharge products of combustion into the atmosphere from one 2.7 and one 5 megawatt boiler fuelled by wood waste and coal'.</p>
Rule 29 Minor discharges from industrial & trade premises	<p><i>The discharge of contaminants into air from any industrial or trade premises that is not specifically regulated by any other rule within this Plan, including:</i></p> <ul style="list-style-type: none"> discharges of heat to air discharges of dust arising from the loading, unloading, and conveyance of goods and materials (including aggregates). <p>is a Permitted Activity subject to various specific conditions, standards and terms.</p> <p>Conditions of particular relevance include:</p> <ol style="list-style-type: none"> <i>The opacity of any discharge of smoke when measured at the point of discharge shall not exceed 20%, except that a discharge in excess of this shall be permitted for a period of not more than two minutes continuously or for an aggregate of four minutes in any 60 min period.</i> <i>At any point beyond the boundary of the subject property, or on public land;</i> <ol style="list-style-type: none"> <i>The discharge shall not result in any noxious or dangerous levels of airborne contaminants;</i> <i>There shall be no visible discharge of any contaminant, other than smoke from fuel burning equipment or water vapour;</i> <i>Any discharge of water vapour shall not result in any plume which adversely affects traffic safety, or reduces visibility within a height of 5 metres above ground level, or reduces visibility within recognised flight paths in the vicinity of airports;</i> 	<p>It is likely that Wairoa Timber Processors complies with these requirements most of the time.</p> <p>On dry, windy summer days, it is possible that the discharge of dust criteria would not be met.</p> <p>The presence of the earth bund as a means of containing dust, and the ability to deploy the old fire truck from the East Coast Lumber site to spray water on the ground to suppress dust when necessary, likely mitigates dust emissions to within dust criteria.</p>

² Note: Existing use rights do not apply to rules in a regional plan.

	<p>iv. The discharge shall not result in any offensive or objectionable odour;</p> <p>v. The dust deposition rate resulting from the discharge shall not raise the ambient dust deposition rate by more than 4g/m² per 30 days;</p> <p>vi. The discharge shall not result in any objectionable deposition of particulate matter on any land or structure.</p>	
Discharges to Water		
<p>Rule 47</p> <p>Discharges to surface water</p>	<p><i>The discharge of contaminants into surface water, pursuant to section 15(1)(a) RMA, except as expressly regulated by other rules in this Plan.</i></p> <p>is a Permitted Activity subject to various specific conditions, standards and terms.</p>	<p>Wairoa Timber Processors hold a resource consent as a discretionary activity <i>‘to divert and discharge stormwater from an industrial and trade premise of 2.7 hectares, that includes a timber drying plant.</i></p> <p>This consent reflected the original proposal to discharge stormwater from the site into a purpose-built man-made wetland area. However, as the operation is substantially less than first anticipated, and site coverage is only a third of what was initially proposed, this consent has not been activated. Stormwater from hardstand areas and buildings on-site currently discharges to the town sewer.</p>

Wairoa Timber Processors carry out various activities that are captured by rules in the Hawke’s Bay Regional Resource Management Plan, leading to a requirement for resource consents to address those aspects of their operations. Wairoa Timber Processors has all the necessary resource consents in this regard.

7.2 Operational Resource Consents

Wairoa Timber Processors has several operational resource consents, each of which have a number of conditions attached.

Wairoa District Council – Wairoa District Plan

- **Land Use Consent** – Consent No. RMO60086 – to undertake earthworks associated with site development works relating to stage 1 of the development of the Dry mill.
- **Land Use Consent** – Consent No. RMO70022/ASW – ‘to erect a fence for noise attenuation’. This activity was subsequently confirmed as a Permitted Activity.

The fence was never constructed, as the earth bund was progressed and the fence deemed no longer necessary. This was confirmed with the issuing of the Code of Compliance Certificate for the construction of the earth bund (BY 070100) – a note was added to the building consent file at the time, confirming the District Planner’s acceptance that a fence was no longer required.

Hawkes Bay Regional Council – Hawke’s Bay Regional Resource Management Plan

- **Discharge Permit** – Consent No. DP100552A – *‘to discharge products of combustion into the atmosphere from one 2.7 and one 5 megawatt boiler fuelled by wood waste and coal’.* This consent has been granted for a period expiring on 31 May 2031.
- **Discharge Permit** – Consent No. DP060565W – *‘to divert and discharge stormwater from an industrial and trade premise of 2.7 hectares’.* This consent is granted for a period expiring on 31 May 2013. This consent has not been activated...refer to comments above in section 7.1.2.

7.2.1 Conditions of Consent

Land Use Consent (RMO60086): *to undertake earthworks associated with site development works relating to stage 1 of the development of the Dry mill.*

The above resource consent was granted by Wairoa District Council as a discretionary activity for preparation of the site for the initial development of the ‘Dry’ timber mill and for the establishment of environmental mitigation measures, particularly a perimeter earth bund. [conditions applying to this consent???

Discharge Permit (DP100552A): *to discharge products of combustion into the atmosphere from one 2.7 and one 5 megawatt boiler fuelled by wood waste and coal.*

The above resource consent imposes a range of conditions on the Wairoa Timber Processors operation, and a number of monitoring requirements. The most notable of these are:

- 3) *The Discharge shall only be combustion products from boilers fired by wood and supplementary coal, having a combined gross output of not more than 6.4 megawatts, and associated fuel handling products.*
- 4) a) *The discharge into air from the boilers shall occur via two individual chimney stacks at least 18 metres in height above ground level.*
- 4) b) *The discharges shall be directed vertically into air and shall not be impeded by any obstruction above the stack that decreases the vertical efflux velocity below that which would occur in the absence of such an obstruction.*

- 5) Wood burned in the boilers shall be untreated or contaminated with any chemicals.
- 6) The combined coal burning rate shall not exceed 360 kilograms per hour and 15 percent of the boiler fuel load.
- 7) The sulphur content of coal burned in the boilers shall not exceed 0.25 percent by weight.
- 9) The opacity of emissions from the boiler stacks shall not be darker than Ringelmann Shade 1 as described in New Zealand Standard 5201:1973 (except in special cases as specified in the consent conditions).
- 11) The concentration of particulate matter less than 10 microns (PM₁₀) in combustion gas discharged from the boiler emission stacks, measured in accordance with Condition 13 (Condition 13 specifies methods for measurement and sampling), and averaged over each emission test, shall not exceed 150 milligrams per cubic metre adjusted to 0 degree Celcius, 101.3 kilopascals, and 8.5 percent oxygen on a dry gas basis.
- 12) The combined mass emission rate of PM₁₀ from all boilers, measured in accordance with Condition 13, shall not exceed 1 kilogram per hour.
- 14) There shall be no discharge of odour or particulate matter as a result of the exercise of this permit that is noxious, dangerous, offensive or objectionable to the extent that it causes an adverse effect beyond the boundary of the property in the opinion of an authorised enforcement officer of the Consent Authority.

Also of note, the consent conditions state that this permit shall not commence until Discharge Permit DP060564A has been surrendered or expires and that a management plan (containing specific requirements as stipulated in the consent conditions) for the operation and maintenance of the boilers needs to be provided to the Consent Authority within 3 months of the date of commencement of this consent. The conditions of consent also require annual maintenance of the boilers.

A record of complaints relating to odour, smoke or particulate matter caused by the boiler discharge is also required to be maintained³.

Discharge Permit (DP060565W): to divert and discharge stormwater from an industrial and trade premise of 2.7 hectares, that includes a timber drying plant.

The above resource consent imposes a range of conditions on the Wairoa Timber Processors operation, and a number of monitoring requirements. The most notable of these are:

- 1) All operations are to be undertaken in accordance with the stormwater treatment design Plan 1 & Plan 2 as submitted with the application.
- 2) All works and structures relating to this resource consent shall be designed and constructed to conform to the best engineering practices and at all times maintained to a safe and serviceable standard.
- 3) All first flush stormwater (one third of the 2 year annual return interval) from the non roofed hard paved areas on the site shall be collected and treated via a wetland prior to discharge to the Wairoa River.
- 4) The wetland built in accordance with Condition 3, shall be lined with clay, and designed to achieve a 75% reduction in total suspended solids within the site stormwater, prior to discharge offsite.

³ Wairoa Timber Processors have a register for complaints – to-date there is very little contained in the register, other than complaints referred to Wairoa Timber Processors from the Councils.

5) All site stormwater shall be discharged into the existing west boundary drain at a maximum rate of 1 litre per second for events with a return period of 2 years or less, and 3 litres/ second with a return period between 2 – 10 years.

6) The stormwater outlet drain shall be designed to prevent erosion and, or scour around the outlet.

7) No other waste associated with the timber processing operation shall be discharged into the stormwater system.

8) An emergency shutoff valve shall be available at the outlet drain capable of preventing stormwater from being discharged off the site.

9) A sign shall stay erected and at all times maintained adjacent to the shutoff valve required by conditions of this consent, and shall provide clear instructions on the use of the shutoff valve should a spill occur on the industrial site.

7.2.2 Consent Compliance History

Hawke's Bay Regional Council regularly monitors Wairoa Timber Processors for compliance with the conditions of its resource consents.

On the 9th October 2012, a monitoring inspection was undertaken at the Wairoa Timber Processors property in relation to Discharge Permit (DP100552A): *'to discharge products of combustion into the atmosphere from one 2.7 and one 5 megawatt boiler fuelled by wood waste and coal'*. The operation was found to be fully compliant with the consent conditions in respect of its discharges to air from the kiln drying process.

On the 6th April 2011 a monitoring inspection was undertaken at the Wairoa Timber Processors property in relation to Discharge Permit (DP060565W): *'to divert and discharge stormwater from an industrial and trade premise of 2.7 hectares, that includes a timber drying plant'*.

During this monitoring inspection a 'Significant Non Compliance' was recorded as follows, *'The significant non-compliance identified in this report relates to the wetland not being constructed. It is important that the consent holder have discussions with Wairoa District Council over the use of their sewer line for stormwater discharges. Secondly, either install the wetland as per the application for this consent, or amend the size in conjunction with WDC, or apply to have the consent conditions changed'*.

The monitoring inspection also noted that all other aspects of that consent are currently compliant and of particular note, *'all hardseal stormwater discharges are collected in a sump and then pumped to the Wairoa District Council Tradewaste line'* and *'The pump is used as a 'shut-off valve'*.

As discussed above, this consent has not been fully activated as stormwater is still being discharged to the town sewer. Furthermore, the Business Manager has indicated that it is unlikely that the wetland aspect of the consent will ever be activated in the future, as site coverage (hardstand) is only a third of the original proposal. The original site was going to have 10 kilns and 6 boilers and occupy more than half the site, however because of what has happened to Clyde Lumber and timber processing in general, only 3 kilns and 1 boiler have eventuated. The existing site footprint is what will remain indefinitely, and stormwater runoff is correspondingly less than originally anticipated. Wairoa Timber Processors consider on-site discharge and wetland treatment of stormwater is not necessary given the scale of development that has eventuated.

Wairoa District Council issued a Code of Compliance Certificate for building work associated with the facility in November 2012 (BY 070111). The certificate was issued on the proviso that:

- 1) The existing stormwater has been allowed to drain into the existing sewer system as a temporary measure, and
- 2) The owner(s) or subsequent owners of the land will redirect the existing stormwater system at their cost and connect into the newly constructed stormwater system as directed by WDC Engineering Department.

This provides some legitimacy to the existing discharge of stormwater to the town sewer, but also of the expectation of connection to a newly constructed stormwater system in the future.

Irrespective of this, the issue of 'non-compliance' does however need to be properly addressed with Hawke's Bay Regional Council, and the consent either surrendered, or conditions relating to the wetland aspect of the proposal deleted via a variation to the consent.

7.3 Summary of Compliance

Wairoa Timber Processors holds a resource consent for earthworks associated with Stage 1 site development works, but the 'Dry' kiln operation itself is a permitted activity in terms of land use.

However, Wairoa Timber Processors carries out activities that are captured by rules in the Hawke's Bay Regional Resource Management Plan. Existing use rights do not apply to regional rules. Wairoa Timber Processors holds all necessary resource consents for those aspects of its operations (as originally proposed) from Hawke's Bay Regional Council. These consents have numerous conditions attached to them, and the Regional Council monitors compliance with those conditions on a regular basis.

In terms of its resource consent for discharges to air (the most relevant consent in terms of effects on neighbouring residential amenity), Wairoa Timber Processors has made improvements to address plant malfunction and has been deemed by the Regional Council to be fully compliant with the conditions of its consent. It is recognised that there are outstanding issues for other consents it holds in relation to stormwater discharges – this is a matter of on-going non-compliance that is understood to be in the process of being addressed.

All in all, Wairoa Timber Processors achieve general compliance with relevant District and Regional planning requirements in terms of day-to-day operations – albeit that there have been occasional incidents that have involved the breaching of regional consent conditions. There now appears to be adequate measures in place to respond to and address such breaches, as and when they occur, including a formal 'Management Plan' for the management and operation of the boilers, as required by condition 8 in Discharge Permit (DP100552A), and the use of smart phone technology to alert operations staff of any system malfunctions.

The most pressing matter is the requirement under Discharge Permit (DP060565W), for the construction of a *'wetland built in accordance with Condition 3, shall be lined with clay, and designed to achieve a 75% reduction in total suspended solids within the site stormwater, prior to discharge offsite'*. For various reasons, the construction of the wetland is no longer considered necessary and is not proposed to take place. As outlined in the Hawke's Bay Regional Council's monitoring report however, *'it is important that the consent holder...either install the wetland as per the application for this consent, or amend the size in conjunction with WDC, or apply to have the consent conditions changed'*.

8 Conclusions & Recommendations

From a review of Wairoa Timber Processors' activities, and observation of activities on the site (alongside current consents), the following identifies areas of non-compliance with consent conditions that require addressing, and also potential opportunities for improvements in overall environmental performance generally:

- 1) **Noise** – noise complaints recorded in relation to this site have primarily related to site activities occurring outside of normal operating hours. The installation of a second fuel cell has largely removed the need to operate outside normal working hours. Wairoa Timber Processors need to ensure that they continue to operate within reasonable hours of operation.
- 2) **Discharge to Air** – Wairoa Timber Processors holds a discharge to air consent from the Hawke's Bay Regional Council. Although in most part, Wairoa Timber Processors is meeting their requirements under this consent, there have been complaints received in relation to the occasional discharge of offensive smoke. It is understood that plant operations are managed more effectively now, with the use of smart phone technology and distributing this technology to all 3 operations staff. It is important however to continue to comply with consent conditions and manage the operation in a manner that minimises incidents and enables speedy response to plant malfunctions.
- 3) **Stormwater Controls/ Construction of Wetland** – Discharge Consent (DP060565W) requires the construction of a *'wetland built in accordance with Condition 3 (of that Permit), shall be lined with clay, and designed to achieve a 75% reduction in total suspended solids within the site stormwater, prior to discharge offsite'*. For various reasons, it is understood that the construction of the wetland is no longer considered necessary and is not proposed to take place. As outlined in the Hawke's Bay Regional Council's monitoring report however, *'it is important that the consent holder...either install the wetland as per the application for this consent, or amend the size in conjunction with WDC, or apply to have the consent conditions changed'*. It would be advisable for Wairoa Timber Processors to address this matter directly.

Overall it is recommended that Wairoa Timber Processors Limited be encouraged and supported to:

- 1) Maintain reasonable operating hours to ensure noise emanating from the site is reasonable, and that operations staff remain mindful of the amenity of adjoining residents.
- 2) Maintain active management of the operation (the boiler, in particular) and continue to look for further ways to minimise the potential for offensive smoke, dust emissions and windblown sawdust incidents to arise.
- 3) Address the current 'non-compliance' with the conditions of Discharge Consent (DP060565W) by either installing the wetland as per the original consent application, or amending the size in conjunction with Wairoa District Council, or applying to Hawke's Bay Regional Council to have the consent conditions changed.
- 4) Participate in any community advisory group that may be established to facilitate positive relationship building between local businesses and the residents of North Clyde.