

Purpose & Scope:

The Air Quality Operations and Maintenance Manual sets out the actions NCI will take to operate and maintain the Upper Hutt plant to maintain compliance with the air discharge permit number WGN 110219 [30888].

Revisions:

Version	Date	Amendment
1	20/10/2014	First version to GWRC
2	31/10/2014	Some modifications made following comments from GWRC.
3	16/3/2016	Revised OMM following management structure change
4	27/7/2018	Review

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Introduction

NCI Packaging (NZ) Limited (NCI) operates under air discharge permit number WGN110219 [30888] issued by Greater Wellington Regional Council (GWRC) in 2013. A copy of the consent conditions are contained in Appendix B. Condition 13 of this permit requires NCI to prepare and maintain an Operations and Maintenance Manual for the site. This plan is required to cover:

- a) A summary of the plant purpose, location, layout, and manufacturing equipment with specific reference to contaminant discharge, extraction and treatment equipment, discharge stacks and processes, including responsibilities and contact details of key personnel
- b) Operation, inspection and maintenance of the manufacturing equipment, including the extraction and treatment equipment
- c) Procedures adopted to ensure that the extraction equipment is fully functional before manufacturing commences
- d) Procedures adopted to ensure that the plant complies with the conditions of this consent at all times
- e) Contingency plans in the case of accidents and emergencies, such as spills, fires, and incidents where the discharge of excessive contaminants to air was unavoidable; and
- f) Any other issues considered important, including:
 - Details of the general operation and maintenance of all emissions control equipment (including the associated ducting for this equipment)
 - Staff training on the process requirements, use of emissions control equipment, and emergency response
 - Details of how the building envelope is maintained to minimise the potential for fugitive emissions

Locations and Layout

Plant Purpose

The factory is shared between two operations, two Tinsplate Can assembly lines to the western side of the building, and an Aluminium Aerosol (AAe) Can manufacture line on the eastern side. The production flows through the production lines from South to North along the factory. The tinsplate assembly lines make negligible discharge to atmosphere.

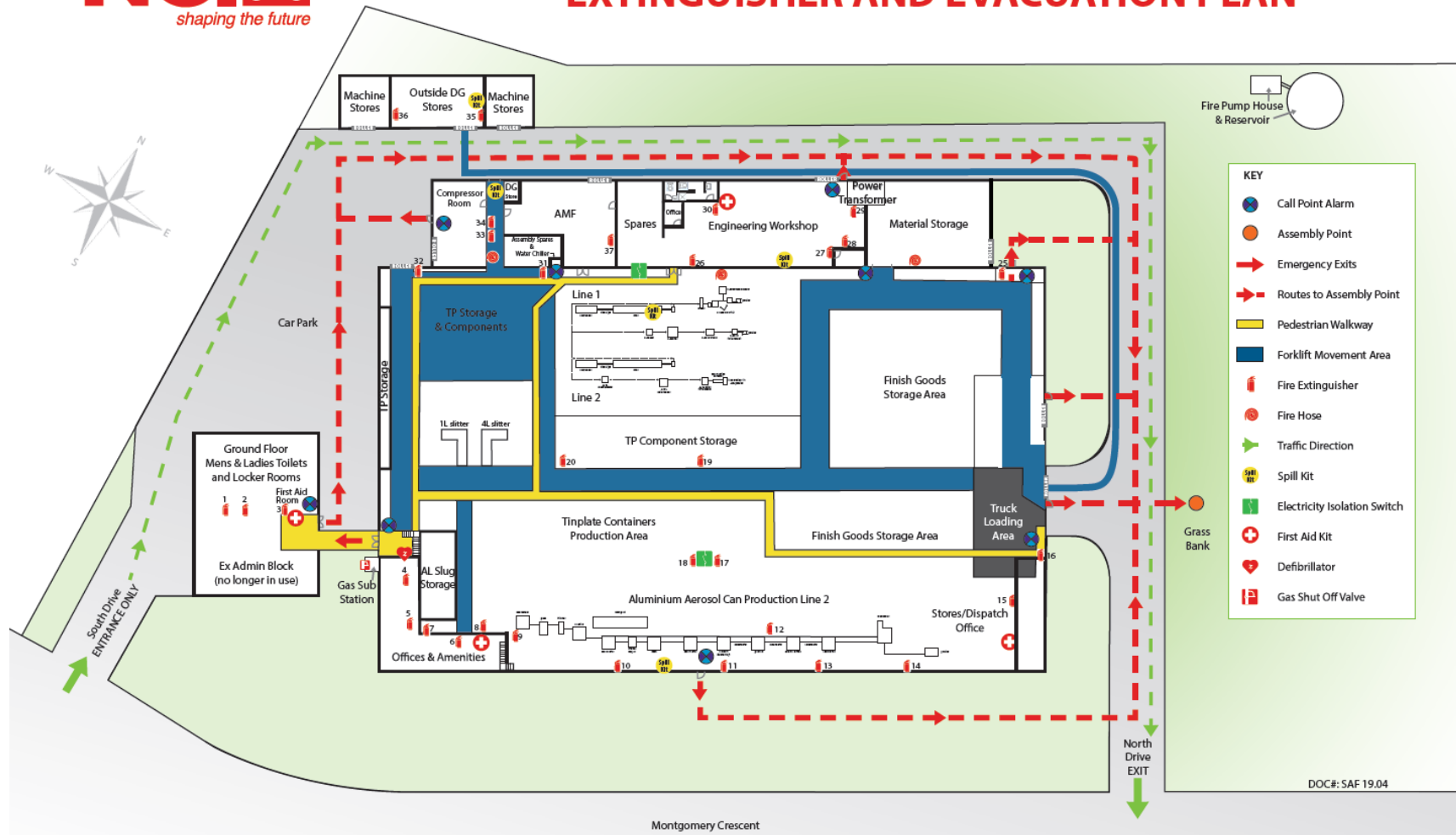
Layout

The plant is situated at 62-66 Montgomery Crescent, Upper Hutt. The aluminium extrusion lines are shown on the attached drawing. The initial AAe process is an impact extrusion operation that produces a Can from a slug of high purity aluminium. The processes in order are then trimming to length, washing to remove all traces of lubricants, internal lacquer lining by spray application, coating by roller of the base layer of outside decoration, printing of the decoration detail, over-lacquer application by roller, necking in the open end, forming of the top curl and then packaging.

Figure 1 Site Layout



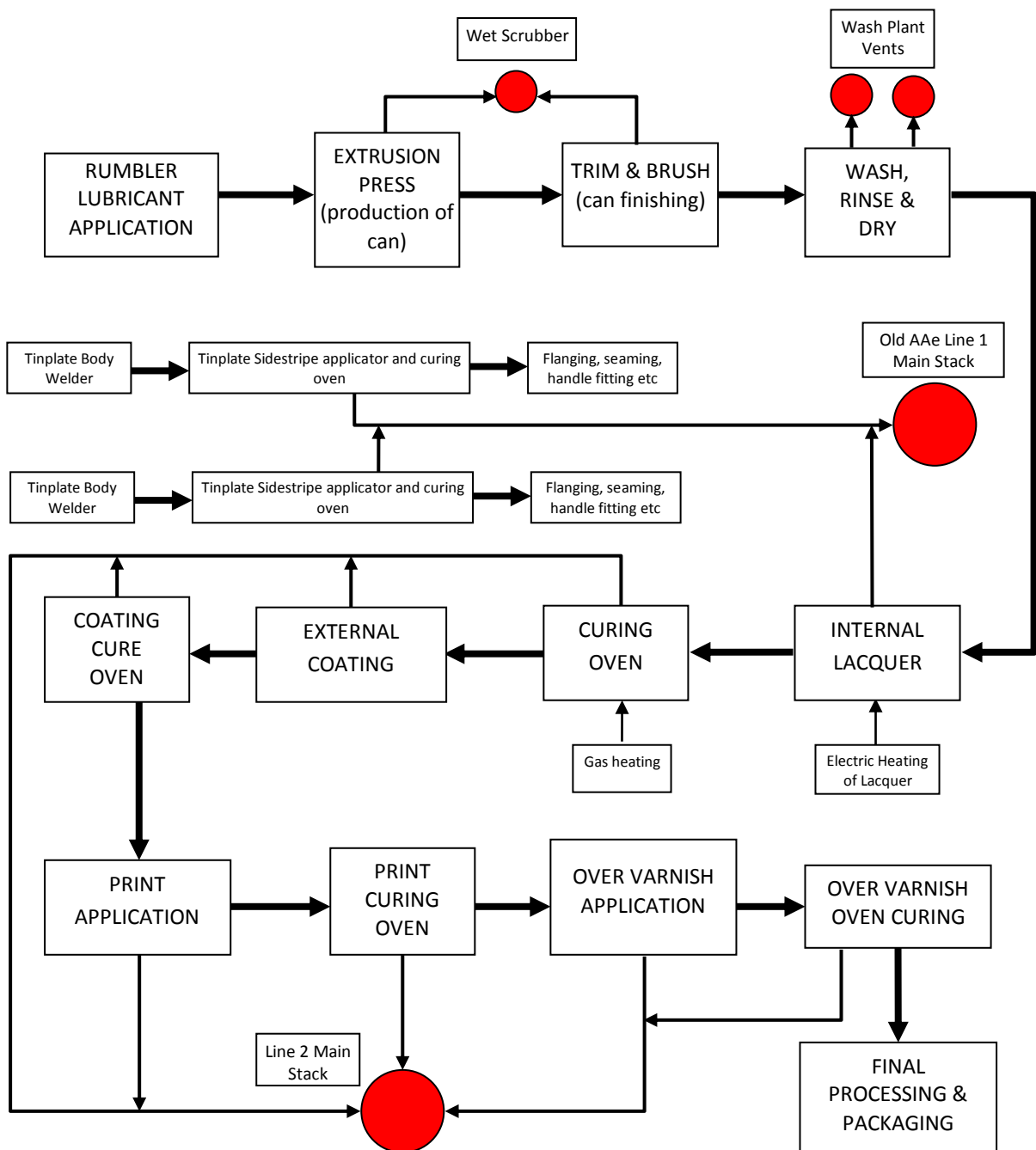
NCI Packaging Wellington EXTINGUISHER AND EVACUATION PLAN



Extraction and Control Equipment

AAe Line 1 has been decommissioned and therefore only Line 2 AAe line is operating now. In addition hoods have been added to the Tinplate side-seam lacquer curing heaters which are extracted to the Line 1 main stack. The internal lacquer process has a ventilation fan and filter system that now exhausts to atmosphere via Line 1 main stack (450 mm dia., 325 mm exit dia.) which extends 25 metres above floor level. One main extraction fan and ducting system collects the emissions from the curing ovens coating and lacquering processes of Line 2 and discharges via a 450 mm diameter flue (325 mm exit dia) which also terminates at 25 m above ground level. Figure 2 provides a schematic of the ventilation and stack configuration of the processes at the Wellington Plant.

Figure 2 Process Flow Diagram Line 2 AAe Including Tinplate Ventilation Configuration



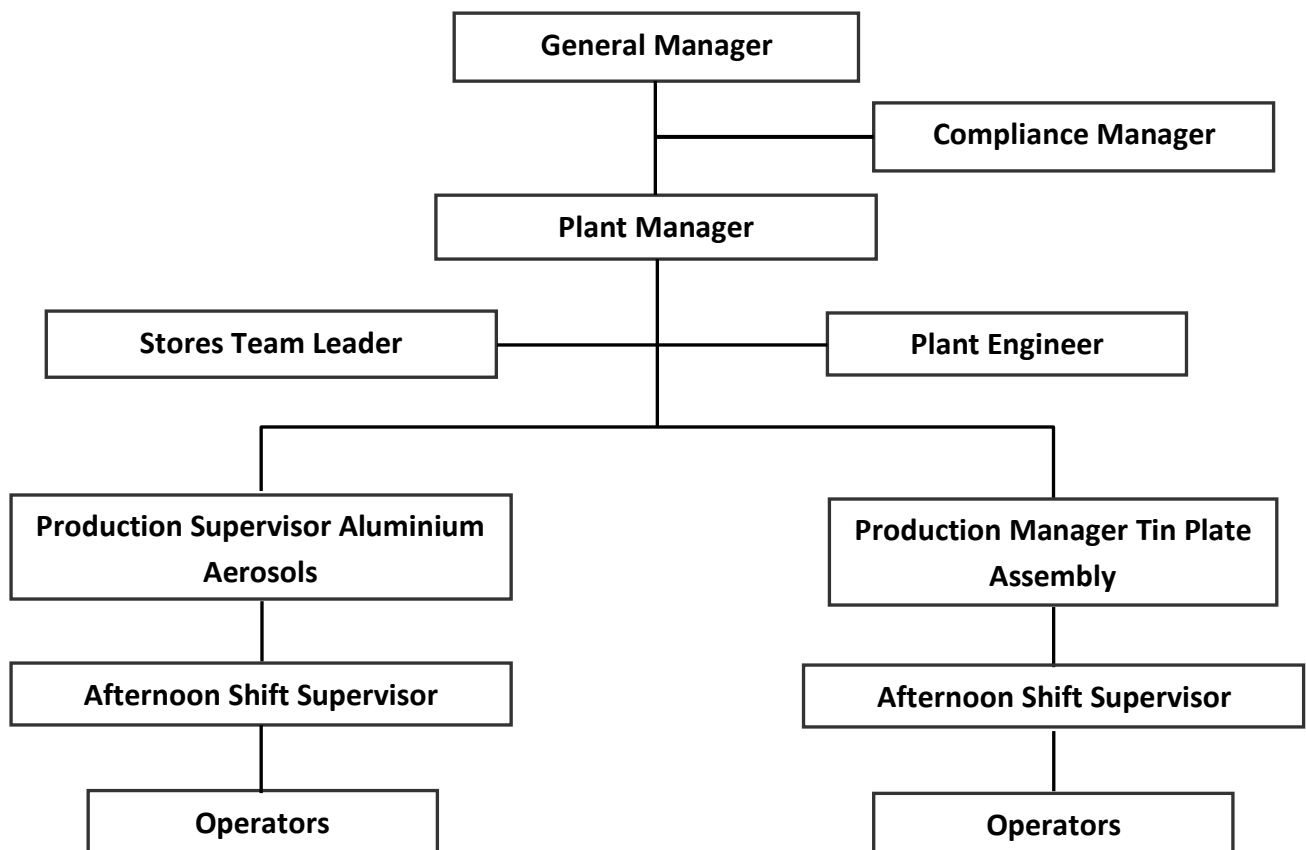
Staff Contacts and Responsibilities

It is the responsibility of the Plant Manager to monitor the daily operation of the plant and process. The Plant Engineer undertakes maintenance of all of the plants. Production employees advise the Plant Engineer on a daily basis via a morning meeting, or job request system, concerning maintenance requirements. The site also operates a preventative maintenance system.

The Plant Manager is responsible for the efficient operation of the manufacturing process. This monitoring includes responsibility for adhering to the requirements of the current air discharge permit.

All staff are trained so they are aware of the risks of environmental harm arising from the activities over which they have control, the legal standards of compliance they are to achieve and the penalties and consequences of failure. This training also covers waste minimisation, better use of resources and minimising risk to the environment. Training and retraining is recorded in the existing training register.

Figure 3 Site Staffing Structure



The key personnel dealing with air discharge consenting matters are:

- The Plant Manager, Shane Flitcroft, 027 683 4828;
- The Production Supervisor Aluminium Aerosols, Rajas Kumar 027 228 2696,
- The Plant Engineer, Mathew Flowers, 027 666 6105
- The Compliance Manager, Rhys Kevern, 09 9149447; and,
- General Manager, Mike Shatford, 0274 519 224

Each staff's responsibility is presented in Table 1.

Operation, Inspection and Maintenance

The manufacturing plant is maintained by the factory engineers (trade qualified) associated with each area by inspection and regular maintenance procedures as determined by the Total Preventative Maintenance (TPM) database. The main inspection activities are as follows:

1. The tinplate and aluminium extrusion lines both utilise Line 1 AAe main stack. Starting of any of the three processes connected to the main stack will start the main stack fan. The first action of the day for production personnel is to start the main exhaust fan and the internal lacquer machine fan. A pressure switch on the fan ducting activates a lamp to advise the fan is working.
2. The filter at the internal lacquer machine is regularly inspected for condition and cleaned by production personnel or by engineering staff if replacement is deemed necessary. The fan case is cleaned during preventative maintenance of the fan motor bearing.
3. The main fan consists of the centrifugal fan case, the impellor and shaft mounted on two plummer block bearings and driven by belts from the motor. The bearings and belts are inspected regularly as part of the preventative maintenance program of the plant.

Table 1 Staff Responsibilities

Staff	Action	Frequency	Record
Production	Check that fan starts 'under load'. This confirms that the motor and belts are operational.	At start up	Nil. Cease operation if the fan running lamp is not showing run mode
Production/ Engineering	Check and clean the filter at the internal lacquer machine and record this on the inspection sheet.	Bi weekly during change-over	TPM job
Engineering staff	Check the condition of the bearings and belts of the main fan, replace as necessary. Record the details on an inspection sheet or in the TPM database.	6 monthly	Engineering TPM system

The tradesman signs off their work except if a Maintenance Work Order has been necessary to rectify a problem.

General Compliance with Air Consent

The main requirements of consent compliance are discussed in the following sections.

Fugitive Emissions (odour)

The Plant Manager for aluminium aerosols has an overview of operations and reviews the level of maintenance of the building envelope. The main parts of the building that can be opened are the windows on the roof saw tooth, the windows on the upper levels of the west and east walls and the roller door on the north of the building. Periodic ambient monitoring of odour downwind of the plant is undertaken by the production manager or afternoon shift supervisor as well as response to any complaints that arise from the site. The amount of ventilation of the building relates to the internal temperature. In the winter the windows and doors are mainly kept closed. During hot periods in summer some ventilation is required and the easterly windows only are utilised to reduce the potential for off-site odour.

Summary of Actions

Table 2 summarises the frequency of actions that different staff members are required to undertake to ensure compliance with the site’s air discharge permit.

Table 2 Summary of Staff Actions

Staff	Action	Frequency
All staff	Be aware of odour emissions	At all times
Operators	Check that the process is being operated with the associated extraction and control equipment being fully operational.	Daily
	Check that the fume extraction ducting is free from leaks.	Daily
Plant Manager	Ensure that emissions are maintained at the minimum practicable level.	At all times
Plant Manager Compliance Manager	Train staff in the use of the spill kits.	Annually
	Record complaint and odour survey information on complaint forms/odour monitoring forms respectively.	Whenever a complaint is received
	Ensure that the plant is being operated and maintained in accordance with the AMOP.	At all times
Compliance Manager	Advise the Greater Wellington Regional Council of any complaints received.	As soon as possible but before the close of business on the next working day
	Prepare Communications Plan and newsletters	Quarterly for Newsletters
Site Engineer	Check spill kits.	Monthly
	Undertake inspections and maintenance on equipment.	As required by the preventative maintenance schedule

Complaints, Incidents and Investigations

Staff Responsibilities

Complaints should be reported to the Plant Manager in the first instance or if they are not available to the Production Supervisor. For the afternoon shift, complaints are directed to the Auckland office. An example of the complaints form is attached as Appendix A.

Complaints Recording and Investigation

The Compliance Manager maintains a record of any complaints received by the company. A copy of the form used to record the complaint details is held with the Plant Manager and Afternoon Shift Supervisor. Weather conditions will be noted once the details of the complaint have been recorded. The Production Manager (during the day shift) or Afternoon Shift Supervisor (during the afternoon shift) will investigate the complaint with assistance from the Compliance Manager as necessary, and will subsequently inform all relevant parties of the outcome of the investigation.

Follow up of actions and reporting to the GWRC is undertaken either by the Plant Manager or the Compliance Manager as appropriate.

Process Malfunctions

Process malfunctions or accidental discharges of contaminants into the air during dayshift hours are brought to the attention of the Plant Engineer or Plant Manager. The Shift Supervisor takes immediate corrective action. With attention to the personal safety of all staff and contractors on site, the manufacturing process may cease in a safe and orderly fashion, and equipment may need to be locked-out.

Approval to continue with production will be given once the Plant Manager is satisfied that the process is under control.

After normal dayshift hours the Afternoon Shift Supervisor has overall responsibility for the efficient running of the process and will take any required corrective actions in the case of a process malfunction or accidental discharge of contaminants into the air. The normal after-hours call-out process will be followed and responsible persons called as appropriate.

The Compliance Manager will contact the GWRC as soon as practicable, or at the latest the close of the next business day, with an incident report covering the cause of the incident and corrective actions taken.

All incidents involving a breach of consent, regulation or performance standard are reported as soon as possible to the Compliance Manager who will inform the General Manager for investigation and any necessary corrective action. These will also be discussed at the monthly management review meeting.

Contingency

This section outlines the contingency measures the company has developed to deal with unexpected occurrences.

Spill Response

All liquids are stored in the dangerous goods store which is suitably bunded. The necessary quantity for the day's production is all that the production supervisor will draw from this stock. There are spill kits held in the factory at various locations, and the staff are trained in their use. The kit's contents are checked every month by the Site Engineer to ensure supplies are maintained. Training in their use is provided by the Production Manager whenever required.

Fire Response

The factory has a fire alarm system and sprinklers in place. In the event of a fire the first duty is to evacuate personnel, and the site then is under control of the emergency services and the chief fire warden.

Air Controls Failure

If the extraction fans stop operating, the manufacturing line stops so that repairs could be made before the plant was started again.

Appendix A Complaint Form

ODOUR COMPLAINT NOTIFICATION

Today's Date: _____ Time odour was reported: _____

Date of Odour Incident (if not the same as above): _____

Time of Odour Incident (if not the same as above): _____

Odour Complainants Name (if provided): _____

Contact Phone Number (if provided): _____

Email Address (if Complainant would like a reply): _____

Describe Odour Incident: _____

Location of Odour: _____

Frequency and Duration of the Odour: _____

Strength of odour (on a scale of 1-10) _____

Description of the Odour (eg sweet solvent smell, hot metal, burnt train brakes etc):

NCI Production (were we running): _____ What were we running: _____

Any other additional Information: _____

Please Scan and forward to the Compliance Manager of the Auckland NCI office who will investigate and report to the GWRC. Alternatively just provide the information on an email.

Appendix B The Consent Conditions

General note for emailing notifications to Wellington Regional Council

The report or notifications can be emailed to notifications@gw.govt.nz. Please include the consent reference WGN110219 in the subject line, and the name and phone number of a contact person responsible for the discharge.

General conditions

1. The location, design, implementation and operation of the discharge shall be in general accordance with the consent application and its associated plans and documents lodged with the Wellington Regional Council on 31 January 2011, and further information received on:

- 12 August 2011 (response to further information request, report URS 2011b)
- 30 August 2012 (Changes to stacks as completed by 16 April 2012)
- 7 November 2012 (Notes of correspondence between NCI and Regional Public Health)
- 19 November 2012 (Report on unsuccessful trial of UV treatment)
- 15 January 2013 (Report URS 2013a on results of stack testing and dispersion re-modelling)
- 24 January 2013 (Report URS 2013c Odour survey report)
- 8 February 2013 (Report URS 2013b cc of memo from URS to Golders — further information request on report URS 2013a)
- 27 March 2013 (Report URS 2013d Updated modelling on stack extension up to 25 metres)
- 23 April 2013 (Proposed NCI Adaptive Management Strategy), and
- 29 April 2013 (Confirmation of completion of stack extension to 25 metres on 26 April 2013)
- 11 July 2013 (Conditions as proposed by NCI following meeting with GWRC on 9 July 2013)

Where there are contradictions or inconsistencies between the application and further information provided by the consent holder, the most recent information applies. In addition, where there may be inconsistencies between information provided by the consent holder and conditions of this consent, the conditions apply.

Note: Any change from the location, design concepts and parameters, implementation and/or operation may require a new resource consent or a change of consent conditions pursuant to section 127 of the Resource Management Act 1991.

2. The consent holder shall ensure that a copy of this consent and all documents and plans referred to in this consent, are kept on site at all times and presented to any Wellington Regional Council enforcement officer on request.

3. There shall be no discharges to air that are noxious, dangerous, offensive or objectionable at or beyond the legal boundary of the site property from which the consent holder operates, as determined by an enforcement officer of the Wellington Regional Council.

Note: For the purposes of this consent, the boundary of the property from which the consent holder operates is the outer perimeter of the land bearing the legal description Lot 1 DP 30717, Lot 1 DP 28552 and Lots 11-14 816 DP30232.

Investigation of Odour Mitigation Options

4. The consent holder shall undertake an investigation into technical options that can be used to minimise odour emissions from the site and which will form the basis for the Adaptive Management Odour Plan (AMOP) required by condition 5 of this consent. The results of this investigation shall be reported to the Manager, Environmental Regulation, Wellington Regional Council, by 6 February 2014.

On written application, the Manager, Environmental Regulation, Wellington Regional Council, may extend the timeframe for submission of the technical options report provided that the consent holder provides sufficient grounds to satisfy the Manager, Environmental Regulation, Wellington Regional Council that such an extension is warranted. Such application shall be in writing, prior to the due date for submission of the technical report.

Adaptive Management Odour Plan

5. The consent holder shall prepare and submit an Adaptive Management Odour Plan (AMOP) to the Manager, Environmental Regulation, Wellington Regional Council, for approval.

Purpose of the AMOP

The purpose of the AMOP is to ensure the consent holder has management procedures and practices to both proactively and reactively meet condition 3 at all times. This management plan must outline what measures the consent holder will undertake to prevent and/or respond to any breaches of condition 3 and/or notifications of odour occurring beyond the site boundary.

Note: It is the specific intent of this condition that the AMOP will function in the background at all times, and when specified "trigger conditions" occur, actions prescribed in the AMOP shall be initiated by the specified responsible person.

Without limiting the extent of the AMOP, it is expected that it will deal with the following:

- a) Procedures for incident notification to GWRC (Environmental Hotline 24 hour number: 0800496734) in accordance with condition 22
- b) Contact details of the person on site with the responsibility and authority to implement the provisions of the AMOP during plant operating hours
- c) Procedures for investigating any odour complaints received including:
 - i. Timeframes for initiating investigations
 - ii. Timeframes for responding to complainants
 - iii. How to review on-site meteorological data
- d) Procedures for undertaking both on-site and off-site odour assessments, including training procedures for staff
- e) Procedures for initiating actions that have the potential to reduce discharges to air, including proactive odour control measures
- f) Procedures for the review of meteorological and production conditions during complaints to assess whether there is any correlation between these conditions and the likelihood of there being a complaint
- g) On site responsibilities during odour complaints

- h) Procedures for modification of the AMOP following onsite identification of odour, including submission of updated AMOP to Wellington Regional Council

Development or review of the AMOP

6. The consent holder shall engage an independent technical expert, with specific experience and expertise in industrial odour discharges; to develop, or if developed by the applicant, complete a technical review of the AMOP prior to submission to the Wellington Regional Council.

The consent holder should incorporate all changes to the AMOP recommended by the technical expert. Where these are not adopted the consent holder shall provide to the Manager, Environmental Regulation Wellington Regional Council, detailed reasons why the recommendations have not been incorporated. A copy of the independent technical review shall be provided with the AMOP.

Submission of the AMOP for approval

7. The consent holder shall submit the final, technically reviewed, AMOP to the Manager, Environmental Regulation, Wellington Regional Council for approval, by **6 August 2014**.

On written application, the Manager, Environmental Regulation, Wellington Regional Council, may extend the timeframe for submission of the AMOP provided that the consent holder provides sufficient grounds to satisfy the Manager, Environmental Regulation, Wellington Regional Council that such an extension is warranted. Such application shall be provided, in writing, prior to the due date for submission of the AMOP.

Note. Nothing in this or any other condition precludes the consent holder submitting drafts of the AMOP to the Wellington Regional Council prior to the time frames specified in this consent.

Limitations to the approval of the AMOP

The approval of the AMOP by the Manager, Environmental Regulation, Wellington Regional Council in no way implies that the measures as specified in the AMOP ensures that the consent holder will meet condition 3. The approval is a technical approval only, and in no way absolves the consent holder from their responsibilities to manage the discharges to meet condition 3 at all times.

Limitations of the approval of the AMOP & investigations of odour incidents

In no way does this this plan, or the approval of this plan, authorise any breach(es) of condition 3 of this consent, nor will compliance with this plan mean that an investigation into any confirmed breach(es) of condition 3 will not be undertaken, or that enforcement action will not be undertaken even if the actions in the AMOP were undertaken as required.

Trigger conditions and timeframes for implementation of actions specified in the AMOP

8. The consent holder shall initiate the specified actions detailed in the AMOP:
 - a) Following receipt of a notification or complaint regarding odour discharged from the site (either received by GWRC or the consent holder directly); or

- b) Following formal notification by telephone, electronically or in person by a GWRC Enforcement Officer that an odour discharge from the site has been confirmed Offensive and/or Objectionable.

Source identification/investigation procedures & reporting

9. Following condition 8(a) of this consent being triggered or on written request by the Manager, Environmental Regulation, Wellington Regional Council, the consent holder shall prepare a technical report identifying the source/reason for the odour discharge. The report shall:

- a) Address the issues detailed in the request;
- b) Be submitted to Wellington Regional Council within the timeframe specified;
- c) Outline what measures were implemented and within what timeframes, and the effectiveness of the measures in mitigating the odour effects; and
- d) Specify what changes, if any, will be made to operating procedures, site practices and the AMOP to prevent/reduce the potential for similar odour events in the future.

Annual technical reviews of the AMOP

10. If the AMOP has not been otherwise reviewed during the previous 12 months as a result of a review required by conditions 5 or 9, the consent holder shall undertake a technical review of the AMOP. The review shall include but not be limited to:

- a) Frequency of incidents of Offensive and/or Objectionable odour events that have occurred (if any)
- b) Effectiveness of the AMOP in preventing, reducing and/or responding to incidents; and
- c) A technical process review/evaluation and the requirement for changes to:
 - i. The plant operating procedures and practices; additional procedures and practices recommended
 - ii. Changes to emission reduction/treatment equipment, including proposals for further equipment; and
 - iii. Timeframes for the selection, approval, procurement, installation and commissioning of the specified equipment

Where new, or changes to existing; emission reduction or treatment equipment are proposed, the consent holder shall have the proposed changes reviewed by an independent technical expert, with specific experience and expertise in industrial odour discharges.

The technical review, when required, shall be submitted to the Manager, Environmental Regulation, Wellington Regional Council by **30 August 2014 and every year thereafter**.

Amendments to the approved AMOP

11. Any proposed amendments or additions to the approved AMOP shall be submitted to the Wellington Regional Council for approval, and shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. Once approved by the Manager, Environmental Regulation, Wellington Regional Council, the approved AMOP shall become the

operative AMOP and the plant shall be operated in accordance with the approved AMOP at all times.

On-site meteorological station

12. The consent holder shall install, operate and maintain at least one meteorological station on the site, compliant with the New Zealand Standards listed below. The meteorological station(s) shall be situated in a location that is representative of site and sensitive receptor (residential) conditions. This weather station shall record the wind speed and direction in an appropriate format. The data shall be logged and available real-time via a website or other user accessible interface. Wellington Regional Council shall be given access to the real-time data upon request.

Note: There are 2 New Zealand Standards relevant to the meteorological site. Australian/New Zealand Standard AS NZS 3580,1.1:2007 Methods for sampling and analysis of ambient air Part 1.1: Guide to siting air monitoring equipment,

Australian Standard AS 2923:1987 Measurement of horizontal wind provides guidance on the measurement of wind speed and direction.

Operations and Maintenance Manual

13. The consent holder shall prepare and submit for approval to the Manager, Environmental Regulation, Wellington Regional Council, an Operation & Maintenance Manual (OMM) by 6 February 2014, or within another timeframe to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

The scope of the OMM shall include but not be limited to the following matters in order to minimise the discharge of contaminants:

- a) A summary of the plant purpose, location, layout, and manufacturing equipment with specific reference to contaminant discharge, extraction and treatment equipment, discharge stacks and processes, including responsibilities and contact details of key personnel
- b) Operation, inspection and maintenance of the manufacturing equipment, including the extraction and treatment equipment
- c) Procedures adopted to ensure that the extraction equipment is fully functional before manufacturing commences
- d) Procedures adopted to ensure that the plant complies with the conditions of this consent at all times
- e) Contingency plans in the case of accidents and emergencies, such as spills, fires, and incidents where the discharge of excessive contaminants to air was unavoidable; and
- f) Any other issues considered important, including:
 - Details of the general operation and maintenance of all emissions control equipment (including the associated ducting for this equipment)
 - Staff training on the process requirements, use of emissions control equipment, and emergency response
 - Details of how the building envelope is maintained to minimise the potential for fugitive emissions

The consent holder shall ensure that the OMM is consistent with the conditions of this consent, and shall be updated as required, with a copy forwarded to the Manager, Environmental Regulation, Wellington Regional Council within one month of any update.

Any amendments to the OMM shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

14. The consent holder shall, at all times, operate, maintain, supervise and control all processes and equipment on site to ensure compliance with the approved OMM required by condition 13 and pursuant to condition 3 and all other conditions of this consent.

Emission Control Equipment

15. The consent holder shall ensure that no part of the aluminium can manufacturing process is operated without the associated extraction being fully operational and functioning efficiently.

16. The consent holder shall ensure that the ventilation system shall draw adequate negative pressure to ensure the effective capture of contaminants from the aluminium can manufacturing process and all other areas from which air is extracted to ensure that fugitive emissions are minimised.

17. The point of discharge from the main and lacquer stacks shall terminate at a point no less than 25 metres above ground level. The stacks shall be designed and operated to ensure the uninterrupted vertical discharge of vapour.

The stacks shall have the following diameters at the point of exit:

Stack / Parameter	Line 1 Main Stack (No.11)	Line 1 Lacquer Stack (No.9)	Line 2 Main Stack (No.1)	Line 2 Lacquer Stack (No.0)
Diameter at exit m	0.325	0.15	0.325	0.15

Source URS 2013d dated 22 January 2013 Table 2-1 Emission Monitoring

18. There will be no routine emission monitoring requirement for this consent. However, **on written request** by the Manager, Environmental Regulation, Wellington Regional Council, **the consent holder shall conduct an emissions testing programme for odour or Volatile Organic Compounds likely to be discharged from the plant, within two months of the written request.** The emissions testing programme and report shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

Note: The Manager, Environmental Regulation, Wellington Regional Council, will consult with the consent holder prior to such a request for any additional emissions testing programme(s).

19. All sampling techniques employed in respect of the conditions of this consent shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. All analyses shall be performed by an International Accreditation New Zealand (IANZ) registered laboratory or

otherwise as specifically approved by the Manager, Environmental Regulation, Wellington Regional Council.

Emission analysis and reporting

20. Where monitoring indicates that discharges are 10% greater than those in the application (URS 2013d: URS Memorandum dated 22 January 2013 "*Further Assessments of Stack Height Changes on Ambient Odour Concentrations*", received by Wellington Regional Council on 27 March 2013); the Manager, Environmental Regulation, Wellington Regional Council may require further analysis and interpretation based on the emission testing results, including computer dispersion modelling and comparison with relevant guidelines.

Within a timeframe as agreed with the Manager, Environmental Regulation, Wellington Regional Council, the consent holder shall submit a report containing the results and analysis of the emissions testing programme to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. The report shall contain the results of the emission test, including all relevant plant operating parameters and conditions, and all calculations and assumptions. The report shall contain data analysis and interpretation by a suitably qualified and experienced person.

Note 1: A 10% increase from those in the initial report are consistent with the National Environmental Standards for Air Quality 2004,

Note 2: This condition may be altered following a request under section 127 of the Act provided the effects are no more than minor and consistent with the original application.

Complaints record

21. The consent holder shall maintain a record of any complaints received alleging adverse effects from or related to the discharge the subject of this consent. This record shall include:

- a) The name and address of the notifier (if provided)
- b) The date and time that the notification was received
- c) Details of the alleged incident
- d) Weather conditions at the time of the incident
- e) The most likely cause of the incident, and
- f) Any measures taken to mitigate/remedy the cause of the incident and address the complaint

A copy of this record shall be sent to the Manager, Environmental Regulation, Wellington Regional Council as soon as possible, or at the latest the close of business the next working day.

This record shall be maintained for the duration of this consent and made available to the any enforcement officer of the Wellington Regional Council, on request.

Note 1: The Wellington Regional Council will notify the consent holder as soon as possible about any odour notifications received that are attributed to the consent holder.

Note 2: Incidents involving odour are reported under condition 9 of this consent. The intent of this condition is to capture any other environmental incidents that may occur.

Incident Reporting

22. Any incident that may result in adverse effects on the environment beyond the boundary of the consent holders site shall **be notified to the Manager, Environmental Regulation, Wellington Regional Council as soon as possible, or at the latest the close of business the next working day**. A written report shall be submitted to the Wellington Regional Council within five working days with reasons for the incident, and measures taken to mitigate the effects of the incident and prevent a recurrence.

Note: The Wellington Regional Council may also investigate any incidents to determine if a breach of this consent or the Resource Management Act 1991 has occurred and may also undertake enforcement action depending on the circumstances.

Communications Plan

23. The consent holder shall prepare a communications plan, which sets out how it will liaise with the local community. This plan shall be submitted to the Manager, Environmental Regulation, Wellington Regional Council by **6 November 2013** and will include but not be limited to:

- a) A dedicated telephone number (hotline) for neighbours to contact the consent holder during day shift hours
- b) A dedicated telephone number for neighbours to contact the consent holder after 4 pm.
- c) Preparation and distribution of a quarterly newsletter

The consent holder shall ensure that the communications plan is reviewed on six monthly basis to ensure the needs of the local community are being met. The consent holder shall provide a report to the Manager, Environmental Regulation, Wellington Regional Council within one month of a review being undertaken which shall include:

- How the review was undertaken
- Feedback provided by the community, and
- Any changes to the communication plan

The report shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

Reporting Conditions

24. The consent holder shall submit an **Annual Report** to the Manager, Environmental Regulation, Wellington Regional Council by **31 July each year** for the period 1 July — 30 June inclusive. The report shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council, and shall contain, but not be limited to:

- Details of significant maintenance or upgrade items where relevant to the discharge of contaminants or treatment of emissions,
- Any technical reviews undertaken relating to the AMOP,
- Complaints received and actions implemented by the consent holder to minimise effects (if any),

- Details of production information, including volumes of materials used per annum, and
- Any other information considered relevant

Review Condition

25. The Wellington Regional Council may review any or all conditions of this consent by giving notice of its intention to do so pursuant to section 128 of the Resource Management Act 1991, at any time within three months of the 30 June each year for the duration of this consent for the purpose of:

- a) To review the adequacy of any report and/or monitoring requirements, and if necessary, amend these requirements outlined in this consent
- b) To deal with any adverse effects on the environment that may arise from the exercise of this consent; and which are appropriate to deal with at a later stage, or
- c) To enable consistency with any relevant Regional Plans or any National Environmental Standards or Regulations
- d) To adopt the best practicable option to remove or reduce any adverse effect on the environment.

The review of conditions shall allow for the deletion or amendment of conditions of this consent; and the addition of such new conditions as are shown to be necessary to avoid, remedy or mitigate any significant adverse effects on the environment.

Notes

- a) A resource management charge, set in accordance with section 36(2) of the Resource Management Act 1991 shall be paid to the Wellington Regional Council for the carrying out of its functions in relation to the administration, monitoring, and supervision of resource consents and for the carrying out of its functions under section 35 (duty to gather information, monitor, and keep records) of the Act.
- b) The Wellington Regional Council shall be entitled to recover from the consent holder the costs of any review, calculated in accordance with and limited to the Wellington Regional Council's scale of charges in force and applicable at that time pursuant to section 36 of the Resource Management Act 1991.