

Delmore Fast-Track

25/06/2025 – Auckland Council Response

Annexure 10:

Air Discharge

Louis Boamponsem

Technical Memo:

Air Discharges

20/05/2025

To: Carly Hinde, Principal Project Lead, Planning and Resource Consents Dept.

From: Louis Boamponsem, Senior Specialist – Contamination, Air and Noise

Subject: BUN60444768: Air Quality Review for development at Orewa (Delmore)

I have reviewed the AEE and supporting information submitted for resource consent application BUN60444768, with respect to the actual and potential air quality effects of the proposal and the provisions of the:

- *Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (NES:AQ)*
- *Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023 (NES:IGHG)*
- *Auckland Unitary Plan (Operative in Part), Chapter E14: Air Quality (AUP(OP)).*

The documents I have reviewed are:

- Delmore Fastrack Approval Application – Assessment of Environmental Effects (AEE), prepared by B&A Consulting Limited, 17/2/2025
- Appendix 15: Site Plans
- Appendix 22 Delmore Fast-track - Proposed Consent Conditions
- Appendix 23: Rules Assessment
- Appendix 31: Vineway Limited – Technical assessment of discharges to air from proposed wastewater treatment plant – Delmore, Orewa (AQR)

Introduction and proposal

I understand that the Proposal, as relevant to air quality involves:

- the transformation of 109.18 hectares of Future Urban Zone land at 88, 130, 132 Upper Ōrewa Road and 53A, 53B & 55 Russell Road, Ōrewa, into a planned residential development of approximately 1,250 dwellings, plus one superlot, supporting infrastructure (roads, stormwater, wastewater, water supply, power, fibre), open spaces, ecological restoration and the delivery of the regionally significant NoR 6 arterial road. The applicant Vineway Limited ('Vineway') has proposed a new Wastewater Treatment Plant (WWTP) to service the Delmore housing project. The WWTP will treat municipal wastewater and is designed as a temporary solution until public wastewater infrastructure upgrades are completed by 2031. Potential odour from the WWTP is also a primary air discharge concern.

I recommend that the consent application can be granted subject to conditions similar to those proposed at Appendix 21 of the AEE (detailed at the end of this memo). The reasons for this recommendation are:

- I consider the AQR has been prepared by a suitably qualified and experienced air quality practitioner in accordance with best practice guidance to appropriately assess the site's air discharges and resulting adverse effects.
- I agree with the conclusions of the AEE and AQR, that the Site's air discharges are not likely to cause significant adverse effects at any location beyond the Site boundary.
- The AQR's assessment includes FIDOL that I consider has been undertaken by a suitably experienced specialist with adequate regard to the recommendations of the Good Practice Guide for Assessing Discharges to Air from Industry (GPG:Industry, Ministry for the Environment, 2016), and other relevant guidelines.
- Discharges of odour from the proposed Wastewater Treatment Plant (WWTP) are not likely to cause significant amenity effects:
 - Discharges of odour are not likely to cause 'offensive or objectionable' effects at any location outside of the site boundary, given the likely level and character of these discharges (refer to the 'FIDOL' assessment at Table 3 of the AQR).
 - The risk of abnormal discharges of odour can be adequately controlled and/or remedied by adherence to the proposed mitigation measures and consent conditions.
- Discharges of dust from all phases of the project's construction are not likely to cause significant amenity effects if controlled in accordance with the proposed measures in the AEE:
 - An appropriate Construction Management Plan (CMP) with a range of measures to control and minimise discharges of nuisance dust is proposed by Vineway. The AEE suggests these measures will adequately incorporate the best-practice recommendations of the *Good Practice Guide for Assessing and Managing Dust* (Ministry for the Environment, 2016).
 - I concur with the applicant that the project's air discharge mitigation strategies, together with the adoption of the proposed consent conditions, will ensure air quality effects remain within acceptable limits, consistent with both the Auckland Unitary Plan (Operative in Part) E14 provisions and the National Environmental Standards for air quality.

Applicant's proposed consent conditions

(124) Prior to the commissioning of the WWTP, an Air Quality Management Plan (AQMP) must be submitted to the Council for **certification**, to confirm that the activities undertaken in accordance with the AQMP will achieve the objectives of the plan and compliance with the relevant WWTP consent conditions. Any subsequent review of the AQMP must also be submitted to the council for **certification**. The consent holder must meet the costs of the production, **certification**, monitoring and review of the AQMP.

The AQMP may be a sub-section of a wider Wastewater Treatment Plant Management Plan, and must incorporate a series of monitoring, management and operational procedures, methodologies and contingency plans, and together shall accurately record all information required to comply with the conditions of this consent. The AQMP must include the following:

- a) Identification of all point sources for discharges of contaminants into air, including a map and schematic diagram showing the location of each source;
- b) Procedures to minimise discharges of contaminants into air (including odour), including details of the inspection, maintenance, monitoring and contingency procedures in place for the waste water treatment plant.
- c) The operating parameters of odour control equipment and the frequency and scope of the regular checks to be performed on emissions control equipment; including testing of the carbon bed saturation;
- d) Procedures for the monitoring of odour, including details of inspection procedures, recording requirements and contingency measures;
- e) The identification of staff responsibilities;
- f) The procedures for the receipt, recording and handling of air quality complaints received.

(125) The AQMP must be reviewed on an annual basis and any subsequent changes to the certified AQMP must be submitted to the council for certification prior to implementation. The council will advise the Consent Holder in writing if any aspects of the AQMP are considered to be inconsistent with achieving the provisions of this consent.

Advice Note: The council acknowledges that the Air Quality Management Plan is intended to provide flexibility both for the consent holder and the council for the management of the air discharges. Accordingly, the Air Quality Management Plan may need to be reviewed over time. Any reviews should be in accordance with the stated objectives of the management plan and limited to the scope of this consent.

Limit Conditions: Air Discharges

(126) All processes associated with the WWTP must be operated, maintained, supervised, monitored and controlled in accordance with the Air Quality Management Plan in accordance with Condition 124 to ensure that all emissions authorised by this consent are maintained at the minimum practicable level.

(127) Discharges of contaminants into air from the site must not cause:

- (a) Odour that are noxious, dangerous, offensive or objectionable effect beyond the boundary of the Site, in the opinion of an enforcement officer.
- (b) Visible emissions (other than water vapour/steam or heat haze) that cause a dangerous, offensive or objectionable effect, in the opinion of an enforcement officer.

Advice Note: Air discharge limits

Condition 127 is to be assessed by suitably trained council enforcement officers in accordance with the procedures outlined in the Good Practice Guides for Odour (Ministry for the Environment, 2016), including consideration of the FIDOL factors (frequency, intensity, duration, offensiveness and location) for amenity effects (dust, odour and visible emissions).

Process Conditions

(128) Within one month of WWTP commencing treatment, the Consent Holder must provide to the Council a report from an appropriately qualified person, which verifies that the design and installation of the wastewater treatment plant and odour control system (including the odour extraction and treatment system) in accordance with Conditions 129.

(129) Air discharges from the solids screening and storage and sludge dewatering and storage must be extracted to an emission control system (including an activated carbon scrubber) and discharged from a stack at least 3m above ground level or the apex height of the nearest building within 20 meters, without obstruction of the vertical discharge of air.

Monitoring and Reporting Conditions

(130) Within 3 months of exercising this resource consent, the consent holder **shall**: (a) Operate and maintain a weather station on the site to measure and record the air temperature, wind direction and wind velocity on a continuous basis (at no less than 10-minute intervals). The weather data **shall** be retained for at least the duration of the resource consent.

- a) (b) Weather data of any period **shall** be provided to Auckland Council within 5 days of a request.
- b) (c) The weather station **shall** be located on the site in a location which, as far as is practicable, is unaffected by surrounding structures or vegetation or other features for the purpose of ensuring the most accurate measurements as practicable on the site.
- c) (d) The weather station **shall** be installed and operated in accordance with AS/NZS 3580.14:2014 (Methods for sampling and analysis of ambient air - Meteorological monitoring for ambient air quality monitoring applications).

(131) The Council must be notified as soon as practicable in the event of any significant discharge to air, which results or has the potential to result in a breach of air quality conditions or adverse effects on the environment. The following information must be supplied:

- a) Details of the nature of the discharge including any wind conditions as recorded under conditions 10 during the incident timeframe.
- b) An explanation of the cause of the incident.
- c) Details of remediation action taken.

Advice Note: Significant discharges to be notified to council in accordance with this condition include abnormal discharges arising from unexpected failures of the WWTP (including emission control systems). An email to monitoring@aucklandcouncil.govt.nz should be sent detailing the nature of the issue and what contingency measures are to be implemented to minimise potential air quality effects.

(132) All air quality complaints that are received must be recorded and if requested by Council, provided to Council within one working day of the complaint. The recorded complaint details must include:

- a) The date, time, location and nature of the complaint.
- b) The name, phone number and address of the complainant, unless the complainant elects not to supply these details.

- c) Weather conditions, including wind speed and direction, at time of the complaint.
- d) Any remedial actions undertaken.

*'Shall' in condition (130) could be changed to 'must'

*'Certification' inserted in condition (124) as per the AQR

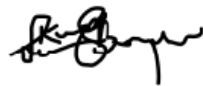
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Date:

20/5/2025