

NCI Packaging (NZ) Limited.

Supplementary Evidence of Jeffrey Bluett:

- **Summary of Evidence in Chief; and**
- **Review of the Applicant's Evidence.**

1. Introduction

The Minute and Directions of Hearing Commissioners, J Iseli and T Nash dated 26 July 2021, requested that witnesses prepare a brief written summary of their Evidence in Chief. My Evidence in Chief is presented in full in Appendix 1 of Ms McClintock's S42a report. This Supplementary Evidence presents a summary of my:

- Evidence in Chief; and
- Review of the Applicant's hearing evidence.

2. Summary of Evidence in Chief

The purpose of my evidence was to address the applicant's assessment of health and odour impacts of the activity being undertaken on the site. The key findings contained in my evidence are:

- The applicant has provided a comprehensive and robust description of the processes undertaken, the type and amount of contaminant discharged into air from the site, and the method of discharge;
- The two key potential adverse effects of the VOC contaminants discharged from the site are human health impacts and odour amenity impacts);
- NCI acknowledge the sensitivity of the receiving environment and potential impact of odour discharged from the site;
- The health effects of the discharge of VOCs and combustion products will be less than minor, while the discharge of odour on occasions may cause effects than are minor or more than minor.
- In my opinion a cumulative odour effect is occurring in the area and is most likely being caused by either repeated impacts from NCI, or the odour generated by multiple sources causing repeated incidents at a particular location.
- T+T's evaluation of the odour observation data indicates that solvent type odours are likely to be occurring at sufficient intensity, frequency

and duration to constitute an odour nuisance particularly around the end of Mountbatten Road (adjacent to the NCI site).

- I consider the odour emission monitoring undertaken by NCI has provided useful information for NCI's odour mitigation planning as it clearly identifies the key sources for odour treatment that would contribute to reduced impacts offsite.
- I conclude the proposed two stage approach to odour mitigation will certainly reduce the frequency, intensity and duration of adverse odour effects that currently occur in the area around the site. I consider that the odour effects caused by NCI are likely to fall to an acceptable level once the proposed staged mitigation has been implemented.
- I have reviewed the submissions made on the application and have addressed the key issues raised by the submitters. None of the issues raised in the submissions have changed my findings and/or recommendations on this application.
- GWRC staff and I reviewed NCI's proposed set of consent conditions and have agreed upon a number of suggested amendments.

3. Supplementary Evidence - Review of Applicant's Hearing Evidence

I have reviewed the NCI Evidence of:

- Shane Flintcroft, (Manager NCI Upper Hutt Plant), 26 July 2021;
- Rhys Kevern, (Plant Chemist and Compliance Manager for NCI), 26 July 2021; and
- Jennifer Simpson, (Technical Director, Environmental Engineering Tonkin and Taylor), 26 July 2021.

Having read the NCI evidence, I consider there is good agreement between the evidence presented by NCI and GWRC on the conclusions of the respective assessment and review. Mr Kevern notes (Paragraph 43) that he considers *"the Officer's report is a fair assessment of the application and concerns raised by submitters"*. Ms Simpson notes (Paragraph 7.1) that she *"is in agreement with the overall finding of the Officer's Report that adverse effects of odour from the site can be appropriately managed and mitigated through consent conditions"*.

Each of the three NCI witness suggest a number of changes to the draft consent conditions. I am in agreement with the majority of the suggested changes. However, there are three minor points over which there is a disparity between the applicant's suggestions and my views. These three unresolved points are highlighted and discussed below.

Mr Flitcroft suggests that the community liaison group needs to meet no more frequently than every 12 months. It is my view that the community liaison group, should meet twice in the first year. After the first year when the proposed mitigation has been implemented, the community liaison group should then decide if once a year is sufficient or if they want to continue with 6 monthly meetings. In my experience, if there are no or infrequent odour events occurring, an annual meeting has met the requirements of the key stakeholders (in this case NCI and the community).

In paragraph 5.5 of Ms Simpson's evidence, she defines one of the potential stage two odour mitigation measures as raising the height of the Internal Lacquer Assembly Stack by 2 m. From my review of the odour emission measurements made in 2018 and 2020 there appears to be some uncertainty of which part of the process will have the highest odour discharge rate after the basecoat application and oven emission sources are ducted to the biofilter. It is my view that if the stage 2 odour mitigation of raising the stack height is required, then the stack increase should occur on the stack from which has the highest remaining rate of odour discharge, which may or may not be the Internal Lacquer Assembly Stack. This detail should be covered off in the Adaptive Management Odour Plan (AMOP).

In paragraph 6.3 of Ms Simpson's evidence, she suggests an amendment to condition 16. My opinion is that Ms Simpson's suggested amendment to condition 16 is helpful in simplifying and adding clarity to the condition. Ms Simpson also suggests an amendment (underlined text) to the note which accompanies condition 16.

Condition 16: Note: Odour generating activities not captured by the extraction system are defined in the AMOP.

This is a useful amendment, but I suggest a minor addition (bold text below – “**including those**”) is made to the note as detailed below. This addition will ensure that that all odour generating activities, not just those not captured by the extraction system are defined in the AMOP.

Condition 16: Note: Odour generating activities **including those** not captured by the extraction system are defined in the AMOP.

4. Conclusion

In conclusion, I note that there is very good agreement between the applicant and GWRC in regard to:

- The conclusions from the assessment of health and odour impacts; and
- The draft consent conditions.

In my opinion, the small number of remaining issues (as detailed in Section 3) are not significant and should be able to be resolved between the applicant and GWRC. If this is the case then, my view will align with Mr Kevern and Ms Simpson's conclusions, that the adverse odour effects from the site can be appropriately managed and mitigated through consent conditions.

A handwritten signature in black ink, reading "Jeff Bluett". The signature is written in a cursive style with a long horizontal stroke at the end.

Jeff Bluett

29 July 2021