

File No: WGN190198 [36059]

4 November 2019

Minutes from the Pre-Hearing Meeting for NCI Packaging NZ Ltd's application for a discharge to air permit relating to the production and coating of aluminium aerosol cans and tin plated steel cans

Held: 21 October 2019 at 6:30pm

Location: NCI lunch room, 62/66 Montgomery Cres, Clouston Park, Upper Hutt 5018

Attendees: Rhys Kevern (Technical & Compliance Manager) and Shane Flitcroft (Plant Manager),

NCI; Jude Chittock, Claire Baldwin (processing officer), Rachael Boisen Round and Josh Martin, GWRC; Jill McKenzie, Regional Public Health (Submitter); Ann Devlin (Submitter); Glenys Check (Submitter); Trevor & Dianne Messer (Submitter); Dorothy

Pink and Nicola Ratahi (Mountbatten Grove residents).

1. Introduction

Rachael opened the meeting by explaining the meeting as an informal discussion of which the main purpose was to have a chance to talk through the issues. Shane explained the emergency procedures and location of facilities.

Attendees went around the circle to introduce themselves. GW and NCI staff explained their position in the organisation and responsibilities with the consent. Submitters and other attendees introduced their matters of concern and issues they would like resolved.

2. Summary of the discussion of issues

Odour

Residents all reported a strong odour which they were sure came from NCI. Solvent-type smell which has been ongoing for 12 years. Residents often unable to go outside and forced to close windows. Only noticed odour on weekdays – Shane confirmed the maximum operating hours were 6am to 11pm week days only, but often 6am-6pm normal.

No regular consistency to odour events. Residents agreed that is problematic when wind is still or light and low cloud conditions, noted that the wind swirls against hills to south also. Residents said the odour duration has changed over time - mostly comes in short bursts <10mins, rather than all day like it used to.

Residents agreed that they have noticed an improvement in the odour following NCI's extension of the stack height (around the time of the last resource consent application). Nicola noted that she thought the stack height extension wasn't a good idea as the emissions were now just spread over a bigger area. Shane also confirmed that, around the same time as the stack extension, NCI reconfigured the plant to running one line (reduced from two lines) due to operational requirements.

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History – Ann stated she and Dorothy have lived on Mountbatten Grove for 46 years. The residential area was originally built for employees of the match-making factory that occupied the NCI site. Therefore it wasn't a historical town-planning issue that resulted in residential areas so close to industrial plants. Ann said there was never any problems with odour until NCI moved into the site 12 years ago.

Group discussion around the cumulative effects of other potential odour sources in this location. NCI doesn't accept that they are directly responsible for the odour, despite resident's insistence that NCI is the cause. Several organisations in the surrounding area discharging similar emissions (some as a permitted activity) e.g. Resene, Wedgelock plus smaller car painting/body shops etc.

Alternative options for odour management

Residents consider that NCI is not testing their emissions enough. Analysis from current test not trusted by residents as odour has been ongoing for 12 years despite changes to stack height.

We discussed whether the emissions can be tested to identify specific molecules that might cause odour. Rhys explained the bag testing procedure and that it is difficult to predict odour levels by monitoring a group of different individual chemicals as each individual chemical has a different odour threshold (the lowest concentration where someone can smell it).

Discussed other alternatives e.g. afterburner which Rhys said wouldn't be efficient for the small amount of emissions from the plant. He explained further that the afterburner option (as explained in the application) costs up to \$50,000/year in gas to run it, literally burns the extracted air before discharge into air, and wasn't positive that it would make any difference to odour.

Shane explained that NCI undertook half-hourly quality control check of the ovens and the coating amounts was highly controlled to ensure only the very minimum amount is used.

Jill raised whether fugitive emissions could potentially be adding to the odour problem e.g. roller doors being opened. Rhys didn't think so as the extraction systems on the machines reduce the concentrations of solvent vapours inside the building and if this low level did escape the door it would get further diluted before reaching the neighbours. Rhys said he thought changes in the level of emissions were unlikely throughout the day due to the constant manner of the coating/curing processes i.e. once the line has been switched on, it continues at a constant level all day, without changes.

Residue on houses/fruit/soil

Grey bloom/dust particles staining residential properties adjacent to the boundary fence with NCI (i.e. Trevor & Dianne; Ann stated she didn't have this problem on her house). Stains are hard to remove, even with water blasting. Glenys stated she had someone from NCI (Mike?) bring a chemist to her house in 2012 after she complained about this residue to NCI.

Discussion about whether this residue could come from NCI – Rhys said no as their emissions are gases only, not particulate matter. Residents also concerned about these particles being on fruit trees and in their soil.

Suggestion for a vegetative buffer along the northern boundary of NCI to form a buffer to houses. Ann raised that there might be a potential issue with the roots disturbing fence foundations. NCI were not sure if this would make any difference and Rhys said even if it was planted it would take several years to establish. To be confirmed/discussed further.

Potential health effects

Glenys' son-in-law who worked in her garden and painted her house (over a period of approximately 9 months) became ill with cancer and tests showed lung damage, no evidence that it was linked to NCI's discharge, inconclusive. Also history of breast cancer and thyroid issues among attendees.

Discussed the workers' health and safety within NCI; Shane stated no problems due to extraction of air from plant.

Claire pointed out that Volatile Organic Compounds (VOCs) in the emissions testing supplied with the application were well below the guidelines used in NZ. Some discussion regarding whether relevant to use US guidelines; Claire explained we only use the US guidelines when there are no relevant guidelines provided by NZ Ministry of Health or Ministry for the Environment.

Odour notification and response

Residents felt that reporting odour to GWRC made no difference and doesn't lead to any solutions. Discussion around the challenges and limitations to GW's odour response procedures, especially regarding the short burst duration of strong odour and delay in getting the notification through from GWRC call centre.

Residents encouraged to call the GWRC environment hotline as soon as they smell a strong smell. GWRC explained that if no notifications are received, issues remain unknown and can't be recorded. NCI staff have admitted to smelling odour in the past. Suggestion that GWRC investigate other sources of odour also – Claire confirmed this had been done, but was open to looking into it again.

3. Agreed actions:

- Residue/deposits on neighbouring houses need to be linked back to source. Claire to follow up
 re: possibility for binding of gases with particulate matter from background sources (e.g.
 woodburners); whether can test this to confirm source. Claire to check fence between factory
 and residential houses to see if deposits are visible. Agreed that Claire, Rhys and Shane would
 visit Trevor and Dianne's house the next morning to see residue.
- GW to check current incident notification system and review the site-specific odour response protocol for NCI. Claire to test all incidents like this make it to the GW duty officer.
- Residents are willing to trial a text/notification system for reporting odour and encouraged to keep reporting incidents at the time of occurrence.
- Further investigation needed to identify and assess other potential sources of odour (suggestion of proactive monitoring by GWRC).

• Further discussion required regarding proposed consent conditions, especially regarding emissions testing, investigating alternatives.

4. Next steps

Rhys asked the submitters whether they still want to be heard at a hearing or whether they wanted to see draft consent conditions. Rachael explained that we also have the option of gathering the additional information that has been requested or raised tonight, and could possibly hold another meeting to discuss at a later date. Ann agreed that addressing the questions and actions first would be preferred. Jill confirmed that RPH would want to see the draft conditions.

GWRC and NCI thanked everyone for their attendance and closed the meeting at 8:30pm.