

RE: Follow up: PYROLYSIS TRIAL Resource consent RM22-0076-AP
Oct 25, 2024, 10:08 AM

Reuben Fraser <Reuben.Fraser@boprc.govt.nz>

Tēnā korua Valerie and Sue,

Thank you very much for this letter, and I apologise that you did not receive a response to the initial letter.

Your first letter was tabled and discussed at the Monitoring and Operations Committee meeting on 11 June. Staff advice to Councillors was that the letter raised issues that should quite rightly be considered as part of any consent application beyond the trial period.

In relation to the second letter, the pyrolysis trial has concluded, the plant is not currently operating and the resource consent expires at the end of this month. No new applications have been received by BOPRC for this activity to date. Any future applications will be publicly notified if the activity will have adverse environmental effects that are more than minor.

BOPRC's compliance team has received the sampling results for the air emissions testing which do show that CO, Cr and Ni were over the limits set in the consent. We are currently awaiting the submission of the final report interpreting the data and the modelling update as per conditions 7.4 and 7.5 before we send the data for technical review by an air quality scientist and complete the final comprehensive assessment of compliance against the consent. Once this compliance assessment is complete we can share it with you.

Regarding the 'discrepancies' you have noted in relation to compliance reports, these are explained in more detail as follows:

- 12 April 2024 – all conditions assessed during the inspection were complying at the time. The plant has two reactors that can be operated under the trial, only one was operating during the inspection.
- 30 May 2024 – compliant with condition 7.1 which requires stack testing to be carried out. This compliance assessment comment relates to condition 7.1 only.
- 12 June 2024 – not assessed rating given as the plant was not operating; construction was occurring on aspects of the plant which was undergoing maintenance and adjustments.
- 9 September 2024 – a low risk non-compliance rating was assigned due to records not being supplied yet. This was an administrative assessment of record submission only.

I note your concerns with the time delay between emissions testing taking place in May/June and the test results being received by BOPRC in September, however condition 7.2 requires that the consent holder submit data within 10 working days of the sample results being received by the consent holder. The consent holder did not have the results from their emission testing provider any earlier, so despite our requests, they were unable to provide the results.

I appreciate you taking the time to set out your concerns with the pyrolysis process and waste incineration proposals so clearly and would be happy to discuss this with you further if you would like to give me a call.

Ngā mihi,

Reuben

Reuben Fraser

Tumu Whakarite Ture - General Manager Regulatory Services

Bay of Plenty Regional Council Toi Moana
