

BEFORE THE TARANAKI REGIONAL COUNCIL

IN THE MATTER

of an application by Remediation (NZ) Limited for resource consents under Part 5 of the Resource Management Act 1991

AND

IN THE MATTER

applications to obtain replacement consents for Consent Numbers 5838-2.2 and 5839-2 as summarised below:

Consent 5838-2.2 – to discharge of a) waste material to land for composting; and b) treated stormwater and leachate, from composting operations; onto and into land in circumstances where contaminants may enter water in Haehanga Stream catchment and directly into an unnamed tributary of the Haehanga Stream at Grid Reference (NZTM) 1731656E-5686190N, 1733127E-5684809N, 1732277E-568510N, 1732658E-5684545N and 1732056E-5684927N

Consent 5839-2 – to discharge emissions into the air, namely odour and dust, from composting operations between (NZTM) 1731704E-5685796N, 1733127E-5684809N, 1732277E-5685101N, 1732451E-5684624N and 1732056E-5684927N

**STATEMENT OF EVIDENCE OF
DAVID PAUL GIBSON
DATED 9 March 2021**

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Introduction

1. My full name is David Paul Gibson. Remediation (NZ) LIMITED (RNZ) employs me as General Manager-Special Projects and Resource Consents. I have held that position since August 2019. Before that I was General Manager-Operations for RNZ (from October 2013). During that time and now, I oversee the Uruti Operation.

Qualifications and Experience

2. I have a Masters of Business Administration from Massey University (2000), a 3rd Marine Engineering qualification, a Certificate in Quality Management Systems (NZOQ 1995), and have been an assessor team leader for the National Business Excellence Foundation award program. I have spent the last 30 years of my career in senior operational management positions, focusing on the use of integrated management systems as an operational tool.

Purpose and Scope of evidence

3. Below is a summary of the purpose and scope of my evidence.
4. To identify that most effects are internalised to the site. The potential environmental externalities are:
 - (a) Offensive odour at the boundary;
 - (b) Effects on the Haehanga Stream;
5. To identify the organisational structure and the skill set of the team, and the total number of employees including part-time and full time;
6. Provide details of the site's operational aspects from a day-to-day perspective and the vital importance of good management. Also, to demonstrate that Remediation (NZ) Limited is well placed to implement the Management Plans prepared by Remediation (NZ) Limited;
7. To confirm the waste stream sources and to address the importance of the Uruti site to the RNZ's customers;
8. To identify changes in operation including cessation of drilling waste and the significance of that change to the issues of concern to the submitters;
9. Describe concerns re the odour issue and the limited number of verified complaints over the last ten years;
10. Describe the further operational changes and steps to manage odour including controlling cold air drainage from the site;

11. Describe improvements to the stream margins and native planting;
12. Address future improvements in the site, including:
 - (a) Further riparian planting;
 - (b) Revegetation of the land on the high erosion-prone slopes;
 - (c) To summarise the investment in the project and its importance to the region.

Description of operational aspects of the site

13. The Uruti Composting Site (UCS) is 38 km from New Plymouth situated at 1460 Mokau Road and in the Haehanga Stream catchment. The property's total area is 640ha, with the composting, vermiculture and irrigation paddocks taking up 30 ha of the property. The Haehanga Stream flows into the Mimitangiatua river. The Haehanga catchment is surrounded by 175m high hills. The operational areas are in the centre of the property 1.2km from Mokau Road (State Highway 3). The distance to the main road and topography provides a significant buffer area around the operational composting areas.
14. A site manager runs the site, with 1 permanent staff member and three part-time who are called in when necessary from Remediation's Brixton facility. Contractors are also used on-site from time to time. The house situated on the site is occupied, with this occupier providing security and communication on operational issues such as odour and site visitors. The General Manager-Consents has an overview of the site operation.
15. The main elements of waste processing with the new consents will focus on organic composting and vermiculture. Drilling wastes (oil-contaminated product) have ceased being received on site since 31 December 2020.
16. The main elements of waste processing on-site will be 'windrow composting' and vermicast production. The products produced are expected to be sold off-site.
17. I can confirm the material to be received on-site, as indicated in Table 2 of the AEE - 'Anticipated Waste Streams'.
18. The UCS provides a viable alternative for organic waste streams that would otherwise go to landfill at Bonny Glenn or Hampton Down landfill sites. Our UCS facility is available to local industries, i.e. poultry processing 24/7 (Taranaki is one of the country's larger poultry rearing regions). There are no other facilities available in Taranaki that provide the scale of organic waste disposal as we do at the UCS.

Importance of Management to Address Potential Externalities

19. Remediation (NZ) Ltd is well aware of the need to have sound management systems in place that address any potential environmental impacts.
20. A full suite of management plans has been developed for the site. These are based on ISO9000 (quality management), 4801(health and safety management), and 14001 (environmental management). Documents produced for the UCS have been categorised as an 'integrated management system'. These documents include an 'Odour Management' plan and an 'Environmental Management Plan'. Remediation (NZ) Ltd intends to have the management systems that have been put in place audited against the ISO9000 and 14001 standards. Good management is required for the site, and all permanent staff have a good understanding of the site 'Integrated Management System'.

Changes in Operation with the beneficial impacts

TRC Involvement

21. Many improvements on site have been implemented in consultation with the TRC. These include extending the irrigation areas, riparian planting and fish passage via on site culverts.
22. RNZ has consulted TRC regularly prior to any site improvement works.
23. There is regular discussion with TRC officers around operation of the site.

Cessation of Drilling Waste

24. The cessation of acceptance of hydrocarbon waste products was from 31st December 2020. Not receiving this product reduces risk significantly (i.e. oil-contaminated product and chlorides) and will reduce the amount of irrigation required. That will also have the effect of lowering odour significantly from the irrigation fluid, and the build-up of chlorides in the soil profile of the irrigation paddocks.
25. Remediation (NZ) understands the legacy issue from stockpiled drilling waste. It will continue to remediate this until the product is below the acceptance level of the MFE (Ministry for the Environment) guidelines for hydrocarbon contaminated soils.
26. Settlement ponds are cleaned out on an annual basis, and an aeration system is installed in the irrigation pond. It is recognised that ponds can go anaerobic because of lack of oxygen. This may be caused by a number of reasons such as organic matter being present at the bottom of the ponds, blue-green algae, or overturn.
27. Because of the Haehanga valley topography, cold air drainage under certain atmospheric conditions takes place. Cold air drainage takes place in the winter/spring months due to air temperature inversion. Odour complaints that have been verified

have occurred when cold air drainage is happening. Site operational staff are now aware of when this is likely to happen and have a contingency plan to reduce any likely odour at our boundary. Cold air drainage bunds have recently been built to guide any low lying air draining from the valley through an area with a deodourising mister. This has been commissioned and appears to work well when in operation.

Riparian Planting

28. Riparian planting is ongoing along the Haehanga stream banks. A plan has been developed with the help of the TRC, and each year further planting is undertaken. RNZ intends to continue this planting up the catchment beyond our operational areas. All site riparian planting is expected to be complete by the end of 2024.
29. Remediation (NZ) Ltd has applied to the 1BT fund for assistance in planting indigenous, mixed indigenous, and exotic (redwood, eucalyptus, tasmania blackwood and cyprus) on land that has been previously grazed (140ha). A site plan is attached that shows the areas to be planted out-see Appendix 1 'One Billion Tree Programme-Funding Agreement Map.

Odour externality

30. There are several residences within a kilometre of our roadside boundary. The composting pads are 1.6km from the sites Mokau Road boundary. There are five residences within 1km of the road boundary. The people at these residences are all known and communicated with as necessary. Item 1 of the graphics bundle shows the proximity of neighbours to the site boundaries.
31. Many complaints received over the years of operation have been from people from the same family. Where cold air drainage has been a problem, those living down the Mimitangiatua valley from our boundary are more susceptible to odour. Most complaints received have been from 1420 Mokau Road 1km SW from our entrance driveway. This residence is elevated with two other residents living closer to us and on the Mimitangiatua River bank not making any complaints to the TRC.
32. Credible complaints can be correlated to incidents of cold air drainage. That is now better understood and mitigation measures have been put in place to reduce the effects of cold air drainage transporting odour out of the Haehanga catchment.
33. Improvements made include cold air drainage bunding, the purchase and setup of a deodourising water cannon, and changes in operational compost and irrigation procedures.
34. Mr Curtis has been involved in assisting us manage odour from this site, and this is discussed more by Mr Curtis in his evidence.

Potential Effects Haehanga Stream

35. Several new irrigation areas have been developed over the past three years, adding a further 9ha. That has allowed irrigation to be spread over a greater area, reducing saline loading and the potential for overland runoff and nutrient losses. Mr Kay was commissioned to assist us with this aspect of site management, and this is discussed further by Mr Kay in the evidence he will present.
36. In 2015 BTW Company were commissioned to develop a site management plan with operational recommendations to improve soil, groundwater and surface water in the Haehanga catchment. The plan was developed with input from RNZ and Taranaki Regional Council and closely adheres to national and international guidelines. These guidelines have been used to set constituent levels for operations. Operational thresholds were developed that use a 'traffic light' system i.e. green is good-normal operation of the site, amber is increased level of monitoring where actions are taken to bring environmental factors back to green, and red is where immediate remediation action is required. All site monitoring indicates that operations are generally within the 'green zone'. In instances where parameters have been outside this zone, immediate actions have been undertaken to bring the parameter within regular operation.

Future Planting

37. The Haehanga catchment consists of river flats and then steep hillsides. Drystock farming has been predominant on these hillsides. For a period of time, the farm was run as a small dairy unit. A significant portion (200ha) of the farm has reverted to indigenous forest.
38. RNZ has applied to the 1BT fund to assist with planting out of all areas previous grazed into indigenous and exotic forest. That includes the river flat areas that are not used for irrigation purposes.
39. It is expected that the planting of trees and the removal of grazing stock will enhance the Haehanga stream biodiversity.

Investment

40. The site has been developed over the past 20 years as a composting and vermiculture operation. Before RNZ owning and operating the site it was owned and operated by Perry Environmental and used for similar activities.

41. Significant capital has been invested in the site since acquired by RNZ in 2008. Capital expenditure includes-
- (a) Expansion of irrigation areas
 - (b) Cold air drainage bunding
 - (c) Culvert replacement to allow fish pass
 - (d) Access tracks
 - (e) Fencing off waterways
 - (f) Riparian planting
 - (g) Purchase of deodoriser
 - (h) New weighbridge
42. The site was valued September 2019 at \$3.02m. That did not include plant and equipment used on site-valued at \$750k. Overall the investment in the site by RNZ is close to \$4m, on top of the work undertaken by Perry Environmental to develop the site and install the engineered wetland before RNZ purchasing it.

Conclusion

43. RNZ and I have every confidence that going forward we will be able to implement further measures to meet national and international standards for soil, groundwater and surface water monitoring. The removal of hydrocarbon related products reduces risk in these areas significantly. The odour issue is well understood and with correct operational techniques applied can be well controlled.

David Gibson
9 March 2021

Appendix 1-One Billion Tree Programme-Funding Agreement Map

