

New Plymouth District Council
Crematorium
Monitoring Programme
Annual Report
2019-2020

Technical Report 2020-50

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Executive summary

The New Plymouth District Council (NPDC) operates a crematorium located on Junction Road, New Plymouth. This report for the period July 2019 to June 2020 describes the monitoring programme implemented by the Taranaki Regional Council (the Council) to assess NPDC's environmental and consent compliance performance during the period under review. The report also details the results of the monitoring undertaken and assesses the environmental effects of NPDC's activities.

NPDC holds one resource consent, which includes a total of 22 conditions setting out the requirements that they must satisfy.

During the monitoring period, NPDC demonstrated an overall good level of environmental performance.

The Council's monitoring programme for the year under review included four compliance monitoring inspections, focusing on process control and possible visible emissions and odours.

There were a total of 414 cremations carried out at the NPDC crematorium during the 2019-2020 monitoring period.

A total of 767 cremations were performed in the Taranaki region between the NPDC and Abraham's crematorium during the 2019-2020 monitoring period.

NPDC is in the process of replacing the Newton cremator and completion of this work is anticipated to occur in the 2020-2021 monitoring period.

During the year, NPDC demonstrated a good level of environmental and a high level of administrative performance with the resource consent.

During the monitoring year, there was one incident involving the emission of black smoke self-reported by the consent holder. The matter was addressed and the new cremator proposed will further mitigate this type of event.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% of the consents, a good level of environmental performance and compliance was achieved.

In terms of overall environmental and compliance performance by the consent holder over the last several years, this report shows that the consent holder's performance improved in the year under review.

This report includes recommendations for the 2020-2021 year.

Table of contents

| | Page | |
|---------|--|----|
| 1 | Introduction | 1 |
| 1.1 | Compliance monitoring programme reports and the Resource Management Act 1991 | 1 |
| 1.1.1 | Introduction | 1 |
| 1.1.2 | Structure of this report | 1 |
| 1.1.3 | The Resource Management Act 1991 and monitoring | 1 |
| 1.1.4 | Evaluation of environmental and administrative performance | 2 |
| 1.2 | Process description | 3 |
| 1.2.1 | Newton cremator | 5 |
| 1.2.2 | Elecfurn cremator | 5 |
| 1.3 | Resource consents | 6 |
| 1.4 | Monitoring programme | 6 |
| 1.4.1 | Introduction | 6 |
| 1.4.2 | Programme liaison and management | 6 |
| 1.4.3 | Site inspections | 6 |
| 2 | Results | 7 |
| 2.1 | Inspections | 7 |
| 2.1.1 | Cremator maintenance | 7 |
| 2.1.1.1 | Newton cremator | 7 |
| 2.1.1.2 | Elecfurn cremator | 7 |
| 2.2 | Cemeteries and crematoria by-law | 7 |
| 2.3 | Investigations, interventions, and incidents | 8 |
| 3 | Discussion | 10 |
| 3.1 | Discussion of site performance | 10 |
| 3.2 | Environmental effects of exercise of consents | 10 |
| 3.2.1 | Neighbourhood | 10 |
| 3.2.2 | Physical effects | 10 |
| 3.2.2.1 | Visible emissions | 11 |
| 3.2.2.2 | Odour | 11 |
| 3.2.2.3 | Toxic by-products | 11 |
| 3.2.2.4 | Particulate deposition | 11 |
| 3.2.2.5 | Nitrogen and sulphur oxides | 11 |
| 3.3 | Evaluation of performance | 12 |
| 3.4 | Recommendations from the 2018-2019 Annual Report | 13 |

| | | |
|-----|--|----|
| 3.5 | Alterations to monitoring programmes for 2020-2021 | 13 |
| 4 | Recommendations | 15 |
| | Glossary of common terms and abbreviations | 16 |
| | Bibliography and references | 17 |
| | Appendix I Resource consents held by New Plymouth District Council | |

List of tables

| | | |
|---------|---|----|
| Table 1 | Summary of consents held by New Plymouth District Council-Crematorium | 6 |
| Table 2 | Incidents, investigations, and interventions summary table | 9 |
| Table 3 | Summary of performance for consent 5205-2 | 12 |
| Table 4 | Evaluation of environmental performance over time | 13 |

List of figures

| | | |
|----------|---|---|
| Figure 1 | Location of New Plymouth crematorium | 4 |
| Figure 2 | Annual number of cremations at New Plymouth crematorium, July 2001 to June 2020 | 4 |

1 Introduction

1.1 Compliance monitoring programme reports and the Resource Management Act 1991

1.1.1 Introduction

This report is for the period July 2019 to June 2020 by the Council and describes the results of the monitoring programme associated with an air discharge permit held by New Plymouth District Council (NPDC) to cover emissions to air from NPDC's crematorium on Junction Road (State Highway 3), 5 km south of New Plymouth.

Since 1 October 1991, with the enactment of the *Resource Management Act 1991* (RMA), the Council has been the agency with primary responsibility for air quality management in the Taranaki region. Early in 1992, the Council initiated air quality monitoring programmes for industries holding discharge permits, and has subsequently issued and monitored air discharge permits for a number of other industrial and trade premises.

The Council began monitoring the New Plymouth crematorium in 1998. This report is the 22nd annual report to be prepared by the Council to cover the crematorium air discharges and their effects.

1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the RMA and the Council's obligations;
- the Council's approach to monitoring sites through annual programmes;
- the resource consent held by NPDC in relation to the crematorium;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted at the crematorium site.

Section 2 presents the results of monitoring during the period under review, including scientific and technical data.

Section 3 discusses the results, their interpretation, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2019-2020 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- a. the neighbourhood or the wider community around an activity, and may include cultural and social-economic effects;
- b. physical effects on the locality, including landscape, amenity and visual effects;
- c. ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;
- d. natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and
- e. risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' inasmuch as is appropriate for each activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource management and, ultimately, through the refinement of methods and considered responsible resource utilisation, to move closer to achieving sustainable development of the region's resources.

1.1.4 Evaluation of environmental and administrative performance

Besides discussing the various details of the performance and extent of compliance by NPDC, this report also assigns them a rating for their environmental and administrative performance during the period under review.

Environmental performance is concerned with actual or likely effects on the receiving environment from the activities during the monitoring year. Administrative performance is concerned with NPDC's approach to demonstrating consent compliance in site operations and management including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder and unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

Environmental Performance

High: No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.

Good: Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self reports, or during investigations of incidents reported to the Council by a third party but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time;
- Strong odour beyond boundary but no residential properties or other recipient nearby.

Improvement required: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self reports, or during investigations of incidents reported to the Council by a third party. Cumulative

adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.

Poor: Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

Administrative performance

High: The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and co-operatively.

Good: Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.

Improvement required: Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.

Poor: Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% of the consents, a good level of environmental performance and compliance was achieved.¹

1.2 Process description

The New Plymouth crematorium has been operating at its site on Junction Road (Figure 1), 5 km south of the city, since 1961. It was the only crematorium in the Taranaki region until March 2009, when W Abraham Ltd crematorium commenced operation at Bell Block. Approximately 343 cremations are undertaken annually.

The Newton Mark IV propane gas-fired cremator was installed in 1997 to replace the original diesel-fired unit. The Elecfurn HH2500 gas-fired cremator was commissioned on 10 October 2005.

¹ The Council has used these compliance grading criteria for 15 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018



Figure 1 Location of New Plymouth crematorium

As shown on the graph in Figure 2, the establishment of the crematorium of W Abraham Ltd crematorium resulted in a substantial reduction in the number of cremations in 2009-2010 at the NPDC crematorium, and numbers have steadily increased to around 400 cremations during the years following with 414 cremations carried out in the 2019-2020 period. 307 cremations were via the Newton cremator and 107 cremations via the Elecfurn cremator.

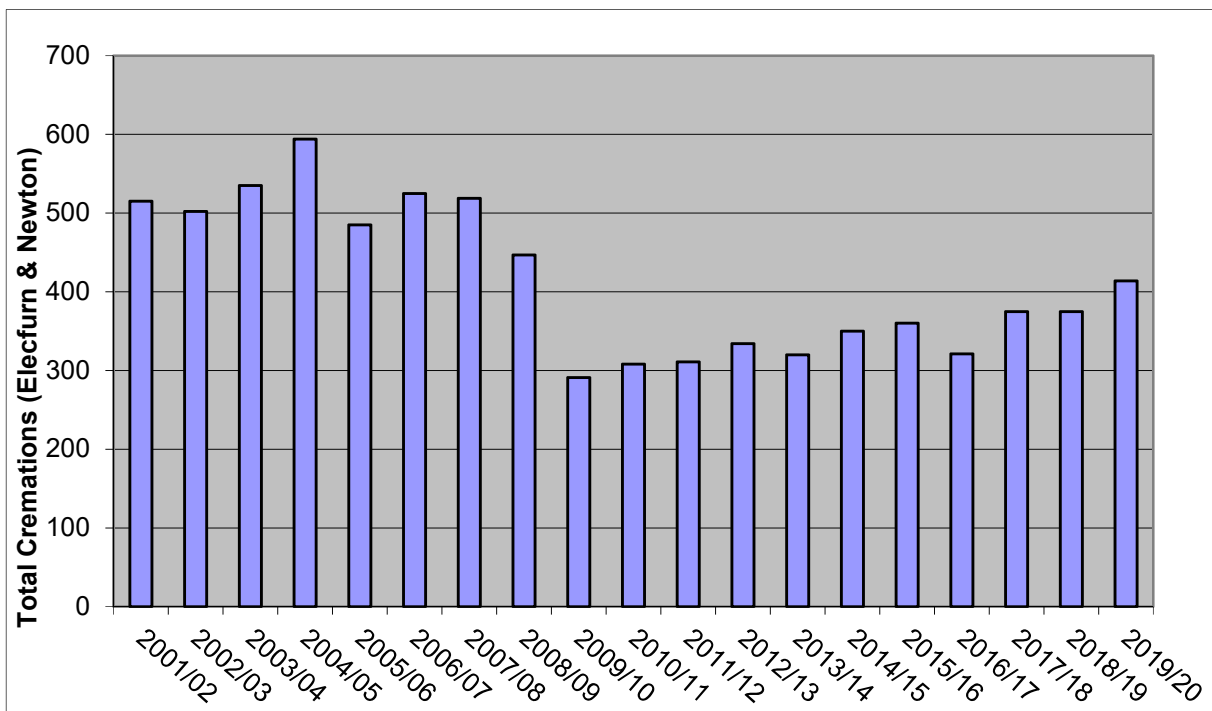


Figure 2 Annual number of cremations at New Plymouth crematorium, July 2001 to June 2020

1.2.1 Newton cremator

The Newton cremator is designed to comply with the criteria of the United Kingdom Environmental Protection Act (PG 5/2 95). It is a fully automatic unit that needs minimal operator involvement. It is pre-heated, charged and monitored until it is ready for removal of ash. Structurally, it consists of two combustion zones. A secondary chamber is wrapped around the primary combustion chamber. Some of the heat generated during the cremation process is transferred through the walls, arch and floor of the primary chamber to the secondary chamber by thermal conductivity. This increases fuel efficiency and increases the ability of the system to maintain consistent and high temperatures throughout both zones.

The primary and secondary chamber burners, and eight different air suppliers, are modulated by a microprocessor controller to achieve optimum conditions. Another (third) burner was installed in the second chamber in November 2007 to maintain more uniform temperature and allow more rapid heat-up.

The computer controller will not allow the cremator to be charged unless the temperature in the secondary chamber reaches 650°C and a two-second residence time is achieved. Data on residence time, emission levels, furnace pressure and rates of temperature change are used to continuously check and adjust controls to ensure maximum efficiency.

A feature of the Newton cremator is a water curtain charging system. This spray system retards the start of the cremation process until the charge door is closed, and allows higher operating temperatures to be maintained. Benefits include increased operator safety and a reduction of the smoking effect of heavily varnished coffins. Higher temperatures can also be controlled using the water curtain system.

The exhaust flue from the Newton cremator initially was connected to the old brick flue for the diesel cremator. A long connecting duct, which had two sharp bends, led to reduced combustion efficiency and occasional smoking. A new 8-metre high flue for the Newton, with a more efficient flow path, was installed in June 2004. The high discharge point of the flue ensures that all ground-level concentrations are well below the recommended guideline levels. Controlled dilution air is provided at two points in the exhaust ducting of the Newton cremator. Exhaust velocities are therefore high and flue temperatures are quite low.

The average cremation time for the Newton cremator is 70 minutes.

During the first few minutes after a highly polished coffin is introduced into the cremator, flammable coatings are ignited. This can lead to excessive cremation temperatures, which result in the products of combustion moving too quickly through the secondary combustion chamber to be consumed, causing transient visible and odorous emissions.

Odours emanating from a crematorium site may occur if inefficient combustion (especially at low temperature) or burner lockout occurs during the later stages of the cremation. Close monitoring of the cremation process is needed to avoid releases, as any odour emitted is likely to be found offensive.

Emissions of heavy metals from the cremation process are not likely to be significant due to the low numbers of cremations occurring at the site per year. The only probable source is mercury from dental amalgams.

1.2.2 Elecfurn cremator

The Elecfurn HH-2500 is a hot hearth medium volume machine that, like the Newton machine, operates a gas-fired two-chamber controlled pyrolysis combustion process. A difference from the Newton is that the initial heat-up time is faster, being about 40 minutes rather than two hours, but the cycle time is longer, having a cremation time of about 90 minutes and requiring a 25-minute cool down prior to the next cremation (45 minutes longer than the Newton). This makes the Elecfurn the more efficient when only one cremation is performed in a day, but less efficient when consecutive cremations are performed because of longer cycle time and its higher gas usage rate.

The Elecfurn is equipped with two fully modulating nozzle mixing gas burners, one each in the primary and secondary chambers, both controlled by a PLC.

Three other modulating valves control hearth air, secondary addition air and flue eductor air. Like the Newton, an opacity (smoke) sensor is fitted for control and monitoring of visible emissions. The position of the opacity sensor is different to that of the Newton, being at the outlet of the secondary chamber rather than after the dilution air eductor.

A separate stack is installed for the Elecfurn machine, 10.3 metres in height, with a dedicated sampling port.

1.3 Resource consents

NPDC holds one resource consent the details of which are summarised in the table below. Summaries of the conditions attached to each permit are set out in Section 3 of this report.

Table 1 Summary of consent held by New Plymouth District Council-Crematorium

| Consent number | Purpose | Granted | Review | Expires |
|-----------------------------|---|-------------|-----------|-------------|
| <i>Air discharge permit</i> | | | | |
| 5205-2 | To discharge emissions into the air from the operation of a crematorium | 12 May 2015 | June 2026 | 1 June 2032 |

1.4 Monitoring programme

1.4.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the crematorium consisted of two primary components.

1.4.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- discussion over monitoring requirements;
- preparation for any consent reviews, renewals or new consent applications;
- advice on the Council's environmental management strategies and content of regional plans; and
- consultation on associated matters.

1.4.3 Site inspections

The crematorium was visited on four separate occasions during the 2019-2020 period. The inspections focused on plant processes and associated actual and potential emission sources and characteristics, including potential odour, dust, noxious or offensive emissions. Sources of data being collected by NPDC were identified and accessed, so that performance in respect of operation, internal monitoring, and supervision could be reviewed by the Council. The neighbourhood was surveyed for environmental effects.

2 Results

2.1 Inspections

The crematorium was inspected four times over the 2019-2020 monitoring period with cremations being undertaken at the time of inspection on all occasions. The performance of the cremators was discussed with the operators. Particular attention was given to detection and causes of any visual or odorous emissions.

The four programmed compliance monitoring inspections were carried out on the 14 August 2019, 22 October 2019, 31 January 2020, and 19 May 2020.

During all four inspections no objectionable or offensive odours were detected at or beyond the boundary. Compliance was achieved with all consent conditions inspected.

2.1.1 Cremator maintenance

NPDC have provided information on the maintenance of the cremators during the monitoring period as set out in section 2.1.1.1 and 2.1.1.2 below.

2.1.1.1 Newton cremator

Maintenance service reported by NPDC:

- Austeng contractors carried out a full service on the cremator – no faults were found.
- The cremator chambers were cleaned out.
- Contractors installed a new gas regulator and gave a test run.

2.1.1.2 Elecfurn cremator

- Contractors installed a new gas regulator and gave a test run.
- The cremator chambers were cleaned out.
- Contractors fixed fault with the out-temperature thermocouple.

2.2 Cemeteries and crematoria by-law

The NPDC bylaw contains a part (Part 37) on cemeteries and crematoria. The bylaw was revised during the 2007-2008 reporting period. An updated NPDC bylaw 2008, made under the *Local Government Act 2002*, came into force on 1 July 2008.

Resource consent 5205 is attached as an appendix. Items that have particular relevance to the exercise of a resource consent to emit to air from crematoria are detailed below:

- 13 *General conditions of cremation*
- 13.1(e) *Any person may be cremated in a crematorium if the council has received a declaration from the funeral director or the person presenting the body that to the best of his or her knowledge the casket contains no substances prohibited under the part.*
- 13.5 *The authorised officer may require the removal of any casket furnishings prior to cremation and these shall be disposed of in such a manner as the council or an authorised officer decides.*
- 14 *Style, design and material of any casket in which a person is to be cremated*
- 14.1 *A casket for cremation:*
- b) *shall be constructed from materials that will when combusted not exceed the crematorium's Taranaki Regional Council Air discharge permit (attached to this part as Appendix 2) or any subsequent amendment of the discharge permit or include any of the materials listed in Appendix 1 of this part;*
- f) *shall not contain any bottle, can or other thing or object which may explode or release carcinogens into the atmosphere, cause the crematorium to exceed its air discharge permit from the Taranaki Regional Council, or cause harm or damage to persons or property during cremation.*
- 14.3 *Materials that are unsuitable for combustion in the course of a cremation may be used on the exterior of a casket if they can be removed easily prior to cremation.*
- 15 *The council may make rules relating to cemeteries and cremation*
- 15.1 *The council may from time to time, by resolution, make rules relating to one or more cemeteries and crematoria on the following matters:*
- j) *items prohibited from cremation.*

Appendix I to the bylaw (which is for information only) contains a list of items prohibited from cremation. The list includes, among other things, die cast metals/aluminium/copper (large items only), mattresses, and PVC in all forms.

2.3 Investigations, interventions, and incidents

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with the consent holder. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual causes of non-compliance or failure to maintain good practices. A pro-active approach, that in the first instance avoids issues occurring, is favoured.

For all significant compliance issues, as well as complaints from the public, the Council maintains a database record. The record includes events where the individual/organisation concerned has itself notified the Council. Details of any investigation and corrective action taken are recorded for non-compliant events.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified individual/organisation is indeed the source of the incident (or that the allegation cannot be proven).

Table 2 below sets out details of any incidents recorded, additional investigations, or interventions required by the Council in relation to NPDC's activities during the 2019-2020 period. This table presents details of all events that required further investigation or intervention regardless of whether these were found to be compliant or not.

A self- notification event was received concerning smoke coming from the New Plymouth Crematorium on Junction Road, New Plymouth.

An investigation found that black smoke was being emitted during the cremation cycle of a heavy casket. The Elecurn cremator obscuration meter showed levels climbing to 13% and descended back up and down to 2% for the next 15 minutes.

An explanation was received from NPDC. The type of timber casket and contents had increased the burning state very fast causing the smoke emissions. This explanation was accepted by Council.

Table 2 Incidents, investigations, and interventions summary table

| Date | Details | Compliant (Y/N) | Enforcement Action Taken? | Outcome |
|------------|---|-----------------|---------------------------|---|
| 17/02/2020 | Black smoke was being emitted from the Elecurn cremator | N | Self-notification | The NPDC explanation was accepted by Council. |

3 Discussion

3.1 Discussion of site performance

Inspections by the Council over the 2019-2020 period found on-site management to be high and operation of the crematorium facility was good.

During the 2019-2020 monitoring period a self-notification was received concerning smoke emitting from the Elecfurn cremator. The explanation received was accepted by Council on this occasion.

There were a total of 414 cremations carried out at the NPDC crematorium during the 2019-2020 monitoring period. Overall, cremations have steadily been increasing with a 10% increase from the previous 2018-2019 monitoring period.

NPDC have provided information on the maintenance of the cremators during the monitoring period.

In response to the abatement notice served regarding the performance of the Newton cremator, TRC received a letter from the NPDC on 8 November 2018 which stated the following:

- The cremator in question is to be replaced in the next (2019-2020) financial year.
- Austeng company, the cremator suppliers are scheduled to undertake maintenance on the machine between the current time and Christmas, dependant on a replacement timeframe.
- A reminder will be sent to Funeral Directors regarding non-compliance with casket materials.
- The number of cremations for any one day for the Newton cremator will be limited to two.

All the above actions have been addressed by NPDC apart from replacing the Newton cremator. The new Joule cremator is near completion of manufacture and due to Covid19 restrictions, is waiting for the Australian borders to open to allow technicians to install the cremator in Taranaki.

A total of 767 cremations were performed in the Taranaki region between the NPDC and Abraham's crematorium during the 2019-2020 monitoring period.

3.2 Environmental effects of exercise of consents

The Taranaki Crematorium operated by the NPDC is located on Junction Road, New Plymouth. The present site of the crematorium is regarded as a suitable site to fulfil the needs of the community and NPDC.

The crematorium site is surrounded primarily by NPDC land, the majority of which is in forestry. The site is isolated from the major residential areas and continues to be in respect to rural zone management. State Highway 3 passes by the crematorium. This is the only road in the immediate vicinity. There are a few dwellings in the vicinity of the site on the neighbouring water treatment plant site (NPDC-owned) near the crematorium boundary.

3.2.1 Neighbourhood

During the 2019-2020 reporting period, no complaints were received via the public regarding smoke emissions from the crematorium.

3.2.2 Physical effects

The installation of gas-fired cremators has significantly enhanced the environmental performance of the facility. There are five potential issues surrounding the discharges to air from the Taranaki Crematorium.

3.2.2.1 Visible emissions

Inefficient combustion has the potential to produce visible emissions from the exhaust stack. Under the worst circumstances there is potential for black/dark smoke to be discharged.

The automated system allows control of the combustion process, and conditions can be altered instantaneously. The stoichiometric fuel/air ratio, greater heat, longer combustion zone and introduction of dilution air in the exhaust stream all contribute to the positive environmental performance of the cremator.

Previously NPDC had experienced a number of technical problems with this facility and had worked closely with the manufacturer to meet its environmental goals. Infrequently the crematorium has experienced difficulties meeting its 'free from visible smoke' condition in its consent.

3.2.2.2 Odour

Odoours emanating from a crematorium site are likely to be found offensive and possibly emotionally disturbing. Again, inefficient combustion (especially at low temperature) can lead to odour discharges. Improved combustion processes associated with the new, tightly controlled, cremator has led to minimal odour being produced.

3.2.2.3 Toxic by-products

The production of toxic by-products, such as heavy metals and dioxins, is a concern with many combustion processes. The AEE provided by NPDC clarifies this issue, stating that:

Dioxins are removed due to the complete combustion process and particularly the secondary chamber system that ensures full and controllable combustion. The cremation process is not considered a significant source for heavy metal by-products.

3.2.2.4 Particulate deposition

The reported low opacity of the smoke discharge from the two gas-fired cremators indicates low levels of particulates. The controlling computer monitors particulate levels and displays these on the screen at all times. The cremators are controlled so that they operate below the consent limit of 80 ppm. At this level it is not expected that there will be any adverse effects, such as the visible deposition of particulate either off or on the crematorium site.

3.2.2.5 Nitrogen and sulphur oxides

Nitrogen and sulphur oxides are often by-products of the combustion process.

Monitoring conducted by the Council in February and March 1999 has shown that the crematorium does not have any significant impact on nitrogen oxides levels in the vicinity.

The adverse effects from the NPDC's crematorium have potential to be marked given the sensitive nature of crematorium activities and social attitudes. The requirement for an efficient combustion system is emphasised with regard to minimising these effects. Maintenance of an efficient combustion process is therefore a paramount consideration of crematorium management.

3.3 Evaluation of performance

A tabular summary of NPDC's compliance record for the year under review is set out in Table 3.

Table 3 Summary of performance for consent 5205-2

| Purpose: To discharge emissions to air during operation of a crematorium | | |
|---|---|-----------------------------|
| Condition requirement | Means of monitoring during period under review | Compliance achieved? |
| 1. Adopt best practicable option to minimise adverse effects | Inspection and liaison with consent holder | No |
| 2. Exercise in accordance with application | Inspection and liaison with consent holder | Yes |
| 3. Approval prior to alterations to plant or processes | Inspection and liaison with consent holder | Yes |
| 4. Notification to Council prior to maintenance | Inspection and liaison with consent holder | Yes |
| 5. Cremator operated and maintained to prevent smoke, fumes during charging | Inspection and liaison with consent holder Self-notification - smoke emitted from the Elecurn cremator although Consent conditions were not breached | Yes |
| 6. Duct work leak proofed | Inspection | Yes |
| 7. Stack and duct insulation | Inspection | Yes |
| 8. Steps to reduce and minimise combustion of certain materials | Liaison with consent holder | Yes |
| 9. Limit on minimum temperature and time in secondary chamber | Continuous monitoring by consent holder | Yes |
| 10. Minimum stack height | Inspection | Yes |
| 11. Limit on minimum temperature in secondary chamber at charging | Continuous monitoring by consent holder | Yes |
| 12. Limit on opacity Elecurn cremator | Monitoring by consent holder and inspection by Council | Yes |
| 13. Limit on opacity Newton cremator | Monitoring by consent holder and inspection by Council | yes |
| 14. Continuously record outlet temperature of gases | Continuous monitoring by consent holder | Yes |
| 15. Maintain a maintenance / calibration schedule | Liaison with consent holder | Yes |
| 16. Limits on emission components | Monitoring by Council and NPDC (if required) | Yes |
| 17. Limits on emission components | Monitoring by Council and NPDC (if required) | Yes |
| 18. No offensive odour beyond boundary | Inspection | Yes |
| 19. No offensive odour beyond boundary | Inspection | Yes |

| Purpose: To discharge emissions to air during operation of a crematorium | | |
|---|--|----------------------|
| Condition requirement | Means of monitoring during period under review | Compliance achieved? |
| 20. Commissioning source emission tests | As requested by Council (if required) | N/A |
| 21. Provision of monitoring results | Liaison with consent holder | Yes |
| 22. Optional review provision | next review 2026 | N/A |
| Overall assessment of consent compliance and environmental performance in respect of this consent | | Good |
| Overall assessment of administrative performance in respect of this consent | | High |

N/A = not applicable

During the year, the Company demonstrated a good level of environmental performance and a high level of administrative performance with the resource consents as defined in Section 1.1.4.

Table 4 Evaluation of environmental performance over time

| Year | Consent no | High | Good | Improvement req | Poor |
|--------|------------|----------|----------|-----------------|----------|
| 2011 | 5205-1 | - | 1 | - | - |
| 2012 | " | - | 1 | - | - |
| 2013 | " | 1 | - | - | - |
| 2014 | " | 1 | - | - | - |
| 2015 | " | - | 1 | - | - |
| 2016 | " | - | 1 | - | - |
| 2017 | 5205-2 | - | 1 | - | - |
| 2018 | " | 1 | - | - | - |
| 2019 | " | - | - | 1 | - |
| 2020 | | | 1 | | |
| Totals | | 3 | 6 | 1 | 0 |

3.4 Recommendations from the 2018-2019 Annual Report

In the 2018-2019 Annual Report, it was recommended:

1. THAT in the first instance, monitoring of air emissions from the New Plymouth crematorium in the 2019-2020 year continue at the same level as in 2018-2019.
2. THAT should there be issues with environmental or administrative performance in 2019-2020, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

3.5 Alterations to monitoring programmes for 2020-2021

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

- the extent of information already made available through monitoring or other means to date;

- its relevance under the RMA;
- the Council's obligations to monitor consented activities and their effects under the RMA;
- the record of administrative and environmental performances of the consent holder; and
- reporting to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki exercising resource consents.

It is proposed that for 2020-2021 the monitoring programme remain at the same level as the 2019-2020 monitoring programme.

Prior to the new cremator being installed, a variation to consent 5202-2 will be required.

Additional monitoring may be necessary during the commissioning phase for the new Joule cremator.

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site in question. The Council reserves the right to subsequently adjust the programme from that initially prepared, should the need arise if potential or actual non-compliance is determined at any time during 2020-2021.

4 Recommendations

1. THAT in the first instance, monitoring of air emissions from the New Plymouth crematorium in the 2020-2021 year continue at the same level as in 2019-2020.
2. THAT should there be issues with environmental or administrative performance in 2020-2021, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.
3. THAT prior to the new cremator being installed, a variation to consent 5202-2 will be required.
4. THAT when the new cremator is installed consent 5202-2 special conditions 3, 16 & 20 will be exercised.

Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

| | |
|-------------------|---|
| Incident | An event that is alleged or is found to have occurred that may have actual or potential environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does not automatically mean such an outcome had actually occurred. |
| Investigation | Action taken by Council to establish what were the circumstances/events surrounding an incident including any allegations of an incident. |
| Incident Register | The Incident Register contains a list of events recorded by the Council on the basis that they may have the potential or actual environmental consequences that may represent a breach of a consent or provision in a Regional Plan. |
| Resource consent | Refer Section 87 of the RMA. Resource consents include land use consents (refer Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and 15), water permits (Section 14) and discharge permits (Section 15). |
| RMA | <i>Resource Management Act 1991</i> and including all subsequent amendments. |

For further information on analytical methods, contact a Science Services Manager.

Bibliography and references

- K2 Environmental Ltd (2006): Taranaki Crematorium, New Plymouth. 'Emission Assessment of Elecfurn Cremator.' February 2006.
- New Plymouth District Council Bylaw (2008): 'Part 3: Cemeteries and Crematoria.'
<http://www.newplymouthnz.com/Council/Council-Documents/Bylaws>
<https://www.newplymouthnz.com/-/media/NPDC/Documents/Council/Council%20Documents/Bylaws/Cemeteries%20and%20Crematoria%20Bylaw%202020%20adopted%20by%20the%20Council%2021%20April%202020.ashx>
- Stockholm Convention on Persistent Organic Pollutants 2001:
http://chm.pops.int/Portals/0/Repository/batbep_guideline08/UNEP-POPS-BATBEP-GUIDE-08-12.English.PDF
- Taranaki Regional Council (2019): 'New Plymouth District Council Crematorium Monitoring Programme Report 2018-2019.' Technical Report 2019-38.
- Taranaki Regional Council (2018): 'New Plymouth District Council Crematorium Monitoring Programme Report 2017-2018.' Technical Report 2018-49.
- Taranaki Regional Council (2017): 'New Plymouth District Council Crematorium Monitoring Programme Report 2016-2017.' Technical Report 2017-68.
- Taranaki Regional Council (2016): 'New Plymouth District Council Crematorium Monitoring Programme Report 2015-2016.' Technical Report 2016-14.
- Taranaki Regional Council (2015): 'New Plymouth District Council Crematorium Monitoring Programme Report 2013-2015.' Technical Report 2015-82.
- Taranaki Regional Council (2013): 'New Plymouth District Council Crematorium Monitoring Programme Report 2010-2013.' Technical Report 2013-37.
- Taranaki Regional Council (2010): 'New Plymouth District Council Crematorium Monitoring Programme Report 2009-2010.' Technical Report 2010-102.
- Taranaki Regional Council (2009): 'New Plymouth District Council Crematorium Monitoring Programme Report 2008-2009.' Technical Report 2009-107.
- Taranaki Regional Council (2008): 'New Plymouth District Council Crematorium Monitoring Programme Report 2007-2008.' Technical Report 2008-65.
- Taranaki Regional Council (2007): 'New Plymouth District Council Crematorium Monitoring Programme Report 2004-2007.' Technical Report 2007-117.
- Taranaki Regional Council (2004): 'New Plymouth District Council Crematorium Monitoring Programme Report 2003-2004.' Technical Report 2004-93.
- Taranaki Regional Council (2003): 'New Plymouth District Council Crematorium Monitoring Programme Report 2000-2003.' Technical Report 2003-31.
- Taranaki Regional Council (2000): 'New Plymouth District Council Crematorium Monitoring Programme Annual Report 1999-2000.' Technical Report 2000-49.
- Taranaki Regional Council (1999): 'New Plymouth District Council Crematorium Monitoring Programme Annual Report 1998-1999.' Technical Report 99-03.
- Taranaki Regional Council (1997): 'Regional Air Quality Plan for Taranaki.'

United Kingdom Department of Environment (1991): 'Environmental Protection Act 1990, Part 1 – Secretary of State's Guidance – Crematoria.' PG5/2(91) February 1991.

Appendix I

Resource consents held by New Plymouth District Council

(For a copy of the signed resource consent
please contact the TRC Consents department)

Water abstraction permits

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14. Permits authorising the abstraction of water are issued by the Council under Section 87(d) of the RMA.

Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations. Permits authorising discharges to water are issued by the Council under Section 87(e) of the RMA.

Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising discharges to air are issued by the Council under Section 87(e) of the RMA.

Discharges of wastes to land

Sections 15(1)(b) and (d) of the RMA stipulate that no person may discharge any contaminant onto land if it may then enter water, or from any industrial or trade premises onto land under any circumstances, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising the discharge of wastes to land are issued by the Council under Section 87(e) of the RMA.

Land use permits

Section 13(1)(a) of the RMA stipulates that no person may in relation to the bed of any lake or river use, erect, reconstruct, place, alter, extend, remove, or demolish any structure or part of any structure in, on, under, or over the bed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Land use permits are issued by the Council under Section 87(a) of the RMA.

Coastal permits

Section 12(1)(b) of the RMA stipulates that no person may erect, reconstruct, place, alter, extend, remove, or demolish any structure that is fixed in, on, under, or over any foreshore or seabed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Coastal permits are issued by the Council under Section 87(c) of the RMA.

Discharge Permit
Pursuant to the Resource Management Act 1991
a resource consent is hereby granted by the
Taranaki Regional Council

Name of
Consent Holder: New Plymouth District Council
Private Bag 2025
New Plymouth 4342

Decision Date: 12 May 2015

Commencement Date: 12 May 2015

Conditions of Consent

Consent Granted: To discharge emissions into the air from the operation of a
crematorium

Expiry Date: 1 June 2032

Review Date(s): June 2020, June 2026

Site Location: 629 Junction Road, New Plymouth

Legal Description: 1696418E-5669150N

Grid Reference (NZTM) Pt Lot 1 DP 8125 Blk X Paritutu SD
(Discharge source & site)

*For General, Standard and Special conditions
pertaining to this consent please see reverse side of this document*

Consent 5205-2.0

General condition

- a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

Special conditions

1. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or likely adverse effects on the environment arising from discharges to air from the site.
2. The consent holder shall undertake the activity in general accordance with the application for this consent (5205-2.0) and the application for the expired consent (5205-1.0). If there is a conflict between the applications the later application shall prevail, and if there is a conflict between the applications and consent conditions the conditions shall prevail.
3. Prior to undertaking any alterations to the plant, process, or operations, which may significantly change the nature or quantity or concentration of contaminants emitted from the site, the consent holder shall consult with the Chief Executive, Taranaki Regional Council, and shall obtain any necessary approvals under the Resource Management Act 1991 and any amendments.
4. The consent holder shall notify the Chief Executive, Taranaki Regional Council, at least 2 working days before any maintenance that may affect or include the calibration, monitoring, or process control of the cremators. Notification shall include the consent number and a brief description of the work to be done, and be emailed to worknotification@trc.govt.nz.
5. The consent holder shall at all times operate, maintain, supervise, monitor and control all processes so that emissions authorised by this consent are maintained at a practicable minimum.
6. The cremators and all duct work shall be maintained leak proof and gas tight to prevent the discharge of gases from the duct work or cremator, other than through the stack.
7. The stack flue and duct work leading to the stack shall be adequately insulated to avoid, as far as practicable, the condensation of liquids or the formation of soot smuts.
8. The consent holder shall take all reasonable steps to reduce and minimise the quantity of materials (such as PVC, metals, and other materials listed in the guidelines published by the Australasian Cemeteries and Crematoria Association (May 2004): *Contents of coffins delivered for cremation*) combusted within the cremator.

Consent 5205-2.0

9. The cremators shall be interlocked so as to prevent the introduction of a coffin to the primary chamber unless the temperature in the secondary combustion zone exceeds 650°C for the Elecfurn cremator and 720°C for the Newton cremator.
10. The minimum stack height for the discharge of exhaust emissions from the cremators shall be eight metres above ground level.
11. The incineration of the waste gases in the secondary chamber for both cremators shall be undertaken such that waste gases are held at a minimum temperature of 850°C for a minimum period of 2 seconds.
12. In any one cremation cycle of the Elecfurn cremator, not more than two one-minute averages of the opacity readings shall exceed 20% obscuration or Ringelmann Scale 1.
13. In any one cremation cycle of the Newton cremator, not more than two one-minute averages of the opacity readings shall exceed 2% obscuration or Ringelmann Scale 1.
14. The consent holder shall continuously record the temperature of gases within or at the outlet of the secondary chamber.
15. The consent holder shall maintain the schedule of maintenance and calibration of each unit including but not limited to its controlling, recording, and monitoring equipment and systems.
16. The consent holder shall control all emissions of carbon monoxide, nitrogen dioxide, fine particles (PM₁₀) and sulphur dioxide to the atmosphere from the site, in order that the maximum ground level concentration of any of these contaminants arising from the exercise of this consent measured under ambient conditions does not exceed the relevant ambient air quality standard as set out in the Resource Management (National Environmental Standards for Air Quality Regulations, 2004) at or beyond the boundary of the property.
17. The consent holder shall control all emissions to the atmosphere from the site of contaminants other than those expressly provided for under special condition 16, in order that they do not individually or in combination with other contaminants cause a hazardous, noxious, dangerous, offensive or objectionable effect at or beyond the boundary of the property.
18. The discharges authorised by this consent shall not give rise to an odour at or beyond the boundary of the site that is offensive or objectionable.

Consent 5205-2.0

19. For the purposes of special conditions 17 and 18, without restriction, an odour shall be deemed to be offensive or objectionable if:
 - a. it is held to be so in the opinion of an enforcement officer of the Taranaki Regional Council, having regard to the duration, frequency, intensity and nature of the odour; and/or
 - b. an officer of the Taranaki Regional Council observes that an odour is noticeable, and either it lasts longer than ten (10) minutes continuously, or it occurs frequently during a single period of more than one (1) hour; and/or
 - c. no less than three individuals from at least two different properties, each declare in writing that an objectionable or offensive odour was detected beyond the boundary of the site, provided the Taranaki Regional Council is satisfied that the declarations are not vexatious and that the objectionable or offensive odour was emitted from the site at the frequency and duration specified in (b). Each declaration shall be signed and dated and include:
 - i. the individuals' names and addresses;
 - ii. the date and time the objectionable or offensive odour was detected;
 - iii. details of the duration, frequency, intensity and nature of the odour that cause it to be considered offensive or objectionable;
 - iv. the location of the individual when it was detected; and
 - v. the prevailing weather conditions during the event.
20. At the written request of the Chief Executive, Taranaki Regional Council, the consent holder shall undertake emission test on discharges from the cremator. This emission testing shall:
 - a. be undertaken for all pollutants that are requested to be tested in writing by the Chief Executive, Taranaki Regional Council, for the volumetric flow of combustion gases, and for the oxygen concentration at the exit of the secondary chambers and at the test ports;
 - a. for each sample, be conducted over a complete cremation cycle, commencing as soon typical operating conditions have achieved, ending once calcining is complete, and over a period of at least one hour; and
 - b. comprise not less than three separate samples for each type of emission test undertaken, and shall have the concentration results corrected to 0 (zero) degrees Celsius, 1 (one) atmosphere pressure and on a dry gas basis.
21. The consent holder shall provide to the Chief Executive, Taranaki Regional Council, upon request, all monitoring (including results of all tests, relevant operating parameters, raw data, all calculations, assumptions and an interpretation of the results), and calibration and process control data whether generated and held by an operator, any automated process control systems or any agent of the consent holder.

Consent 5205-2.0

22. The Taranaki Regional Council may review any or all of the conditions of this consent by giving notice of review during the month of June 2020 and/or June 2026 for the purpose of:
- a) adding, amending or deleting any limit on discharge or ambient concentrations of any contaminant or contaminants; and/or
 - b) requiring the consent holder to adopt the best practicable option to remove or reduce any adverse effect on the environment caused by any discharge to the environment; and/or
 - c) requiring the consent holder to calibrate and/or maintain any monitoring and/or recording device to monitor combustion conditions or environmental performance of the cremator including but not limited to devices for the measurement and/or recording of oxygen and/or carbon monoxide within the secondary combustion chamber and/or exhaust stack; and/or
 - d) ensuring that the conditions are adequate to deal with any adverse effects of the discharge on the environment arising from the exercise of this consent which were not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 12 May 2015

For and on behalf of
Taranaki Regional Council

A D McLay
Director - Resource Management