

New Plymouth District Council
Crematorium
Monitoring Programme
Annual Report
2017-2018

Technical Report 2018-49

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Taranaki Regional Council
Private Bag 713
STRATFORD
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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 2017 to June 2018 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 Improvement required level of environmental performance.

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

The monitoring showed that, generally, compliance with consent conditions has been good. In the 2017-2018 monitoring period, there were six unauthorised incidents recording non-compliance in respect of NPDC's activities during the period under review. Two of these incidents were unforeseeable and unpreventable, and resulted in a power cut while a cremation was taking place. The remainder of the incidents were the result of visual smoke being observed.

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

For reference, in the 2017-2018 year, consent holders were found to achieve a high level of environmental performance and compliance for 76% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 20% 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 remains at a good level in the year under review.

This report includes recommendations for the 2018-2019 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
1.3.1	Air discharge permit	6
1.4	Monitoring programme	7
1.4.1	Introduction	7
1.4.2	Programme liaison and management	7
1.4.3	Site inspections	7
2	Results	8
2.1	Inspections	8
2.1.1	Cremator maintenance	8
2.1.1.1	Newton cremator	8
2.1.1.2	Elecfurn cremator	8
2.2	Cemeteries and crematoria by-law	8
2.3	Investigations, interventions, and incidents	9
3	Discussion	11
3.1	Discussion of site performance	11
3.2	Environmental effects of exercise of consents	11
3.2.1	Neighbourhood	11
3.2.2	Physical effects	11
3.2.2.1	Visible emissions	11
3.2.2.2	Odour	12
3.2.2.3	Toxic by-products	12
3.2.2.4	Particulate deposition	12
3.2.2.5	Nitrogen and sulphur oxides	12

3.3	Evaluation of performance	12
3.4	Recommendations from the 2016-2017 Annual Report	14
3.5	Alterations to monitoring programmes for 2018-2019	14
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 performance for consent 5205-2	12
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List of figures

Figure 1	Location of New Plymouth crematorium	4
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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 2017 to June 2018 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 21st 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 2018-2019 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 significant 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 in response to unauthorised incident reports, 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 in response to unauthorised incident reports. 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 in response to unauthorised incident reports. 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 2017-2018 year, consent holders were found to achieve a high level of environmental performance and compliance for 76% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 20% of the consents, a good level of environmental performance and compliance was achieved.

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 of W Abraham Ltd crematorium commenced operation at Bell Block. Approximately 320 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.



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 remained similar at just over 320 cremations during the years following with 375 cremations carried out in the 2017-2018 period. 205 cremations were via the Newton cremator and 170 cremations via the Elecfurn cremator.

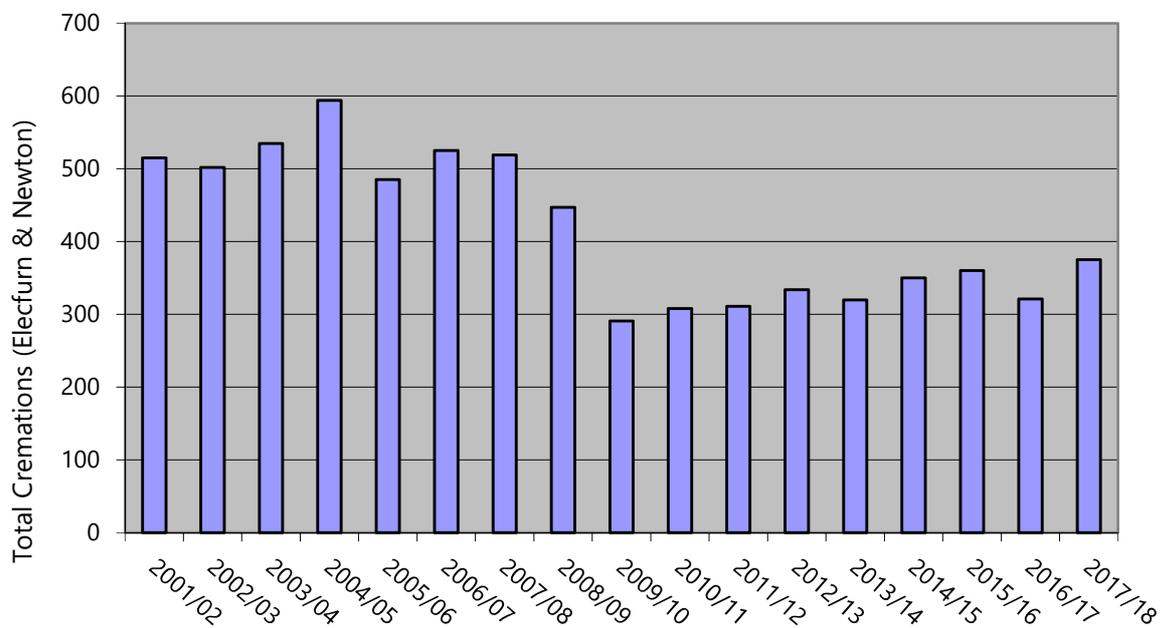


Figure 2 Annual number of cremations at New Plymouth crematorium, July 2000 to June 2018

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

1.3.1 Air discharge permit

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.

NPDC holds air discharge permit **5205** to discharge emissions into the air from the operation of a crematorium including a Newton cremator and the supplementary operation of an Elecfurn cremator. This permit was issued by the Council on 2015 under Section 87(e) of the RMA. It is due to expire on 1 June 2032.

Condition 1 requires adoption of the best practicable option to prevent or minimise any actual or likely adverse effects on the environment.

Condition 2 requires that the procedures and requirements set out in the consent application be followed, except when there is a conflict between such matters and the resource consent. In the case of conflict, the consent prevails.

Condition 3 requires that the consent holder consult with Council before carrying out any alterations which may change the nature, quantity or concentration of contaminants emitted from the site.

Condition 4 requires that Council be notified at least 24 hours before any maintenance relevant to exercise of the consent.

Condition 5 requires that the consent holder will operate, maintain, supervise, monitor and control all processes so that emissions authorised by this consent are maintained at a practicable minimum.

Conditions 6-7 relate to configuration of ducting and stacks.

Condition 8 addresses the reduction and minimisation of combustion of materials likely to generate unacceptable emissions, such as PVC.

Conditions 9 places temperature controls on the primary chamber to prevent the cremators doors from opening until temperature conditions have been met.

Condition 10 refers to the minimum stack height for the discharge of exhaust emissions from the cremators.

Condition 11 this condition addresses the requirements for the time and temperature within the secondary chamber for allowing complete combustion of the gases.

Conditions 12-13 addresses visible emissions, allowing no more than two one-minute periods per cremation of smoke of opacity more than 20% (Elecfurn cremator) and 2% (Newton cremator) on the Ringlemann Scale.

Condition 14 requires continuous monitoring and recording of exhaust gas temperature.

Condition 15 requires 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.

Condition 16-17 places limits on emission rate of specified air pollutants at a rate or quantity that is liable to be hazardous or toxic or noxious beyond the boundary.

Condition 18-19 specifies that no discharge from the premises shall give rise to a ground level odour which is offensive or obnoxious or objectionable.

Condition 20 require and defines commissioning source emission testing on discharges from the cremator.

Condition 21 requires the provision on request from Council of all monitoring, calibration and process control data regarding operation of the cremator.

Condition 22 is a review of the consent conditions.

The permit is attached to this report in Appendix I.

This summary of consent conditions may not reflect the full requirements of each condition. The consent conditions in full can be found in the resource consent which is appended to this report.

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;
- in 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 five separate occasions during the 2017-2018 period. The inspection 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 five times over the 2017-2018 monitoring period with cremations being undertaken at the time of inspection on four 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.

These monitoring inspections were carried out on the 29 August 2017, 23 November 2017, 25 January 2018, 7 February 2018 and 3 May 2018.

In general, both cremators were operating satisfactory although the Elecfurn cremator had mechanical and refractory issues which had resulted in dark smoke emanating from the flue stack for a brief period.

A power outage caused by Cyclone Gita tripped the Elecfurn cremator while a cremation was taking place, a contractor installing ultra-fast fibre on SH3 bored through a power cable, cutting power to the crematorium. The Newton cremator tripped while in operation. Follow up inspections were carried out after the two separate power outages had caused the cremator to trip while operating.

During all five Inspections no objectionable or offensive odours were detected at or beyond the boundary, although there were issues noted regarding smoke emissions from the flue stack within the premise.

2.1.1 Cremator maintenance

There were a total of 375 cremations carried out at the NPDC crematorium during the 2017-2018 monitoring period. Of these cremations, 205 were performed via the Newton Cremator and 170 cremations were via the Elecfurn cremator. 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

One maintenance issue was reported by NPDC:

- While operating, the obscuration reading was fluctuating throughout the cremation cycle. Contractors replaced the voltage regulator and the correct obscuration limits were achieved.

2.1.1.2 Elecfurn cremator

Three maintenance issues were reported by NPDC:

- The cremator would not finish off a programmed cycle. The oxygen sensor was found to be faulty. Contractors installed a new oxygen sensor, transmitter and a 12 volt power supply.
- A power surge had tripped both cremator fans. An electrical fault was found in the speed drive for both units. A second 12 volt power supply was installed and both cremators were working correctly.
- Contractors repaired dislodged bricks in the cremator ceiling due to an earthquake on 6 March 2018. Several hearth tiles were removed to inspect the supporting arch wall which was found to be ok.

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.

The Council operates and maintains a register of all complaints or reported and discovered excursions from acceptable limits and practices, including non-compliance with consents, which may damage the environment. The incident register includes events where the Company concerned has itself notified the Council. The register contains details of any investigation and corrective action taken.

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 company is indeed the source of the incident (or that the allegation cannot be proven).

In the 2017-2018 period, the Council was required to undertake several additional investigations, or record incidents, in association with NPDC's conditions in their resource consent.

21 December 2017 (TRC staff)

A TRC staff member reported seeing dark dense smoke emitting from the crematorium visible from the main road. NPDC reported that there had been minor issues with old equipment and that they were investigating a new cremator replacement in the long term.

7 and 15 February 2017 (NPDC advised)

NPDC advised the Council on two separate occasions that the Elecfurn cremator was smoking and that oxygen levels were fluctuating. NPDC staff shut the cremator down until further investigations were carried out. TRC staff visited the crematorium following the shutdown.

20 February 2018 (IN35765)

A power outage caused by cyclone Gita tripped the cremator while a cremation was taking place. Dark grey smoke emitted from the Elecfurn flue stack. A strong north westerly wind quickly dissipated the continuous smoke plume. The Council staff were notified. The NPDC crematorium does not have a backup generator.

10 April 2018 (IN34528)

A complaint was received from a member of the public regarding visible dark smoke being discharged from the New Plymouth crematorium. This issue was followed up by Council Staff.

3 May 2018

A Broad Spectrum contractor installing ultra-fast fibre on SH3 bored through a power cable cutting off power supply to the crematorium. The Newton cremator was operating at the time. Power was restored some time later enabling the process to be completed manually. NPDC staff reported minimal smoke emissions from the flue stack during this period.

28 June 2018 (IN36540)

While driving by a Council Officer noticed that black smoke was discharging from the New Plymouth Crematorium. This issue was followed up with NPDC.

3 Discussion

3.1 Discussion of site performance

Inspections by the Council over the 2017-2018 period found on-site management to be high and operation of the cremation facility to be good. Compliance with conditions of consent 5205 in respect of site operations and management were achieved in the most part.

During the 2017-2018 monitoring period the Newton cremator required minor electrical instrumentation repairs. The obscuration meter was continually fluctuating and the voltage regulator was replaced. The Elecurn cremator's oxygen sensor had failed and new parts were installed. NPDC have indicated that they may replace the Elecurn cremator in the near future. A power surge had stopped both cremator fans from operating. Minor refractory work was required to repair dislodged cremator ceiling bricks after an earthquake.

There were two separate power trips caused directly by Cyclone Gita and an interruption to the main power supply. Cremations taking place at the time were interrupted during both of these incidents. Council staff were able to manually operate the cremator once power was restored thereby limiting the smoke emissions and restoring temperature.

A total of 712 cremations were performed in the Taranaki region between the NPDC and Abraham's crematorium during the 2017-2018 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 2017-2018 reporting period, several complaints were received via the public regarding smoke emissions from the crematorium. These events were investigated by Council staff and followed up with where relevant.

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 discharge of smoke from the old cremator system was identified as an area of concern by at least one nearby resident.

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

Odours emanating from a crematorium site are also 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 1.

Table 1 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	Yes
2. Exercise in accordance with application	Inspection and liaison with consent holder	Yes

Purpose: To discharge emissions to air during operation of a crematorium		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
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	No – numerous black smoke incidents
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 Elecfurn cremator	Monitoring by consent holder and inspection by Council	Yes
13. Limit on opacity Newton cremator	Monitoring by consent holder and inspection by Council	No – visible smoke on numerous occasions
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
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 2020	N/A

Purpose: <i>To discharge emissions to air during operation of a crematorium</i>		
Condition requirement	Means of monitoring during period under review	Compliance achieved?
Overall assessment of consent compliance and environmental performance in respect of this consent		Improvement required
Overall assessment of administrative performance in respect of this consent		High

N/A = not applicable

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

3.4 Recommendations from the 2016-2017 Annual Report

In the 2016-2017 Annual Report, it was recommended:

1. That monitoring of air emissions from the New Plymouth crematorium in the 2017-2018 year continues at a similar level as during the 2016-2017 monitoring period

3.5 Alterations to monitoring programmes for 2018-2019

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 2018-2019, the monitoring programme remain at the same level as the 2017-2018 monitoring programme.

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 2018-2019.

4 Recommendations

1. THAT in the first instance, monitoring of air emissions from the New Plymouth crematorium in the 2018-2019 year continue at the same level as in 2017-2018.
2. THAT should there be issues with environmental or administrative performance in 2018-2019, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

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.

Bibliography and references

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- 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)

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

