

Your Ref:
Our Ref: APP202804 – EDN (Ethanedinitrile)



19 November 2018

Hazardous Substances
Environmental Protection Authority
Private Bag 63002, Waterloo Quay
Wellington 6140

Via email EDN@epa.govt.nz

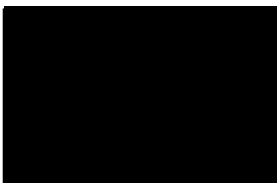
Dear Sir/Madam

APP202804 – EDN (Ethanedinitrile) – Bay of Plenty Regional Council's comments on the new information provided prior to the hearing and the results of the expert conferencing

1. The Bay of Plenty Regional Council notes that there are a number of questions raised and commented on by Dr Graham and Mr Hinkla, and a number of points were in disagreement. Further modelling has been highlighted by these experts and should be performed to determine ground level concentrations of EDN within the domain of interest. This further modelling should address the points highlighted by the experts, in order to provide the necessary confidence in the required outputs. Due to the nature of the activity and the micro meteorological effects that can occur at the Port of Tauranga, CFD modelling should also be investigated as part of this further exercise.
2. The Bay of Plenty Regional Council supports establishing a maximum concentration under the tarpaulin prior to venting. Dr Graham has proposed a value of 700 ppm. This should be a starting point for the further modelling exercise outlined in Point 1.
3. The Bay of Plenty Regional Council supports buffer distances of 20m (workers) and 120m (public) if proven to be appropriate by the modelling exercise outlined in Point 1.
4. The Bay of Plenty Regional Council recommends consideration and direction of what monitoring (required instrumentation and associated methodologies (e.g. monitoring locations) and reporting) would be used so that compliance with boundary limits can be verified and further modelling outputs can be validated.

Depending on the content of comments and following direction of the EPA, the Bay of Plenty Regional Council wishes to reserve its right to attend or call a further public hearing as per instructions in your email¹.

Yours sincerely



Eddie Grogan
Principal Regulatory Advisor

¹ Subject - Application open for written comments: APP202804 – EDN (Ethanedinitrile). Dated - Thursday, 8 November 2018 1:31 p.m.

Objective ID: A3049462