

Your Ref:
Our Ref: APP202804

8 March 2019



Hazardous Substances
Environmental Protection Agency
Private Bay 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 additional information provided (February 2019), and supporting documentation.

1. We were very supportive of the DMC’s intention “to view fumigation operations *in situ*” to “enable a fuller understanding and context regarding this application”.
(<https://www.epa.govt.nz/assets/FileAPI/hsno-ar/APP202804/APP202804-DMWGT001-Site-visit-21Aug18.pdf>)

It was therefore disappointing to read that when the DMC and EPA staff visited the Port for a tour that there was no opportunity to view a fumigation process occurring.
(<https://www.epa.govt.nz/assets/FileAPI/hsno-ar/APP202804/APP202804-DMWGT003-Site-visit-report-4Sept18.pdf>)

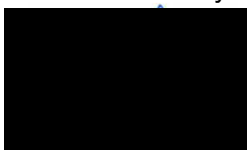
The Port of Tauranga operate a comprehensive network of video cameras and make footage available to the Bay of Plenty Regional Council on request. No doubt they would be prepared to do so for the EPA and DMC as well. Viewing such footage could prove as useful as viewing fumigation on site.

2. In the ‘[Responses To Questions From The DMC On EDN Air Concentrations Dispersion Modelling](#)’, it is stated that the time taken to remove a tarpaulin is typically 10-15 minutes.

Regional Council staff have observed (via video) times considerably less than this, with tarpaulin removal sometimes taking about 8 minutes per stack when multiple stacks are uncovered. Sometime two crews are employed side by side for the uncovering operation.

3. It was further stated in this document that “Consideration could be given to ventilation of more than 2 adjacent piles in an hour, although it was argued by the applicant that this was very unlikely to occur at the Port”. Again from video footage, we have observed 11 adjacent log stacks being ventilated consecutively, over the space of 90 minutes.

Yours sincerely



Sam Weiss
Senior Regulatory Project Officer