23 September 2021

Attention: **Tonkin + Taylor Limited**
C/O Jennifer Carvil
JCarvill@tonkintaylor.co.nz

Dear Jennifer,

Resource consent application – Further information request

Application number:	DIS60376538
Applicant:	New Zealand Steel Ltd
Address:	131 Mission Bush Road, Glenbrook
Proposed activity(s):	Discharges to air from the manufacture of steel

This letter is a request for further information that will help me better understand your proposal, including its effect on the environment and the ways any adverse effects might be mitigated.

Requested information

Rolling Mills and Coating Lines

1. AQR sections 3.4.2 & 3.4.3 describe Rolling Mill operations where fume generated is described as being extracted to fume hoods and mist eliminators. Please provide further details of these air discharges, including how any discharges of hazardous air pollutants are controlled.

2. AQR section 3.5 notes that 'in the context of the Steel Mill, there are no significant discharges to air' from the Finishing Plants. I agree with the relatively minor scale of these air discharges as compared to the very large Iron & Steel Plant discharges. However, I note that some of these processes require air discharge resource consents under AUP(OP) Table E14.4.1 in their own right, indicating that a more thorough assessment of effects is required than that presented in the AQR. Please provide further details of the air discharges arising from the Finishing Plants, including the estimated discharge rates of any hazardous air pollutants, measures to control these discharges and comment on any resulting effects of these discharges.

Fugitive air discharges (yards, raw materials, and slag processes)

3. Please define the maximum capacity and typical volumes of coal stored in outdoor stockpiles at the site.

4. AQR section 3.6.1 describes that the Primary Concentrate is heated with natural gas with air extraction to a baghouse. Please provide further details of this process (including the gross heating capacity and temperatures that the Primary Concentrate

attains) and comment on the potential effects of any resulting discharges of hazardous air pollutants.

5. Please detail the maximum crushing capacity for Slag and Metal Recovery operations and what water spray or other dust controls exist on the crusher units.

6. Several references are made in the AEE to a fume containment system for iron plating. Please provide further details of this system, including a diagram and photos, an assessment of its effectiveness for controlling air discharges of PM10.

7. As part of the assessment of alternatives and Best Practicable Option, please assess and comment on the potential application of the proposed iron plating fume containment system to be utilised for RPCC and slag tipping activities to mitigate air discharges from these activities.

8. The Ambient Air Quality Monitoring Report concludes that the majority of PM10 recorded at the 64 Glenbrook Road monitoring site arises from fugitive sources while PM2.5 is predominantly from stack sources. Please provide further commentary regarding the potential for fugitive dust sources to contribute to both PM2.5 and PM10 beyond the site boundary, including by reference to any available or published size-speciation of dust particles from any similar sources.

9. Please detail the frequency of RPCC tipping likely to occur, drawing on information from previous years.

10. AQR sections 8.5.4 & 8.6 note that RPCC tipping is likely responsible for the majority of off-site complaints received. Please analyse and comment on the spatial extent of any deposited dust identified through these complaints.

11. AQR section 8.3.3.4 states that the receipt of coal by truck has the propensity to generate more dust than when received by train. Please assess how any changes to this material handling activity over the past decade may have resulted in off-site dust effects and how the proposed methods of receipt and handling of coal compare to the Best Practicable Option to minimise air discharges from all sources (including materials handling and exhaust emissions).

12. AQR section 8.3.3.5 describes in general terms that heavy vehicle traffic around the Northern Operational Area has increased over the past decade, likely contributing to greater off-site PM10 concentrations. Please provide any available traffic volume data to support this assessment, along with an assessment of how internal roads and traffic flows may have changed over this period.

Dispersion modelling

13. Please provide an additional table showing how the modelled (average and maximum) stack discharges, presented in units of kg/hr in Tables 4.1 to 4.5 of the Modelling Report, correspond with the average and maximum in-stack concentrations as measured in past stack testing (as discussed in AQR sections 4.3 & 4.4) and consent limit emission concentrations, providing calculations to show the derivation of the average volumetric flowrates for each stack.

14. Table C.4 of Modelling Report Appendix C1.3.2 shows that the proposed consent limits for PM2.5 discharges have not been input as a modelling scenario. Please discuss how the assessment of effects supports the conclusions regarding off-site adverse effects given the proposed discharge limits, and/or if these discharge limits should be reduced (including 'split target' average/maximum approaches).

15. Section 2.6 of the Modelling Report describes a differing/adapted Proxy method for calculating the atmospheric conversion of NO to NO2 than that recommended by the Good Practice Guide for Assessing Discharges to Air from Industry (Ministry for the Environment, 2016). Please provide further commentary to support/defend the use of the semi-NO-limited proxy method in calculating this conversion, including by reference to available ambient air quality data.

Ambient air quality monitoring

16. Section 7 of the Ambient Monitoring Report shows that the average SO2 concentrations are heavily influenced by some outlying high readings. Please investigate and report the timings and corresponding site activities to assess the potential causes of these outlying readings.

Providing the information

Please provide this information in writing within 15 working days[1] (before 14 October 2021). If you will not be able to provide the information by that date, please contact me before then to arrange an alternative time. We will not work on your application any further until either you provide this information, or you state that you refuse to provide it.

Note: If you will require more than 15 working days to provide this further information, I will seek that you agree to an extension of time under section 37 of the Resource Management Act 1991 (the RMA). This will enable appropriate time for me to undertake the necessary review of the information once provided.

Refusing to provide the information

If you refuse to provide the information, or if you do not submit the information to us within 15 days (or by another other agreed time), the RMA requires that we publicly notify your application.[2]

If this happens, you will be required to pay the notification fee of $20,000 in full before we proceed with the notification of your application.[3]

Next steps

Once you have provided the requested information, I will review what you have provided to make sure it adequately addresses all of the points of this request.

In the application acceptance letter, I described the statutory timeframe for our decision on your application. The time for you to respond to this further information request will be

[1] Section 92A(1) of the RMA
[2] Section 95C of the RMA
[3] Section 36AAB(2) of the RMA

excluded from this timeframe[4]. I will be able to give you an updated forecast on a decision date on request once you have provided the information requested above.

If you have any queries, please contact me on 021 518 611 and quote the application number above.

Yours sincerely,

Jonathon Clarke
Intermediate Planner

[4] Section 88C(2) of the RMA