

**AUCKLAND REGIONAL COUNCIL**

**RESOURCE CONSENT**

**Granted pursuant to the Resource Management Act 1991**

**PERMIT NO. 14317**

**CONSENT HOLDER:** New Zealand Steel Limited

**FILE REFERENCE:** 8046

**STATUS OF ACTIVITY** Discretionary

**CONDITIONS OF CONSENT:**

**Duration of Consent:** This consent shall expire on 1 November 2021 unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the Resource Management Act 1991.

**Date of Lapsing of Consent** 1 August 2008

**Purpose of Consent:** To authorise the discharge of contaminants to air from the production of iron and steel and associated activities within the Glenbrook Iron and Steel Zone, in accordance with Section 15 (1)(c) of the Resource Management Act 1991.

**Site Location:** Mission Bush Rd, Glenbrook

**Legal Description of Land:** Lots 1, 2 and 3 Deposited Plan (DP) 202203; Lot 1 DP 20738; Lot 1 DP 27248; lot 1 DP 146074; Lots 1, 2 and 3 DP 29372; lot 1 and 2 DP 110268; lot 5 DP 102560; Allotments 363, 364, 285; allotment 122, part allotment 123 and middle part allotment 123 of the Parish of Waiuku East.

**Territorial Authority:** Franklin District Council

**Approximate Map Reference:** NZTM 1753097 mE 5880319 mN  
(NZMS 260 R12 637 423)

**DEFINITIONS:**

**PERMIT NO. 14317**

- Council:** Means the Auckland Regional Council
- Manager:** Means the Group Manager, Consent and Consents compliance, Auckland Regional council or nominated ARC staff acting on the managers behalf.
- Hazardous Air Pollutants:** Are defined in Schedule 7 – Hazardous Air Pollutants of the Proposed Auckland Regional Plan: Air, Land and Water (June 2005).
- Iron and Steel Zone:** Means the area zoned “Iron and Steel Industry” under the Franklin District Plan. (February 2000) that is contained within the boundaries of the site.
- Glenbrook steel mill:** Means the facility within the Iron and Steel Zone used for the production of iron and steel.
- Site:** Means all of the area shown on figure 1, owned by New Zealand Steel Limited in Glenbrook. This area includes the farm property, which provides a green belt and buffer.
- IANZ** International Accreditation New Zealand

**GENERAL CONDITIONS:**

1. That the servants or agents of the Council shall be permitted access to the relevant parts of the property at all reasonable times, for the purpose of carrying out inspections, surveys, investigations, tests, measurements or taking samples.
2. That the Consent Holder shall, operate the plant and associated processes generally in accordance with the documentation submitted to Council as part of application number 14317, where not amended by the conditions of this resource consent. No alterations shall be made to the plant or processes that do not, or are not likely to, comply with the provisions of this consent, a regional rule, or regulations under the Resource Management Act 1991, except as approved by the manager in accordance with Conditions 41, 46 and 47.
3. That the Consent Holder shall be responsible for discharges of contaminants to air from the Site and shall make any person undertaking activities on site, on its behalf, aware of any relevant conditions of this consent.
4. That the Consent Holder shall at all times operate, maintain, supervise, monitor and control all processes on site so that emissions authorised by this consent are maintained at the minimum practicable level.
5. That the Consent Holder shall adopt the best practicable option to remove or minimise any adverse effects on the environment beyond the boundary of the Site that arise from the exercise of this consent.

**LIMIT CONDITIONS:**

6. That without prejudice to the generality of Condition 4, the discharge of specified air pollutants from the specified sources shall not exceed the corresponding emission rates set out hereto:

SOURCE	Pollutant	Emission not to exceed (mg/m <sup>3</sup> )
Multiple hearth furnaces	Particulate matter	75
Kilns	Particulate matter	75
	Carbon monoxide	3,750
Vanadium Converter	Particulate matter	25
Melter metalside baghouse	Particulate matter	50
Melter slagside baghouse	Particulate matter	50
KOBM primary waste gas scrubber (Flare stack)	Particulate matter	200
	Particulate matter (annual average of all results)	160
Pipe mill zinc blow-out system	Particulate matter	125
Pipe mill zinc pot Baghouse	Particulate matter	10
Millscale & iron sand drier (steelserv)	Particulate matter	125
Acid Regeneration Plant	Hydrogen chloride	45
Pickle line fume scrubber	Hydrogen chloride	20

All emission concentrations shall be corrected to zero degrees Celsius, one atmosphere pressure and dry gas basis. All individual tests shall not exceed the above limit conditions.

7. That beyond the boundary of the Site there shall be no odour, dust, particulate, smoke, ash or fume caused by discharges from the Iron and Steel Zone which, in the opinion of an enforcement officer, is noxious, dangerous, offensive or objectionable.
8. That no discharges from any activity on site shall give rise to visible emissions, other than water vapour and clean steam, to an extent which, in the opinion of an enforcement officer, is noxious, dangerous, offensive or objectionable.
9. That beyond the boundary of the Site there shall be no discharge into air of any hazardous air pollutant, caused by discharges from the Iron and Steel Zone, which is present at a concentration that is, or is likely to be, detrimental to human health or the environment.

**PROCESS CONDITIONS:**

10. That dust generation by vehicle movements shall be maintained at the minimum practicable level. The measures adopted shall include procedures for watering unsealed roads, watering or cleaning of sealed roads, and restricting vehicle speeds on unsealed roads.

11. That fugitive emissions of particulate matter from pollution control equipment and from handling and transfer of dusty materials shall be maintained at the minimum practicable level. In particular, conveyors carrying dusty materials shall be fitted with drop chutes, and enclosures or covers as appropriate.
12. That emissions arising from the dumping of raw primary concentrate and char (RPCC), and from the plating of molten iron shall be kept to a practicable minimum.
13. That the flaring of melter gas shall be kept to a practicable minimum.
14. That Oxygen Steel Making Furnace (KOBM) primary waste gas flare outages and Melter flare outages shall be kept to a practicable minimum to ensure discharges of unburnt carbon monoxide are minimised.
15. That the Consent holder shall not dispose of material by open burning in the Iron and Steel Zone.
16. That the sulphur content of the coal used in the Multi Hearth Furnaces shall not exceed 0.5% by weight.

#### **Operation of Air Pollution Control Equipment**

17. That, with the exception of the Pan Conveyer scrubbers, no part of the process shall commence operation without the associated air pollution control equipment being fully operational and functioning correctly. Should a breakdown of control equipment occur during processing, the Consent Holder shall cease operation of all associated plant as soon as practicable and shall repair the control equipment as soon as practicable.
18. That the Pan Conveyer scrubbers shall be fully operational and functioning correctly as much as practicable when the pan conveyer systems are operating. Any scrubber down-time that occurs during process operation shall be for maintenance purposes only.
19. That all air pollution control equipment and associated ducting shall be maintained in good condition and as far as practicable be free from leaks in order to prevent the escape of fugitive emissions.
20. That all ducting to air pollution control equipment shall draw sufficient negative pressure to ensure that fugitive emissions are kept to a practicable minimum.
21. That the paint coating line afterburner(s) shall be operated so that all waste gases from solvent-based paint application and curing are held at a minimum temperature of 750°C, in excess oxygen for a minimum period of 0.5 seconds.

#### **MONITORING CONDITIONS:**

##### **Process Monitoring**

22. The Consent Holder shall monitor and record:

- (a) The flaring of Melter gas as a percentage of total Melter gas produced.
- (b) The mass of raw primary concentrate and char (RPCC) that is dumped and the amount of plating that occurs on a daily basis, and the reasons for each dumping or plating incident.
- (c) Pan Conveyor scrubber maintenance downtimes.
- (d) The times and dates that explosion flap lifts occur at kilns and Multi Hearth Furnaces, including the reason for the flap lift incident and any remedial action taken to minimise recurrence.
- (e) The temperature of the waste gases at the exit of the (or each) afterburner (incinerator) shall be continuously monitored and recorded.
- (f) Daily inspections of the KOBM baghouse for visible emissions and damaged bags.

**Stack emission testing**

23. That in addition to the regular process monitoring, emission tests shall be conducted on the sources specified below, in accordance with the specified frequency to determine compliance with Condition 6:

Source	Contaminant	Minimum Test Frequency
Multiple hearth furnaces	Particulate matter	6 monthly
	Oxides of nitrogen	1 yearly
Kilns	Particulate matter	6 monthly
	Carbon monoxide	6 monthly
	Oxides of nitrogen	1 yearly
Melter metal-side baghouses	Particulate matter	3 monthly
Melter slag-side baghouse	Particulate matter	3 monthly
Vanadium Converter	Particulate matter	3 monthly
	Oxides of nitrogen	1 yearly
KOBM primary waste gas scrubber (Flare stack)	Particulate matter	3 monthly
	Oxides of nitrogen	1 yearly
Pipe mill zinc blow-out system	Particulate matter	3 monthly
Pipe mill Baghouse	Particulate matter	annually
Slab re-heat Furnace	Oxides of nitrogen	1 yearly
Millscale & iron sand drier	Particulate matter	6 monthly
Acid Regeneration Plant	Hydrogen chloride	3 monthly
Pickle line fume scrubber	Hydrogen chloride	annually

24. All emission tests carried out in accordance with Condition 23 shall:

- (a) Be conducted during process conditions that are representative of normal process emissions.
  - (b) Comprise not less than three separate samples taken on the same day with the concentration results corrected to zero degrees Celsius, one atmosphere pressure and a dry gas basis.
  - (c) Be carried out by person/s who are IANZ accredited for the sampling methods.
25. The Consent Holder shall maintain permanent and safe access to all sampling points that are necessary to enable compliance with Condition 23.
26. The Consent Holder shall ensure that dye testing of the Iron making and Steelmaking baghouses is conducted when the associated plant is not operating and where vent emissions are visible or a stack limit is exceeded. As a minimum, testing will be done at least once every twelve months.

**Ambient Air Monitoring:**

27. The Consent Holder shall continuously measure and record wind speed and direction in the vicinity of the Glenbrook Steel Mill. The data shall be in a form that is immediately retrievable.
28. The Consent Holder shall measure total suspended particulate (TSP) at two sites in the vicinity of the Glenbrook Steel Mill. The monitoring shall be undertaken using equipment taking continuous measurements from 1 February 2007. The monitoring method and location of the sites shall be determined through consultation with the ARC and the Consent Holder.
29. The Consent Holder shall measure PM<sub>10</sub> at three locations in the vicinity of the Glenbrook Steel Mill. One of these locations will use the existing site at Glenbrook School. Each monitoring site shall continuously measure and record wind speed and direction. The monitoring shall be undertaken as follows:
- (a) The monitoring shall be undertaken using continuous measurements at one site from 1 February 2007.
  - (b) That the monitoring shall be undertaken using continuous measurements at all three sites from 1 June 2007.
  - (c) Any new monitors shall be run concurrently with the existing monitors for a minimum period of three months.
  - (d) The monitoring method and location of the sites shall be determined through consultation with the ARC and the Consent Holder.
30. That after 12 months of continuous monitoring the Consent Holder shall undertake an analysis of the results of the monitoring required under Conditions 28 and 29. A report shall be provided to the Manager by 1 September 2008 outlining the results of the analysis.

31. In the event that monitoring in accordance with Condition 28 shows that TSP levels exceed  $80\mu\text{g}/\text{m}^3$ , the Consent Holder shall conduct an investigation into the cause of the elevated levels. If the cause of the elevated levels of total suspended particulate is identified as being an activity undertaken within the Iron and Steel Zone, then as far as practicable, action shall be taken by the Consent Holder to reduce discharges from that activity. Any action taken shall be to the satisfaction of the Manager.
32. In the event that monitoring in accordance with Condition 29 shows that  $\text{PM}_{10}$  levels exceed  $33\mu\text{g}/\text{m}^3$  at Glenbrook School or  $50\mu\text{g}/\text{m}^3$  at any other site, the Consent Holder shall conduct an investigation into the cause of the level of  $\text{PM}_{10}$  at those sites. If the cause of the elevated levels is identified as being an activity undertaken within the Iron and Steel Zone, the Consent Holder shall prepare and submit to the Manager a remedial action plan within 3 months of the exceedence detailing methods to reduce  $\text{PM}_{10}$  levels to below relevant levels. The remedial action plan shall include a discussion on the contributions of the KOBM baghouse. The remedial action plan shall be to the satisfaction of the Manager.

### **General Monitoring**

33. All monitoring undertaken in accordance with Conditions 28 and 29 shall be undertaken by an IANZ accredited agency.
34. All monitoring and testing shall be carried out to the satisfaction of the Manager.

### **LOGGING AND REPORTING CONDITIONS**

35. That all documentation, records, monitoring and test results that are required by the conditions of this consent shall be made available on request, during operating hours, to an enforcement officer.
36. That all ambient monitoring and stack emission test results including raw data, all calculations, and assumptions that are required by the conditions of this consent shall be kept for at least the duration of this consent; and all other logs and records that are required by the conditions of this consent shall be kept for a minimum period of 24 months from the date of each entry.
37. That the Consent Holder shall notify an enforcement officer as soon as practicable in the event of any significant increase in the discharge of contaminants into air which may result in adverse effects on the environment.
38. That the Consent Holder shall log all air pollution complaints received. The complaint details shall include:
  - (a) The date, time, position and nature of the complaint.
  - (b) The name, phone number and address of the complainant, unless the complainant elects not to supply these details.
  - (c) The details of any investigation, the cause of the complaint and corrective actions undertaken in response to the complaint.

39. Details of any complaints received shall be provided to the Manager within 24 hours or as soon as practicable after the receipt of the complaint.
40. A summary of all information required by the conditions of this consent shall be provided to the Manager at least once every three months, unless otherwise stated. The summary shall include:
- (a) Results of the ambient monitoring and meteorological monitoring, including details of any exceedences of ambient monitoring trigger levels and any subsequent action to investigate and if necessary to remedy the exceedences.
  - (b) Provide an electronic copy of all raw data from ambient air and weather monitoring stations.
  - (c) That the Consent Holder shall report at least annually on the peak concentrations and the annual mass emissions of PM<sub>10</sub> and NO<sub>x</sub> (as NO<sub>2</sub>). The report for the previous calendar year shall be submitted to the Manager as part the next three monthly report required by this condition. Any major changes, both increases and decreases, in the potential mass emissions shall be included in the latest three monthly report.
  - (d) Results of stack emissions testing as specified in Condition 23.
  - (e) A summary of process monitoring as specified in Condition 22 including all process monitoring exceptions.
  - (f) A summary of any complaints received.
  - (g) A report on progress on implementation of either Condition 46 or Condition 47, as required by Condition 45.

The format of the report shall be agreed with the Manager and the first report shall be provided to the Manager within three months from the commencement of this consent.

41. The Consent Holder shall review all site major sources of air emissions and their associated pollution control equipment, including the KOBM baghouse. The information provided in the review should include but not be limited to:
- (a) The techniques applied to control emissions
  - (b) The current emission concentration after the control equipment
  - (c) The current emission concentration before the control equipment
  - (d) The current emission rate after the control equipment
  - (e) A rank of best to worst performing control equipment
  - (f) Relevant best practice



The review shall evaluate the results and compare them to current best practice. Where the results of the review are not the BPO, the report shall also address the steps to be taken to adopt the BPO and a timetable in which those steps shall be taken. The first review shall be submitted to the Manager for his approval by 30 September 2008 and every three years thereafter.

Note: the Manager may review (internally or externally) the assessment required by this condition. The cost of any such review will be borne by the Consent Holder.

42. That the Consent Holder shall, with the agreement of the Manager, determine the major point sources of PM<sub>10</sub> and NO<sub>x</sub> and major fugitive sources of PM<sub>10</sub> from the Site. The Consent Holder shall then provide the Manager, by 31 December 2006 with either:
- (a) A measurement of maximum daily and annual mass emissions of PM<sub>10</sub> and NO<sub>x</sub> from all major point and fugitive sources, or
  - (b) If measurements are not practicable, an estimate of maximum daily and annual mass emissions of PM<sub>10</sub> and NO<sub>x</sub> from all major point and fugitive sources based on robust emissions factors or proxy measurements.

Details of any measurements and the calculation methods used, including specifying all assumptions made and outlining the accuracy of any emission factors used, shall also be included with this information.

43. That the Consent Holder shall model the effects of PM<sub>10</sub> emitted from all major sources on the site. The modelling shall be done using the PM<sub>10</sub> emissions provided as part of consent Condition 42. The results shall be compared to known ambient PM<sub>10</sub> field measurements and shall be submitted by 30 March 2007. The type of modelling and the methodology shall be submitted to the Manager for approval.
44. That the Consent Holder shall review the PM<sub>10</sub> and NO<sub>x</sub> emissions for all the major point and fugitive sources in September 2008 and every 3 years thereafter. If the mass emissions of PM<sub>10</sub> from any one of these major sources is found to be more than 25% higher than a previous review, or if there appears to be a major source of PM<sub>10</sub> on site not accounted for in a previous review, then further modelling may be required at the discretion of the Manager.

*Note: The requirement for additional modelling will not be initiated without prior consultation with the Consent Holder.*

#### **PROPOSED PLANT MODIFICATIONS OR UPGRADE AND PEER REVIEW:**

45. Should the proposed modification to the vanadium extraction and slabmaking facilities (referred to in the documentation submitted by the Consent Holder to the Council in June 2006 as addendum to 1999 AEE) proceed, then Condition 46 shall apply. In the event that the proposed plant modifications are not to proceed then

Condition 47 shall apply. The Consent Holder shall report progress on implementation of either Condition 46 or 47 in the three -monthly compliance reports to the to the council, which are required by Condition 40.

46. Within 6 months of commissioning the Vanadium Converter the Consent Holder shall provide the Council with a report on reductions in Slabmaking Plant air emissions (including product dumping and KOBM Baghouse emissions). The Consent Authority may request that the report be independently reviewed by a suitably qualified person or person(s) (the Peer Reviewer) approved by the Manager.
47. In the event that the proposed plant modifications do not proceed then the Consent Holder shall investigate options for upgrading the air pollution control facility of the existing Vanadium Recovery Station in order to reduce mass emissions. The Consent Holder shall select one of those options for implementation and shall prepare a report to the Consent Authority on the investigation undertaken, the options available, the option selected and a timetable for implementation. The report shall be lodged with the Consent Authority not later than 31 December 2009.
48. The Consent Holder shall provide the Manager with all records, plans, designs and other information referred to in Conditions 41, 46 and 47 that the Peer Reviewer(s) require(s) to be able to undertake their peer review(s).

#### **ENVIRONMENTAL MANAGEMENT SYSTEM CONDITIONS:**

49. That the Consent Holder shall maintain an Environmental Management System (EMS) to an ISO 14000 or an equivalent standard. The EMS shall be updated to make it consistent with the conditions of this consent and shall be submitted to the Manager for review within 12 months of the consent being granted. The Manager will advise the Consent Holder in writing if any aspects of the Plan are considered to be inconsistent with achieving the provisions of this consent. The EMS shall accurately record all management and operational procedures, methodologies and contingency plans necessary to comply with the conditions of this consent including, but not limited to, the following:
  - (a) Methods to ensure that air pollution control systems are functioning correctly and consistently in accordance with Conditions 17, 18, 19, 20, and 21, (including but not limited to: preventative maintenance; critical process checks; responses to faults or alarm conditions; discharge monitoring; and preventative checks or inspections of interlocks, sensors, level controllers, switches etc).
  - (b) Actions that will be taken in response to any faults or alarm conditions that have the potential to effect discharges to air.
  - (c) Daily visual inspections of all stacks and vents discharging to air, including the KOBM bag house.

- (d) At least 12-monthly dye testing of the Iron and Steelmaking bag houses to detect any bag failures.
- (e) Monitoring of gas leaks around the Kilns Co-generation Plant by-pass damper to ensure that carbon monoxide emissions are kept to a practicable minimum.
- (f) Setting objectives and targets to minimise waste and process interruptions, as agreed with the Manager, and shall include the following:
  - i) Methods to ensure that fugitive dust emissions are maintained at a minimum practicable level as required by conditions 10, 11, 19 and 20.
  - ii) Targets and methods for limiting dumping of raw primary concentrate and char (RPCC) to a practicable minimum as per condition 12.
  - iii) Targets and methods for limiting plating.
  - iv) Targets and methods for lowering the number of pressure release flap lift incidents at the material-hearth furnaces.
  - vi) Targets and methods for minimising the flaring of melter gas as a percentage of total melter gas produced.
  - vii) Targets and methods for minimising the frequency of flare failures on the melters and on the KOBM primary waste gas ventilation.
  - viii) Targets and methods for minimising the frequency of Pan Conveyer scrubber maintenance downtimes.

**REVIEW CONDITION:**

50. That the conditions of this consent may be reviewed by the Manager pursuant to Section 128 of the Resource Management Act 1991, by the giving of notice pursuant to Section 129 of the Act, in August 2007 and during every second August thereafter in order:
- (a) Deal with any significant adverse effect on the environment arising from the exercise of the consent, which was not foreseen at the time the application, was not considered and which is appropriate to deal with at the time of the review.
  - (b) Consider the adequacy of conditions which prevent adverse effects beyond the boundary of the site, particularly if regular or frequent complaints have been received and validated by an enforcement officer.
  - (c) Consider developments in control technology and management practices that would enable practical reductions in the discharge of contaminants into air.
  - (d) To require the Consent Holder to adopt the best practicable option to remove or reduce any adverse effect on the environment arising from the exercise of this consent.

- (e) Alter the monitoring requirements, including further monitoring, or increasing or reducing the frequency of monitoring.
- (f) Consider the adequacy of conditions in the event that the ambient monitoring undertaken indicates that exceedences of the Resource Management (National Environmental Standards relating to Certain Air Pollutants, Dioxins, and Other Toxics) Regulations 2004 (NES) and any subsequent amendments have occurred or are likely.

The Consent Holder shall meet the reasonable costs of any such reviews in accordance with section 36 of the RMA.

**ADVICE NOTES:**

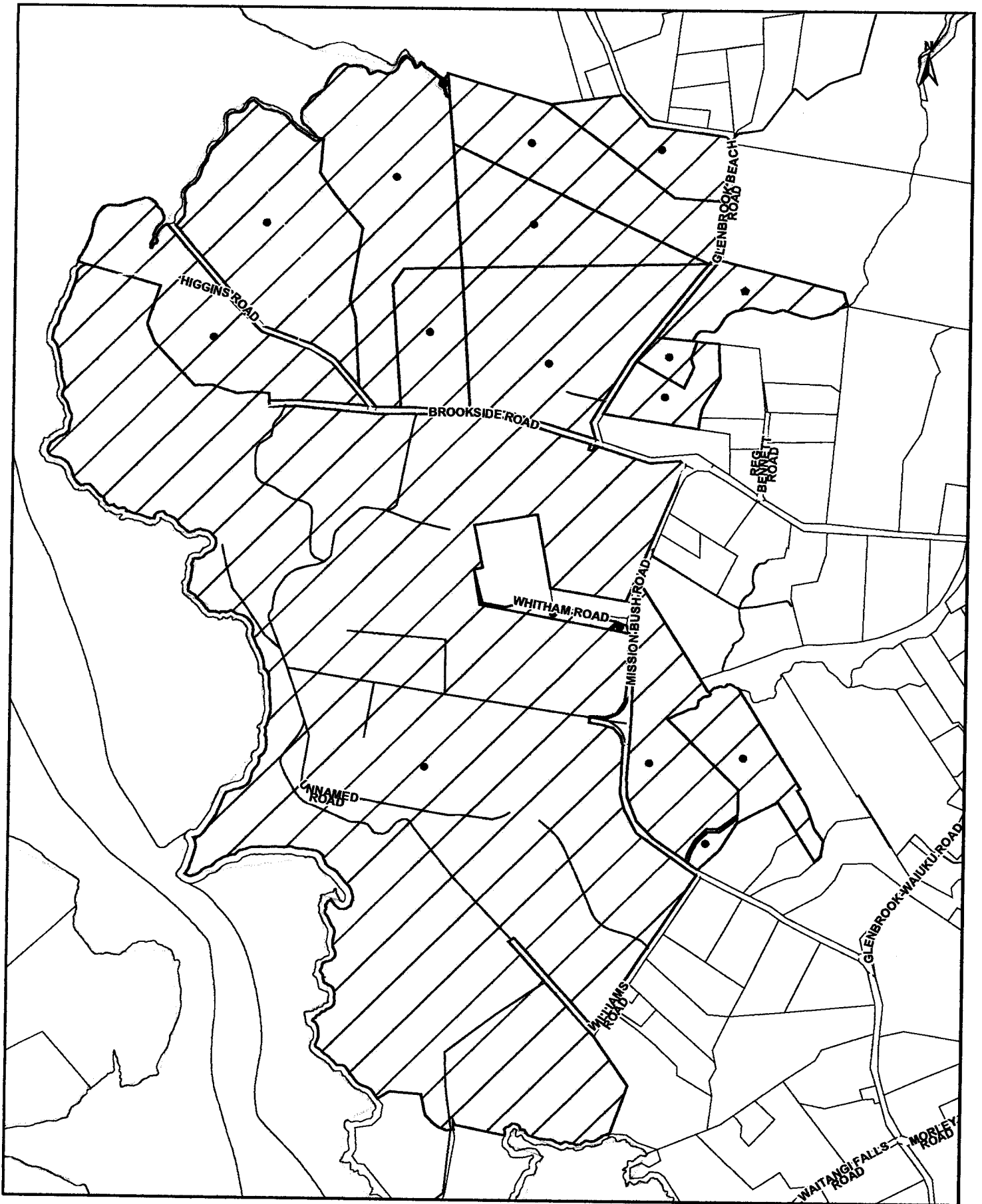
1. The Consent Holder is advised that it will be required to pay to the Council any administrative charge fixed in accordance with Section 36(1) of the Resource Management Act 1991, or any additional charge required pursuant to Section 36(3) of the Resource Management Act 1991 in respect of this consent.
2. The Consent Holder is advised that the date of the commencement of this consent will be as determined by Section 116 of the Resource Management Act 1991, unless a later date is stated as a condition of consent. The provisions of Section 116 of the Resource Management Act 1991 are summarised in the covering letter issued with this consent.
3. The Consent Holder is advised that, the Council may at any time undertake source emission testing and/or any other monitoring to investigate compliance with the conditions of this consent. The Consent Holder is advised that it will be required to pay for the costs of this monitoring as per Advice Note 1.
4. The Consent Holder is advised that, the Council may at any time seek independent expert advice in relation the exercise of the resource consent. The Consent Holder is advised that it will be required to pay for the costs of expert advice as per Advice Note 1.

**This consent has been granted by the Auckland Regional Council pursuant to the Resource Management Act 1991.**



**Pieter Tuinder**  
**Manager**  
**Consents and Consents Compliance**  
**Auckland Regional Council**

Date: 29/11/06



0 50 100 200 300 400 500 Meters

# New Zealand Steel Ltd

## Figure 1

Legend  
 NZ Steel Ltd Site

Map Produced by GIS  
 Information Services  
 Auckland Regional Council



Resource consent is required for the following reason:

## Air Discharge Permit (s15) – DIS60363772

### Auckland Unitary Plan (Operative in part)

#### **Air Discharge Permit (operative plan provisions)**

##### *Air Quality*

- To undertake iron plating, being the refining of any metal, is a **discretionary** activity under rule E14.4.1(A41).

*Note: The Site is not within an airshed that is considered to be polluted under the NES:AQ, and therefore Regulation 17 of the NES:AQ is not relevant to this application.*

#### **Decision**

I have read the application, supporting documents, and the report and recommendations on the application for resource consent. I am satisfied that I have adequate information to consider the matters required by the Resource Management Act 1991 (RMA) and make a decision under delegated authority on the application.

Acting under delegated authority, under sections 104, 104B, 105, and 107 and Part 2 of the RMA, the resource consent is **GRANTED**.

#### **Reasons**

The reasons for this decision are:

1. In accordance with an assessment under ss104(1)(a) and (ab) of the RMA, the actual and potential effects from the proposal will be acceptable as:
  - a. Council's Specialist for Air Discharge has stated that despite the increased frequency of plating during COVID-19 Level 4 restrictions, the PM<sub>10</sub> concentrations measured at Glenbrook Beach Rd (GBR), Glenbrook School, and Sandspit Rd monitoring sites during Alert Level 4 were generally lower than the long-term average. The total PM<sub>10</sub> and PM<sub>2.5</sub> particulates, when combined with existing discharges, are within the ambient levels identified within the AUP(OP) and human health levels. Adverse effects are therefore acceptable on human health.
  - b. Council's Specialist for Air discharge has assessed nuisance dust emissions, being particulates greater than 10 microns. The actual contribution from the plating process to hourly ambient Total Suspended Particulate (TSP) concentrations (Training Centre) was estimated to be up to 2 µg/m<sup>3</sup> for each ladle, and cumulatively below the threshold of 80 µg/m<sup>3</sup> as set out in the conditions of the existing consent. In terms of dust settlement, it is noted that the discharges rise quickly into the atmosphere due to the hot temperatures of the molten metal. Subsequently, when dispersed into the atmosphere, the particles are further diluted and spread further apart by wind. Should any dust eventually settle, it is unlikely to be noticeable.

- c. The applicant's Air Quality Report details briefly the effects of iron deposition, particularly ferric oxide, on offsite aquatic ecosystems. Council's Specialist for Air discharge has stated that given the negligible predicted increase in overall offsite TSP concentrations, as identified above, any ecosystem effects from the additional commercial iron plating activities are considered to be negligible.
- d. Conditions of consent have been offered by the applicant to continue to monitor air discharges to ensure human health and ambient air quality standards are not exceeded. This ensures continued management of effects of the commercial plating activity.
- e. In terms of visual effects, when molten iron is plated, a cloud that is orange/brown in colour is emitted into the atmosphere. This discharge is temporary (lasting less than 10 minutes for each ladle), and when viewed in conjunction with existing discharges on the site (including Steel Mill's chimneys, and existing consented iron plating), is considered to be acceptable in this instance.
- f. In terms of positive effects, New Zealand Steel contributes to the local, regional, and national economies in the following ways:
  - o Contributes over 4000 jobs (directly and indirectly) within Auckland;
  - o Contributes over \$600 million per annum to the New Zealand economy;
  - o For every tonne of steel produced in New Zealand, 80% of the dollars spent on that steel stay within New Zealand, compared to only 5% of the dollars spent on imported steel.

The continued operation of the steel mill therefore translates into providing for the South Auckland community's social, economic, and cultural wellbeing.

- g. With reference to s104(1)(ab), there are no specific offsetting or environmental compensation measures proposed or agreed to by the applicant to ensure positive effects on the environment.
2. In accordance with an assessment under s104(1)(b) of the RMA, the proposal is consistent with the relevant statutory documents. In particular:

Auckland Unitary Plan (Operative in Part)

*B7. Toitū te whenua, toitū te taiao – Natural resources*

*B7.5.1(1-3): Objectives – Air*

*B7.5.2(1-2): Policies - Air*

*E14. Air Quality*

*E14.2(1-4): Objectives*

*E14.3(1,5,8,9): Policies*

Overall, it is considered that the proposal is consistent with the above objectives and policies. The proposal, being a commercial iron plating activity, will emit particles into the air within the Business – Heavy Industry Zone, which is enabled by the plan and recognised as having low air quality. Particulates discharged by the iron plating activity will be below levels that would adversely affect human or ecosystem health. Additionally, there is a significant distance between the discharge point and the nearest sensitive receiver, thus ensuring that

incompatible activities are sufficiently separated, and adverse effects effectively mitigated or avoided. Given the limited timeframe of the proposal, being until 1 November 2021, it is considered that the best practicable option has been chosen to manage adverse effects.

3. In accordance with an assessment under s104(1)(c) of the RMA, no other matters are considered relevant.
4. In terms of section 105 of the RMA, it has been determined that there are no significant effects on the receiving environment. Alternative locations for the iron plating discharges are not relevant as steel mill activities have occurred on the site since 1968 and it is therefore considered that there are no other locations more suitable for the iron plating. It is further considered the applicant's reasons for the proposed discharges of contaminants into air are appropriate in the circumstances. In particular, a balancing of positive social and economic benefits arising from the proposal.
5. In terms of section 107 of the RMA, there are restrictions on the granting of certain discharge permits that would contravene sections 15 or 15A of the RMA. The proposed discharge is to air and not water or land. The discharges consist of iron oxide particles and will not result in the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials within water, any conspicuous change in the colour or visual clarity of water, any emission of objectionable odour, the rendering of fresh water unsuitable for consumption by farm animals, or any significant adverse effects on aquatic life. It is therefore considered that section 107 matters are not relevant to the type of discharge which will result from the proposal. Therefore, there is no restriction on granting this consent in accordance with s107.
6. In the context of this discretionary activity application air discharges, where the objectives and policies of the relevant statutory documents were prepared having regard to Part 2 of the RMA, they capture all relevant planning considerations and contain a coherent set of policies designed to achieve clear environmental outcomes. They also provide a clear framework for assessing all relevant potential effects and there is no need to go beyond these provisions and look to Part 2 in making this decision as an assessment against Part 2 would not add anything to the evaluative exercise.
7. Overall, the proposal is considered to be in keeping with the objectives and policies of the Auckland Unitary Plan (Operative in Part). The proposed commercial iron plating activity will be undertaken in conjunction with existing activities on the site, where cumulatively, adverse effects arising from total suspended particulates, PM<sub>10</sub>, and PM<sub>2.5</sub>, will be less than health and air quality limits as identified within the AUP(OP). Continued monitoring will ensure these limits are not exceeded. Adverse effects on the environment will be less than minor.

## Conditions

### Definitions

*Commercial Iron Plating*

*Means the plating of molten iron specifically for commercial purposes as more particularly described in the application for*



*this consent (for clarification, this does not include process plating of molten iron that is necessary as part of the Glenbrook steel mill's normal operations).*

*Council:*

*Means the Auckland Council*

*Manager:*

*Means the Group Manager, Consent and Consents compliance, Auckland Council or nominated AC staff acting on the managers behalf*

*Hazardous Air Pollutants:*

*Are defined in Schedule 7 – Hazardous Air Pollutants of the Proposed Auckland Regional Plan: Air, Land and Water (June 2005).*

*Iron and Steel Zone:*

*Means the area zoned “Iron and Steel Industry” under the Franklin District Plan. (February 2000) that is contained within the boundaries of the site.*

*Glenbrook steel mill:*

*Means the facility within the Iron and Steel Zone used for the production of iron and steel.*

*Site:*

*Means all of the area shown on figure 1, owned by New Zealand Steel Limited in Glenbrook. This area includes the farm property, which provides a green belt and buffer.*

*IANZ*

*International Accreditation New Zealand*

## **General Conditions**

Under sections 108 and 108AA of the RMA, this consent is subject to the following conditions:

*Advice note:*

*The conditions set out below reflect the structure and content of the conditions of Permit 14317. Where a condition is [blank], that particular condition of air discharge consent DIS80296529 [NRSI-14317] is not applicable to this Commercial Iron Plating resource consent. The numbering has been retained to provide consistency with air discharge consent DIS80296529 [NRSI-14317].*

1. That the servants or agents of the Council shall be permitted access to the relevant parts of the property at all reasonable times, for the purpose of carrying out inspections, surveys, investigations, tests, measurements or taking samples.
2. That the Consent Holder shall, undertake Commercial Iron Plating activity generally in accordance with the documentation submitted to Council as part of application number DIS60363772, where not amended by the conditions of this resource consent.
  - Application Form and Assessment of Environmental Effects prepared by Mikayla Woods (Tonkin and Taylor), dated September 2020.

Report title and reference	Author	Rev	Dated
Air Quality Assessment: Commercial Plating at the Glenbrook Steel Mill. Ref: 1010577.0000	Tonkin and Taylor	2	17 September 2020

Other additional information	Author	Rev	Dated
Proposed Commercial Iron Plating Resource Consent Conditions	Tonkin and Taylor	-	-

- 2A. Under section 125 of the RMA, this consent lapses twelve (12) months after the date it is granted unless:
  - a. The consent is given effect to; or
  - b. The council extends the period after which the consent lapses.
- 2B. Under section 123 of the RMA, this consent expires on 1 November 2021, unless it has been surrendered or been cancelled at an earlier date pursuant to the Resource Management Act.
- 2C. The consent holder shall pay the council an initial consent compliance monitoring charge of \$1020 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent.

*Advice note:*

*The initial monitoring deposit is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc., all being work to ensure compliance with the resource consent. In order to recover actual and reasonable costs, monitoring of conditions, in excess of those covered by the deposit, shall be charged at the relevant hourly rate applicable at the time. The consent holder will be advised of the further monitoring charge. Only after all conditions of the resource consent have been met, will the council issue a letter confirming compliance on request of the consent holder.*

3. That the Consent Holder shall be responsible for discharges of contaminants to air from the Site and shall make any person undertaking activities on site, on its behalf, aware of any relevant conditions of this consent.

4. That the Consent Holder shall at all times operate, maintain, supervise, monitor and control all processes on site so that emissions authorised by this consent are maintained at the minimum practicable level.
5. [blank]

**Limit Conditions**

6. [blank]
7. That beyond the boundary of the Site there shall be no odour, dust, particulate, smoke, ash or fume caused by discharges from the Commercial Iron Plating activity which, in the opinion of an enforcement officer, is noxious, dangerous, offensive or objectionable.
8. That no discharges from any Commercial Iron Plating activity on site shall give rise to visible emissions, other than water vapour and clean steam, to an extent which, in the opinion of an enforcement officer, is noxious, dangerous, offensive or objectionable.
9. That beyond the boundary of the Site there shall be no discharge into air of any hazardous air pollutant, caused by discharges from the Commercial Iron Plating activity, which is present at a concentration that is, or is likely to be, detrimental to human health or the environment.

**Process Conditions**

10. [blank]
11. [blank]
12. [blank]
- 12A. The consent holder shall ensure that the maximum daily volume of Commercial Iron Plating produced does not exceed 500 tonnes per day and to a maximum of 210 tonnes an hour.
13. [blank]
14. [blank]
15. [blank]
16. [blank]

**Operation of Air Pollution Control Equipment**

17. [blank]
18. [blank]
19. [blank]
20. [blank]
21. [blank]

**Monitoring Conditions**

*Process Monitoring*

22. The consent holder shall monitor and record:
  - a. [blank]
  - b. The amount of Commercial Iron Plating that occurs on a daily basis.
  - c. [blank]
  - d. [blank]
  - e. [blank]
  - f. [blank]

*Stack Emission Testing*

23. [blank]
24. [blank]
25. [blank]
26. [blank]

*Ambient Air Monitoring*

27. The Consent Holder shall continuously measure and record wind speed and direction in the vicinity of the Glenbrook Steel Mill. The data shall be in a form that is immediately retrievable.
28. The Consent Holder shall measure total suspended particulate (TSP) at two sites in the vicinity of the Glenbrook Steel Mill. The monitoring shall be undertaken using equipment taking continuous measurements. The monitoring method and location of the sites shall be consistent with the monitoring method and location of sites utilised for air discharge consent DIS80296529 [NRSI-14317].
29. The Consent Holder shall measure PM<sub>10</sub> at three locations in the vicinity of the Glenbrook Steel Mill. The monitoring method and location of the sites shall be consistent with the monitoring method and location of sites utilised for air discharge consent DIS80296529 [NRSI-14317]. Each monitoring site shall continuously measure and record wind speed and direction.
30. [blank]
31. In the event that monitoring in accordance with Condition 28 shows that TSP levels exceed 80 µg/m<sup>3</sup>, the Consent Holder shall conduct an investigation into the cause of the elevated levels. If the cause of the elevated levels of total suspended particulate is identified as being as a result of the Commercial Iron Plating activity, then as far as practicable, action shall be taken by the Consent Holder to reduce discharges from that activity. The incident and remedial action taken shall be reported to Council.
32. In the event that monitoring in accordance with Condition 29 shows that PM<sub>10</sub> levels exceed 33µg/m<sup>3</sup> at Glenbrook School or 50 µg/m<sup>3</sup> at any other site, the Consent Holder shall conduct an investigation into the cause of the level of PM<sub>10</sub> at those sites. If the cause of the elevated levels is identified as being as a result of the Commercial Iron Plating activity, the Consent Holder shall prepare and submit to the Manager a remedial

action plan within 3 months of the exceedance detailing methods to reduce PM10 levels to below relevant levels. The remedial action plan shall be to the satisfaction of the Council.

#### *General Monitoring*

33. All monitoring undertaken in accordance with Conditions 28 and 29 shall be undertaken by an IANZ accredited agency.
34. All monitoring and testing shall be carried out to the satisfaction of the Council.

#### **Logging and Reporting Conditions**

35. That all documentation, records, monitoring and test results that are required by the conditions of this consent shall be made available on request, during operating hours, to an enforcement officer.
36. That all ambient monitoring results including raw data, all calculations, and assumptions that are required by the conditions of this consent shall be kept for at least the duration of this consent; and all other logs and records that are required by the conditions of this consent shall be kept for a minimum period of 24 months from the date of each entry.
37. That the Consent Holder shall notify an enforcement officer as soon as practicable in the event of any significant increase in the discharge of contaminants into air from Commercial Iron Plating which may result in adverse effects on the environment.
38. That the Consent Holder shall log all air pollution complaints received. The complaint details shall include:
  - a. The date, time, position and nature of the complaint.
  - b. The name, phone number and address of the complainant, unless the complainant elects not to supply these details.
  - c. The details of any investigation, the cause of the complaint and corrective actions undertaken in response to the complaint.
39. Details of any complaints received shall be provided to the Manager within 24 hours or as soon as practicable after the receipt of the complaint.
40. A summary of all information required by the conditions of this consent, shall be provided to the Manager at least once every three months, unless otherwise stated. The summary shall include:
  - a. Results of the ambient monitoring and meteorological monitoring, including details of any exceedances of ambient monitoring trigger levels and any subsequent action to investigate and if necessary to remedy the exceedances.
  - b. Provide an electronic copy of all raw data from ambient air and weather monitoring stations.
  - c. [blank]
  - d. [blank]
  - e. [blank]

f. A summary of any complaints received.

g. [blank]

41. [blank]

42. [blank]

43. [blank]

44. [blank]

**Proposed Plant Modifications or Upgrade and Peer Review**

45. [blank]

46. [blank]

47. [blank]

48. [blank]

**Environmental Management System Conditions:**

49. That the Consent Holder shall maintain an Environmental Management System (EMS) to an ISO 14000 or an equivalent standard. The EMS shall be reviewed to ensure it is consistent with the conditions of this consent. The EMS shall accurately record all management and operational procedures, methodologies and contingency plans necessary to comply with the conditions of this consent.

a. [blank]

b. [blank]

c. [blank]

d. [blank]

e. [blank]

f. [blank]

(i) [blank]

(ii) [blank]

(iii) [blank]

(iv) [blank]

(v) [blank]

(vi) [blank]

(vii) [blank]

(viii) [blank]

## Review Condition

50. Under Section 128 of the RMA, the conditions of this consent may be reviewed by the Manager Resource Consents at the consent holder's cost in order to:
- a. Deal with any significant adverse effect on the environment arising from the exercise of the consent, which was not foreseen at the time the application was considered, and which is appropriate to deal with at the time of the review.
  - b. Consider the adequacy of conditions which prevent adverse effects beyond the boundary of the site, particularly if regular or frequent complaints have been received and validated by an enforcement officer.
  - c. Consider developments in control technology and management practices that would enable practical reductions in the discharge of contaminants into air.
  - d. [blank]
  - e. Alter the monitoring requirements, including further monitoring, or increasing or reducing the frequency of monitoring.
  - f. [blank]
  - g. Take into account any Act of Parliament, regulation, national policy statement, regional policy statement or relevant regional plan that relates to limiting, recording or mitigating emissions by this consent.

Or, the consent may be reviewed by the Manager Resource Consents at any time, if it is found that the information made available to the council in the application contained inaccuracies which materially influenced the decision and the effects of the exercise of the consent are such that it is necessary to apply more appropriate conditions.

## Advice notes

1. *The Consent Holder is advised that it will be required to pay to the Council any administrative charge fixed in accordance with Section 36(1) of the Resource Management Act 1991, or any additional charge required pursuant to Section 36(3) of the Resource Management Act 1991 in respect of this consent.*
2. *The Consent Holder is advised that the date of the commencement of this consent will be as determined by Section 116 of the Resource Management Act 1991, unless a later date is stated as a condition of consent. The provisions of Section 116 of the Resource Management Act 1991 are summarised in the covering letter issued with this consent.*
3. *The Consent Holder is advised that, the Council may at any time undertake source emission testing and/or any other monitoring to investigate compliance with the conditions of this consent. The Consent Holder is advised that it will be required to pay for the costs of this monitoring as per Advice Note 1.*
4. *The Consent Holder is advised that, the Council may at any time seek independent expert advice in relation the exercise of the resource consent. The Consent Holder is*

*advised that it will be required to pay for the costs of expert advice as per Advice Note 1.*

5. *Any reference to number of days within this decision refers to working days as defined in s2 of the RMA.*
6. *For the purpose of compliance with the conditions of consent, “the council” refers to the council’s monitoring inspector unless otherwise specified. Please email [monitoring@aucklandcouncil.govt.nz](mailto:monitoring@aucklandcouncil.govt.nz) to identify your allocated officer.*
7. *For more information on the resource consent process with Auckland Council see the council’s website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz). General information on resource consents, including making an application to vary or cancel consent conditions can be found on the Ministry for the Environment’s website: [www.mfe.govt.nz](http://www.mfe.govt.nz).*
8. *If you disagree with any of the above conditions, and/or disagree with the additional charges relating to the processing of the application(s), you have a right of objection pursuant to sections 357A and/or 357B of the Resource Management Act 1991. Any objection must be made in writing to the council within 15 working days of your receipt of this decision (for s357A) or receipt of the council invoice (for s357B).*
9. *The consent holder is responsible for obtaining all other necessary consents, permits, and licences, including those under the Building Act 2004, and the Heritage New Zealand Pouhere Taonga Act 2014. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007 and the Health and Safety at Work Act 2015), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004.*

Delegated decision maker:

Name: Tracey Grant

Title: Principal Project Lead, Resource Consents

Signed:



Date: 8/10/2020