

Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Tuesday, 28 July 2020 10:26 am
To: Emily McDowall
Subject: RE: Odour complaint at Interwaste - WGN110357
Attachments: scan@interwaste.co.nz_20200728_091741.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good morning Emily

We would normally have notified the neighbours of the sump clean out ahead of time but my supervisor had failed to do so. This is entirely our mistake.

It will be easy enough for me to create a notice with intent form that we both will need to sign.

It is part of our repair and maintenance to clean out the sumps. This normally happens once per annum unless there happens to be a blockage or we are preparing for a full site audit (which is what we are doing now).

The only way I can see to minimise the smell would be to use a deodoriser. With the thousands of litres of waste in these sumps I don't see this making a difference. The process is pretty straightforward with the sump truck using a big hose to suck the waste out and straight into a septic tank of sort on the back of their truck. This is the best form of containment.

The guys live next door as well as work and this has caused us some headaches in the past. For example they complain when we work out in the yard too early with the forklift and this sump truck does make a bit of noise when sucking up the waste however I believe we can come to an agreement with the guys of a time that suits.

In regards to our air freshener solution, one of our services includes the supply and servicing of the Oxygen Pro air freshener range (please see the attached pamphlet). This is an eco-friendly and reliable product that we have situated around major hospitals and other locations. We had installed one last year I believe but for some reason was taken out. The guys at Vape Canyon liked it.

Cheers

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



International Waste Ltd

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www.interwaste.co.nz



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Monday, 27 July 2020 5:09 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: RE: Odour complaint at Interwaste - WGN110357

Hello Blair,

This notification has only been passed onto me now which is a bit frustrating. Oh well.
Thanks for informing us of this complaint.

I think it sounds good to notify neighbours in advance of these operations and keep up regular communication with neighbours.

I wondered, is there any way to minimise the smell emanating from the sumps when they are cleaned? (E.g. can the material be better encapsulated throughout the process?) I imagine this would be very difficult/impossible but thought I'd check.

The next thing I wondered is, presuming there isn't a way to minimise the smell, could the sumps be cleaned at a time of day when the neighbours, including staff at Vape City, will not be at work (in the weekend or after hours)? My understanding is your location is an industrial area so we don't have to worry about people being home at their houses. (Also, how often are the sumps cleared?)

The reason I ask is because I'm aware that many air 'fresheners' and deodorisers on the market may contain toxic chemicals, so I wondered if there are other ways of approaching this rather than masking the smell with a (potentially harmful) spray.

This might be easier to chat about over the phone, so feel free to give me a call tomorrow.

Thanks,
Emily
04-830-4074

From: Notifications <Notifications@gw.govt.nz>
Sent: Monday, 27 July 2020 4:15 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Subject: FYI FW: Odour complaint, 12 Broken Hill Road, Porirua. Interwaste Limited consent ref # WGN110357

Saved to ourspace

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Thursday, 23 July 2020 4:02 PM
To: Notifications <Notifications@gw.govt.nz>
Subject: Odour complaint, 12 Broken Hill Road, Porirua. Interwaste Limited consent ref # WGN110357

Good afternoon

Today we had Dawson's here cleaning out our sumps. This created a potent odour that has flowed through the neighbouring property. Two staff members of the business next door (Vape Canyon) came over to complain.

I have added this complaint to our internal complaints register and reported this internally as an incident notify both our Operations manager and Safety, Health and Environmental manager.

My intention to manage this issue comes in 4 stages.

1. Install an air freshener in their reception. (We had one in earlier that they had good comments about)
2. Create a 24 hour document of intention to clean out sumps.
3. Include into our plant staff daily checklist to spray fence line with deodoriser (A1 Pleasant Plus)
4. Ask the neighbours to agree to monthly meeting for minimum of 4 months to monitor ongoing improvements and increase communication levels. (Optional)

Regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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Agreement with Intent to clean out trade waste sumps at 12 Broken Hill Road, Porirua. <i>Authorisation Required from Branch Manager & occupants of neighbouring property (10 Broken Hill Road)</i>	
Intended Date of works:	
Intended time of works:	
Contracted Vacuum truck Company:	
Reason for trade waste cleaning:	Annual maintenance / Blockage, disruption to trade waste Other: _____
Please state reason for not accepting the above request:	

Name and signature

Blair Chalmers _____ (Date) _____
 (Interwaste Dept Manager)

Signature

_____ (Date) _____
 (Occupants of neighbouring property)

Signature

FILE NOTE

DATE Friday 19 March 2021

AUTHOR Emily McDowall

SUBJECT Spot compliance visit to Interwaste Porirua

FILE NUMBER WGN110357

I arrived on site at 10.40am. Reporting to reception, I presented my warrant and was told that Blair Chalmers, Interwaste Wellington Branch Manager, would be on site in around 15-20 minutes.

When Blair arrived we discussed matters concerning Interwaste's consent and the two recent odour notifications at his office. I showed Blair my warrant.

Matters of discussion included:

- There is generally only one person working at a time during the weekend, e.g. a driver.
- Staff are aware of the requirement to close the garage doors promptly and have received training on this. All vehicles have been fitted with remotes which allow drivers to close the doors automatically behind them rather than first needing to exit their vehicles.
- Skips containing processed, non-infectious sharps waste are stored at the back of the site, a maximum of two skips at any one time. Skips are picked up Tuesday & Thursday mornings.
- The three small autoclaves were replaced with one, larger autoclave around five years ago.
- Blair undertakes monthly site inspections, not just for the regional council aspects of the site but for health and safety aspects, cleanliness etc.
- Interwaste has a Wellington Operations Manual which Blair will send me. (I'd asked if the "Operations and Maintenance Manual" required under condition 11 was ever submitted.)
- Staff fill out a biofilter checklist on a daily basis, e.g. checking the flow rates are correct.
- Dead large and small animals (vet school quarantine waste) are occasionally stored on site in skips. They are stored for no longer than about 5mins before the skips are picked up. The quantities of animal carcasses have decreased – in the past this might be a 9m³ skip once a month, now it is around 6x 240L wheelie bins once a month.
- The volumes of quarantine waste coming to the site have decreased due to the impacts of Covid-19 on international aviation and shipping travel, however, quantities of medical waste have increased due to the vaccination roll-out.
- Clearing out the sumps is a smelly business, Interwaste has consulted with neighbours in the past to find times of day which are least disruptive for neighbours.
- Cynotoxic waste is stored in enclosed bins until it is shipped to Australia for processing.
- Medical waste that has arrived on-site is stored in secure, lined transport units.
- The property is bunded apart from the stormwater drain at the back.

- Interwaste has a gold accreditation from EnviroMark.

Blair showed me around the site at my request. I was shown all the areas I asked to inspect. I have included photographs in Appendix A. Some impressions:

- There was a strong, unpleasant odour when the doors of the container holding the baked beans bags were opened.
- I think what the notifier would have observed with the 'tap' incident was the truck wash, the water turned red from iodine which is used as a disinfectant (MPI-approved, the name might be Iodophor, it is also used on the foot pads at the entrances/exits of the facility), overflowing onto the concrete pad, perhaps to such an extent that water was making its way towards the back of the site (e.g. perhaps the tap was left on).
- There was a strong, unfamiliar and very unpleasant odour directly beside the skip containing the medical waste that had already been processed. This may have been the unusual smell which Lloyd had described, as it did not smell like faeces or rubbish but was a strange smell which was difficult to describe. A number of flies were hanging around the bags, presumably attracted by the smell.
- One or two flies also buzzed around the empty skip, and Blair remarked that because they are waste skips there will always be residual odour which attracts flies.
- Some flies could be seen at the small vent-like openings at the top of the secure containers holding the medical waste still to be processed. An unpleasant smell was obvious when I approached these containers, however, I considered the smell of the open skips containing the processed waste to be more unpleasant.
- I could not see into the biofilter as the sides were very high. A ladder needs to be used to access the top of the biofilter.
- The inside of the facility appeared very clean and well-ordered.
- All waste to be processed was contained in yellow bags. Some bags on the top of the pile had visible blood on them, but other than this it was not possible to tell what was inside the bags. Two male staff members worked on the factory floor sorting the bags.
- As I stood on the factory floor, a background smell became more pungent. It smelt a bit like petrol and I asked Blair if a truck's engine was on as I felt like I could smell petrol fumes. The smell became very overpowering, to the extent that I almost felt like it was harder to breathe and my eyes started to sting. The smell was highly unpleasant in that it was powerful and felt intuitively like it was not healthy to breathe in. The workers did not seem to notice the smell as they carried on as normal. Blair told me that this was the smell of formalin which forms part of the medical waste stream.

I had a quick debrief with Blair at the end of my site visit. Blair promised to send me the Ops Manual and some other documentation, he sent this through shortly after the site visit. I arrived back at GWRC at around 12.45pm after a drive time of 37mins so I estimate that I left the site not long after midday.

Appendix A: Photographs from the visit



Wheel wash



The tap with the red handle is controlled by one of the levers on the tap on the wall. The other option is for fresh water. The wheel wash drains to trade waste.



The tap which the notifier was likely referring to.



A demonstration of the truck wheel wash. The disinfectant is MPI-approved and contains iodine which stains the water red over time. Water collects in the depression before it drains away. Sometimes it may creep onto the concrete pad.



View into one of the containers holding bags of [REDACTED] baked beans.



Bagged waste which Interwaste cannot process but which is being stored prior to export overseas once Interwaste's Basel permit comes through.



Stormwater drain along the site's northern boundary.



Skips holding medical waste which has been sterilised in the autoclave and which is now destined for landfill.



Second, empty skip which had a residual smell.



Secure containers which hold medical waste which is yet to be processed on-site.



Side of the biofilter.



Medical waste which is being processed today.



Ducting connected to the biofilter.



The blue tags are where emissions monitoring is conducted.
The flow level is shown on the slide ruler.



View of the interior of the processing facility, the autoclave is the black machine in the centre.



Bags of medical waste to process.



Entry point for the delivery trucks.



Where the trucks' contents are weighed.



Bags of medical waste to be processed. Processed medical waste is taken to landfill twice daily.



The three-tiered sump system in the driveway which is connected to trade waste.

Emily McDowall

From: Emily McDowall
Sent: Friday, 26 March 2021 4:21 pm
To: admin@vapecanyon.com
Subject: Following up on your recent odour notifications - WGN110357

Hello Chris, Lloyd [REDACTED]

Just an update about our investigation of your recent odour complaints at 10 Broken Hill Road. I mentioned this on the phone to [REDACTED] before, but wanted to record this in writing for you as well.

I did an unannounced inspection of Interwaste last Friday 19th March – I talked to Blair the site manager and he showed me around.

Interwaste have a biofilter which treats air discharges from their autoclave (machine which sterilises the medical and quarantine waste which they process). The biofilter is in good working order and inspections are carried out regularly (with reports sent to us annually) to ensure that the biofilter is operating correctly. I don't have any concerns about the biofilter.

Interwaste is aware that their garage door should not be opened for more than ten minutes. Staff receive training on this and I've been told that this has been raised again at recent meetings following your notifications. Interwaste has installed remote controls in all their vehicles, meaning that drivers can close the roller doors without having to exit their vehicles.

However, it seems that staff sometimes forget to close the door promptly all the same. Please continue notifying us when the door is opened for longer than ten minutes, as you have been (and ideally write down the time when you first noticed the door was open, and then the time when the door was again closed). If the door is opened for longer than ten minutes on a regular basis, and if GWRC staff are of the opinion that odours past the property boundary are offensive and objectionable, under Interwaste's consent we can require that an alarm is installed on the roller door. This is an option we could look into if that threshold was reached.

Interwaste stores waste pre- and post-processing in their yard. Waste which is still to be processed is stored in secure containers; I could not smell anything from these containers until I was very close to them. These containers are stored at the furthest possible distance from the property boundary you share with Interwaste. Waste which has been processed through the autoclave, and is therefore clean, is stored in skips behind the shipping containers. The skips are located here to again be as far as possible from neighbours. I detected an odour from these skips, however it was again not apparent until I was close to the skips (but not as close as with the secure containers).

When you report odours to council, please describe the odour and let us know whether or not the roller doors are opened. The reason is so that we can pinpoint the source of the odour – is it coming from within the factory, or from the factory yard?

Interwaste has a truck wash at the front of their building. A disinfectant is added to the water used on the truck wash which can stain this water a red-brown colour. Possibly what you reported to us as a discharge from the tap. If you have any photos of this I will take a look, but as I've mentioned you shouldn't enter the site again without an invitation (apart from walking up to the reception).

Staff at GWRC are rostered on as 'duty officers' responding to incidents. That means that you'll get different people calling you back in response to any notifications that you make to council. However the duty officer should let me know about your notification as I'm the compliance officer for the site, so I keep track of any notifications received. I will email my team now to remind them of this too.

Next week I am on annual leave, but I am back on Wednesday 7th April.

Kind regards, Emily



Emily McDowall

Resource Advisor Kaitohutohu – Environmental Regulation

Greater Wellington Te Pane Matua Taiao

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100 Cuba Street, Wellington

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Emily McDowall

From: Emily McDowall
Sent: Friday, 26 March 2021 4:49 pm
To: Emily McDowall
Subject: Notes from phone call to [REDACTED] re. formalin smelt at Interwaste 19.03.21

Notes from phone call to [REDACTED] this afternoon 26.03.21

- Formaldehyde metabolises fast
- Same thing as formalin
- It's used to preserve organs, so the point is you shouldn't be alive by then! It stops living processes e.g. decomposition, in its tracks. It's listed as group one carcinogenic under the IARC guidelines (International Agency for Research on Cancer).
- [REDACTED] thought what I'd smelt didn't sound good
- A workplace health and safety issue unless levels were high enough that emissions were escaping into the environment; but we'd need the advice of an air discharge expert on this
- He checked the Workplace Exposure Standards (10th edition). The 'ceiling' is 1ppm (part per million) exposure. Compare with petrol which is 300ppm for instance (so it's pretty potent).
- He checked the odour threshold for formaldehyde; this is 0.2 to 0.4 mg/m³ (which is around 0.16 to 0.32 ppm).
- The upshot is that if I could smell it strongly, and my eyes were hurting, than levels would have been close to if not exceeding (possibly well exceeding) the workplace exposure limits.
- Danger is repeated exposure for the workers.
- I mentioned where I was standing was perhaps 10-15m away from the workers.
- [REDACTED] recommended that I report this to WorkSafe, so that I could feel comfortable in having passed this on to the right people to investigate if they see fit.

From: Emily McDowall
Sent: Friday, 26 March 2021 4:21 PM
To: [REDACTED]
Subject: cost code for Interwaste - formalin query

Hi [REDACTED]
Thanks for your help before with the formalin query, I've notified WorkSafe and will let the site manager know I've done this.
The cost code to confirm is 335/110357/02.
Have a good weekend! Emily



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Emily McDowall

From: Emily McDowall
Sent: Friday, 26 March 2021 5:23 pm
To: 'Blair Chalmers'
Subject: Consent holder follow up from recent odour notifications - Interwaste WGN110357

Hello Blair,

I've been finishing off some tasks today before going on holiday and finally got a chance to read over the additional documents you sent me and to get back in touch with the notifier again. Thanks again for answering all my questions and for providing those documents.

Below is what I've emailed the notifier (anonymised) and my update around our team.

For Interwaste, please keep stressing to staff the importance of closing the garage door promptly. If we can get this right it'll be an easy fix and might prevent most of the notifications we've been receiving.

I wondered if the blue skips holding the processed medical waste should be covered? I don't have evidence to connect the odour to this source – future notifications, if these are made, might help us determine this. However, if it is easy for Interwaste to cover these skips in some way, such as how (I think) the skip holding waste being processed on a given day was covered, I imagine this can't hardly hurt.

Reading the Ops Manual, it sounded like animal carcasses should, or at least can, be stored in a refrigerated container. Again, I can't connect the odour notifications to the storage of animal carcasses, but I did notice this in the report and don't think you'd mentioned to me that those carcasses are refrigerated at all, so perhaps something to investigate.

When it's time to renew your consent, I think it'll be important to capture the storage of dead animals, and also the odour from the formalin, as it doesn't look like these aspects have been covered in the officer's report containing the rationale behind the consent conditions. The reason for covering animal wastes is to make sure we've analysed all major potential odour sources, and the reason for the formalin is because it *may* be necessary for an air discharge expert to ensure emissions getting into the environment are safe.

Further on the formalin, I passed on to WorkSafe this afternoon via a phone call that I did detect this smell very strongly when I was in the factory. I talked to our consultant chemist today about formalin, and based on his advice decided that: this is not something that GWRC would follow up on, but it was appropriate for me to notify WorkSafe so they can decide whether or not to investigate. WorkSafe have my number and yours (cellphone), I've mentioned you commissioned an Occupational Hygienist and that you have other procedures for formalin that they could enquire about if they deem necessary. They may or may not follow up.

Once we have some more clarity around the source of the odour, it may be that there are other actions required to bring Interwaste into compliance with your consent i.e. no offensive and objectionable odours beyond the property boundary. In the meantime it's just a matter of focusing on the garage door requirement, and perhaps looking into those other matters if you see fit.

I'm away until Wednesday 7th March and won't be checking emails or my work phone. But appreciate you might have queries and given that I didn't have a chance to talk to you on the phone today please feel free to call me

Kind regards,
Emily

From: Emily McDowall

Sent: Friday, 26 March 2021 4:32 PM

To: Consents&Compliance1 (Consents_Compliance1@greaterwellington.onmicrosoft.com)

<Consents_Compliance1@greaterwellington.onmicrosoft.com>

Subject: If you get odour complaints about Interwaste when on duty - WGN110357

Hi all,

Just a heads up for when you're on duty. If you get a complaint about Interwaste, 12 Broken Hill Road, Kenepuru / Porirua, please pass it on to me as the compliance officer. And please can you do the below...

When you ring back the notifier please ask them:

- When did they start noticing the smell?
- What exactly did it smell like? (get as good a description as possible)
- How strong and unpleasant was it?
- Was the roller door at Interwaste open when they noticed the smell?
- And ideally – when did they first notice the roller door was open, and when did they see it was closed again?

The reason is I'm trying to pinpoint the source of the smell, probably from within the factory but there are also possible odour sources in the factory yard, plus the sumps are cleaned out every so often etc. Also Interwaste have a condition requiring them to close their roller door after ten minutes, but this hasn't always happened even though they try to educate staff about this.

If you can notify Blair Chalmers, the site manager by emailing blair@interwaste.co.nz and cc'ing me that'd be great. (And phone Blair on 021-727-138 if it's during the week so he can get staff to close the door!) Or just forward to me and I'll follow up with Blair.

Even better if you go out to the site to have a sniff for yourself (I'll owe you a coffee?!), as there is a condition by which we can require they install an alarm on the door if it's regularly open longer than ten minutes *and* if GWRC staff perceive the odour as O&O. But I get that it might not be worth your time, particularly if the door is soon afterwards closed!

Thanks heaps, Emily

From: Emily McDowall

Sent: Friday, 26 March 2021 4:21 PM

To:

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Version: 1.0

Revision Date 22.10.2018

Print Date 22.10.2018

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

1.1 Product identifier

Trade name : IODOPHOS

1.2 Relevant identified uses of the substance or mixture and uses advised against

1.3 Details of the supplier of the safety data sheet

Company : Chemetall (New Zealand) Limited
664 Rosebank Rd, Avondale
1026 Auckland
Telephone : +649 820 3888
Telefax : +649 820 3979
Contact person product safety : Technical Manager
Telephone : +61 3 9729 6253
E-mail address : nzadmin@basf.com

1.4 Emergency telephone number

Emergency telephone number : 0800 734 607 AFTER HOURS
Outside NZ : +61 3 9663 2130

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Skin corrosion/irritation : Category 2

Serious eye damage/eye irritation : Category 1

GHS label elements

Hazard pictograms :



Signal word : Danger

Hazard statements : H315 Causes skin irritation.
H318 Causes serious eye damage.

Precautionary statements : **Prevention:**
P262 Do not get in eyes, on skin, or on clothing.
P264 Wash skin thoroughly after handling.
P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response:
P302 + P352 IF ON SKIN: Wash with plenty of soap and water.
P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and

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easy to do. Continue rinsing.
P310 Immediately call a POISON CENTER or doctor/ physician.
P332 + P313 If skin irritation occurs: Get medical advice/ attention.
P362 Take off contaminated clothing and wash before reuse.

Other hazards which do not result in classification

The information required is contained in this Safety Data Sheet.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical name	CAS-No.	Concentration (% w/w)
2-Pyrrolidinone, 1-ethenyl-, homopolymer, compd. with iodine	25655-41-8	>= 10 - < 30

SECTION 4. FIRST AID MEASURES

General advice : First aider needs to protect himself.
Move out of dangerous area.
Take off contaminated clothing and shoes immediately.

Inhalation : Move to fresh air.
If symptoms persist, call a physician.

Skin contact : Wash off with soap and plenty of water.
If symptoms persist, call a physician.

Eye contact : In case of eye contact, remove contact lens and rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes.
Call a physician immediately.

Ingestion : Rinse mouth with water.
Do NOT induce vomiting.
Consult a physician.

Most important symptoms and effects, both acute and delayed : No information available.

Notes to physician : Treat symptomatically.
For specialist advice physicians should contact the Poisons Information Service.

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media : Carbon dioxide (CO2)
Dry powder
Alcohol-resistant foam

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Print Date 22.10.2018

Water spray

Unsuitable extinguishing media : High volume water jet

Specific hazards during fire-fighting : Heating or fire can release toxic gas.

Special protective equipment for firefighters : In the event of fire, wear self-contained breathing apparatus.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures : Wear personal protective equipment.
For further information see Section 8 of the safety data sheet.
For disposal considerations see section 13.

Environmental precautions : Do not flush into surface water or sanitary sewer system.
Avoid subsoil penetration.

Methods and materials for containment and cleaning up : Ensure adequate ventilation.
Contain spillage, soak up with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and transfer to a container for disposal according to local / national regulations (see section 13).

SECTION 7. HANDLING AND STORAGE

Advice on protection against fire and explosion : Keep away from sources of ignition - No smoking. Normal measures for preventive fire protection. Take precautionary measures against static discharges.

Advice on safe handling : Provide sufficient air exchange and/or exhaust in work rooms.
Ensure that eye flushing systems and safety showers are located close to the working place.
To avoid risks to man and the environment, comply with the instructions for use.

Hygiene measures : Take off contaminated clothing and shoes immediately.
Keep away from food, drink and animal feedingstuffs.
Wash hands before breaks and immediately after handling the product.
Avoid contact with skin and eyes.
Do not breathe vapour.
Do not breathe spray.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Contains no substances with occupational exposure limit values.

Engineering measures : Ensure adequate ventilation, especially in confined areas.

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Print Date 22.10.2018

Personal protective equipment

Respiratory protection	: In case of insufficient ventilation, wear suitable respiratory equipment according to AS/NZS 1715/1716 Recommended Filter type: Type B
Hand protection Material	: Gloves: PVC, Nitrile, Neoprene or natural rubber according to AS/NZS 2161.1
Remarks	: Protective gloves complying with AS/NZS 2161.1. The exact break through time can be obtained from the protective glove producer and this has to be observed. Gloves should be discarded and replaced if there is any indication of degradation or chemical breakthrough.
Eye protection	: Tightly fitting safety goggles or safety glasses with side shields. Eye protection (AS 1336/1337)
Skin and body protection	: Chemical resistant protective clothing according to AS3765/2210
Protective measures	: Handle in accordance with good industrial hygiene and safety practice. Ensure that eye flushing systems and safety showers are located close to the working place.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: Liquid
Colour	: brown
pH	: ca. 1
Boiling point/boiling range	: > 100 °C
Flash point	: > 99 °C
Density	: 1.08 g/cm ³
Solubility(ies) Water solubility	: soluble
Explosive properties	: no explosion risk

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: No dangerous reaction known under conditions of normal use.
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: None known.

Version: 1.0

Revision Date 22.10.2018

Print Date 22.10.2018

Conditions to avoid : Keep away from open flames, hot surfaces and sources of ignition.

Hazardous decomposition products : No decomposition if stored and applied as directed.

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute inhalation toxicity : Acute toxicity estimate: > 20 mg/l
Exposure time: 4 h
Test atmosphere: vapour
Method: Calculation method

Skin corrosion/irritation

Product : No data available

Serious eye damage/eye irritation

Product : No data available

Respiratory or skin sensitisation

Product : No data available

Chronic toxicity

Germ cell mutagenicity

Product : No data available

Carcinogenicity

Product : No data available

Reproductive toxicity

Product : No data available

STOT - single exposure

Product : No data available

STOT - repeated exposure

Product : No data available

Aspiration toxicity

Product : No data available

Version: 1.0

Revision Date 22.10.2018

Print Date 22.10.2018

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

No data available

Persistence and degradability

Product:

Biodegradability : Remarks: No data available

Bioaccumulative potential

Product:

Bioaccumulation : Remarks: Bioaccumulation is unlikely.

Mobility in soil

Product:

Distribution among environmental compartments : Remarks: No data available

Other adverse effects

No data available

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Dispose of contents/ container to an approved waste disposal plant.

Packaging : Dispose of as unused product.

SECTION 14. TRANSPORT INFORMATION

International Regulations

IATA-DGR

UN/ID No. : UN 1805
Proper shipping name : Phosphoric acid, solution
Class : 8
Packing group : III
Labels : Corrosives
Packing instruction (cargo aircraft) : 856
Packing instruction (passenger aircraft) : 852

IMDG-Code

UN number : UN 1805
Proper shipping name : PHOSPHORIC ACID SOLUTION
Class : 8

Version: 1.0

Revision Date 22.10.2018

Print Date 22.10.2018

Packing group : III
Labels : 8
EmS Code : F-A, S-B
Marine pollutant : no
Remarks : Acids

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

ADG

UN number : UN 1805
Proper shipping name : PHOSPHORIC ACID, SOLUTION
Class : 8
Packing group : III
Labels : 8
Hazchem Code : 2R

SECTION 15. REGULATORY INFORMATION

Safety, health and environmental regulations/legislation specific for the substance or mixture

The product is classified and labelled in accordance with EC directives or respective national laws.

Regional or national implementations of GHS may not implement all hazard classes and categories.

Standard for the Uniform : No poison schedule number allocated
Scheduling of Medicines and
Poisons

EPA Group Standard : Cleaning Products (Corrosive)
HSR002526

Refer to the Group Standard document for further information.

SECTION 16. OTHER INFORMATION

Full text of other abbreviations

AICS - Australian Inventory of Chemical Substances; ANTT - National Agency for Transport by Land of Brazil; ASTM - American Society for the Testing of Materials; bw - Body weight; CMR - Carcinogen, Mutagen or Reproductive Toxicant; CPR - Controlled Products Regulations; DIN - Standard of the German Institute for Standardisation; DSL - Domestic Substances List (Canada); ECx - Concentration associated with x% response; ELx - Loading rate associated with x% response; EmS - Emergency Schedule; ENCS - Existing and New Chemical Substances (Japan); ErCx - Concentration associated with x% growth rate response; ERG - Emergency Response Guide; GHS - Globally Harmonized System; GLP - Good Laboratory Practice; IARC - International Agency for Research on Cancer; IATA - International Air Transport Association; IBC - International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk; IC50 - Half maximal inhibitory concentration; ICAO - International Civil Aviation Organization; IECSC - Inventory of Existing Chemical Substances in China; IMDG - International Maritime Dangerous Goods; IMO - International Maritime Organization; ISHL - Industrial Safety and Health

Version: 1.0

Revision Date 22.10.2018

Print Date 22.10.2018

Law (Japan); ISO - International Organisation for Standardization; KECI - Korea Existing Chemicals Inventory; LC50 - Lethal Concentration to 50 % of a test population; LD50 - Lethal Dose to 50% of a test population (Median Lethal Dose); MARPOL - International Convention for the Prevention of Pollution from Ships; n.o.s. - Not Otherwise Specified; Nch - Chilean Norm; NO(A)EC - No Observed (Adverse) Effect Concentration; NO(A)EL - No Observed (Adverse) Effect Level; NOELR - No Observable Effect Loading Rate; NOM - Official Mexican Norm; NTP - National Toxicology Program; NZIoC - New Zealand Inventory of Chemicals; OECD - Organization for Economic Co-operation and Development; OPPTS - Office of Chemical Safety and Pollution Prevention; PBT - Persistent, Bioaccumulative and Toxic substance; PICCS - Philippines Inventory of Chemicals and Chemical Substances; (Q)SAR - (Quantitative) Structure Activity Relationship; REACH - Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals; SADT - Self-Accelerating Decomposition Temperature; SDS - Safety Data Sheet; TCSI - Taiwan Chemical Substance Inventory; TDG - Transportation of Dangerous Goods; TSCA - Toxic Substances Control Act (United States); UN - United Nations; UNRTDG - United Nations Recommendations on the Transport of Dangerous Goods; vPvB - Very Persistent and Very Bioaccumulative; WHMIS - Workplace Hazardous Materials Information System

Further information

Other information : The information provided is based on our current knowledge and experience and apply to the product as delivered. Regarding the product properties, these are not guaranteed. The delivery of this safety datasheet does not free the recipient of the product from his own responsibility to follow the relevant rules and regulations concerning this product.

Date format : dd.mm.yyyy

AU / EN

Date	Mini Form #	Time	Manager	Wind Direction
3/08/2016		1.30pm	Hamish Sisson	
27/7/2016		10:30am	Blair Chalmers	
8/08/2016		7.18pm	Blair Chambers	South -
10/01/2018		2:10pm	Blair Chalmers	Still
20/02/2019		11am	Blair Chalmers	Light - still
2/09/2019		12:10pm	Blair Chalmers	Still
23/07/2020	60554	14:40	Blair Chalmers	South -

Complainant	Contact details
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	
<p>10 Broken Hill Road. Vape Canyon have complained that the smell is quite bad wafting through their site. They noticed the garage doors were open for a long time.</p>	
<p>10 Broken Hill Road. Vape Canyon have approached Blair to complain about the smell (Wattie's being cooked) and claim the smell travels through their building every day. It is starting to effect their business.</p>	
<p>We had employed Dawson's to come clean out our sumps and storm water drains, this created a strong odour. The next door neighbours came to complain that this smell had gone through their whole site and had lost a couple of customers because of it. They were quite upset.</p>	

Remedial action

Reiteration of process for disposal of animal waste.
Implementation of changes to

Meeting held

Following up on BC's email warning of possible odour with complaint that did smell odour

[REDACTED]

Doors immediately closed and discussed with all staff.

Doors immediately closed and discussed with Gerry and Ray.

Sump cleaning had finished as I was talking with them. I explained that I would register this as a formal complaint and notify the council.

Follow up actions / comments

Complaint about excessive flies during the weekend. The flies were caused by animal waste being left outside in the skips over the weekend rather than the skip being taken to landfill immediately as per our standard operating procedure. Refer letter of 11.3.16

[REDACTED]

No follow up required as one off due to maintenance. Letter sent to WRC noting complaint. Refer letter of 12.8.16 to WRC. Also refer email of 9 August 2016

[REDACTED]

No follow up required.

Follow up meeting to be held with neighbours. Follow up held 07/10/2020 and comments were good, neighbours are happy.

I am proposing 4 step process to work with our neighbours. 1. Install an air freshener and schedule quarterly service. 2. Daily deodoriser spray down the fence line. 3. Create a 24 hour notice of intent to clean sumps form. 4. Request monthly meeting with neighbours for minimum of 4 months to monitor changes. FOLLOW UP: Friday 31st July. I went and spoke with the team next door to inform them of my movements and to discuss my intentions. This was met with relief and positivity. The manager next door explained that follow up meetings were not necessary.

Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Friday, 19 March 2021 12:34 pm
To: Emily McDowall
Subject: Interwaste Wellington supporting documents
Attachments: Interwaste_HealthRA_210209_V2.pdf; IWL Wellington Operations Manual March 2020 LF.pdf; 15-Feb-2021-Blair-Chalmers.pdf; Wellington Complaints register, Bio filter PH Test & Airflow Results.xlsx; 221018, IODOPHOS NZ SDS.pdf

Good afternoon Emily

Thank you for your visit today to our site in Porirua. It was nice to put a face to the name.

As requested I have attached several documents showing our compliance and general information around our facility.

- Wellington Operations manual, this document goes in to details of our processes and covers off consents and conditions,
- A copy of one of our monthly site inspections to show the in depth detail of what we look at on a monthly basis to ensure we are keeping the site to a good standard,
- A copy of our complaints register that also has spreadsheets showing our PH testing of the biofilter and flow rate readings. (Please note this will be updated this month)
- A copy of a report from last month generated by an occupational hygienist contracted by us to do an assessment of our site and processes.
- The MSDS for the MPI approved disinfectant used in both the vehicle wheel wash and the internal foot pads.

Please let me know if there is anything else you would like me to send through to help work through the recent complaints.

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



International Waste Ltd

M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695
www.interwaste.co.nz



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contact us for a competitive quote.**

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Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Tuesday, 23 March 2021 12:50 pm
To: Emily McDowall
Subject: RE: WGN110357 - Site visit matters for me to follow up on and some follow-up Qs

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon Emily.

Yes that turned in to a lot of questions but I am more than happy to answer them for you. Please see my comments to each in green below.

I have given you some detailed answers to help you better understand what we do.

If you want to discuss any of this further please do feel free to call me at any time, if I do not answer I will return calls. I am covering 3 roles today and tomorrow so quite busy but always have my phone close by.

Regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Friday, 19 March 2021 5:54 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: WGN110357 - Site visit matters for me to follow up on and some follow-up Qs

Hello Blair,

I hope your various afternoon meetings have gone well. It was a very interesting inspection this morning, I have just been writing up some notes. No rush to read and reply to this email, I'm just writing it down now while it's fresh in my mind.

Here are a few aspects I plan to follow up on:

- I'll read over the documentation you've sent through, thanks again for this.
- It would be good for me to clarify with the notifiers the type of smells they experience at different times. These smells can be difficult to describe, and I think from their descriptions that what affects them the most is the smell from the factory when the garage doors are opened, and the smells from the skips (possibly including any skips containing animal carcasses), but I will chat to them again to get more clarity on this as this. To confirm this, it might be necessary for the notifier to keep reporting on odours over time, and for me to send the timing and descriptions to you. **I think asking them to report on dates and times they are experiencing odour coming from our site is a good idea, this will help us identify and remedy the issues quickly and put actions in place to avoid them occurring again (where possible).** I had a meeting with my team on Friday and explained in detail the conditions of our consent including the garage doors. Staff have been warned for the last time and I have notified all staff on site that anyone seen to be leaving the doors open for more than 10 minutes could be brought in for disciplinary action. As I have mentioned, animals will only be placed in the skips no more than 5 minutes before the skip is picked up, if more than 5 minutes, then they are brought inside.
- It would be good for me to provide reassurance to the notifiers about some of what they raised with me. For instance, perhaps I could explain the use of iodine in the wheel wash which is likely what the notifier perceived as 'dirty waste'. The notifier also believed the skips were being 'hidden' from view behind the containers, when in fact the skips were moved here to be further away from neighbours. I could possibly also explain in general terms what your business does, although this is basically on your website so shouldn't come as a surprise to them. I'd be keen to talk to you about a way to bring up matters like this with the notifiers in a way that isn't revealing any commercially sensitive information. **The skips are not being hidden, it was agreed with the occupier of that premises prior to them that we would keep skips down the back of the driveway. I want to reiterate here that we are not trying to "pull the wool over anybody's eyes". We work to our companies vision and values and are in this business to help protect NZ and its environment by managing high risk waste. What we do here is no secret. We are a medical and quarantine waste disposal company and this branch covers the lower north island. What we do is commercially very important to the regions DHB's and other government agencies and being a waste disposal company, there will be some odour, it's the offensive odours that we work hard to avoid passing our boundary and will continue to do so. We are dedicated to ensuring we meet all of our consent and environmental expectations and this is highly documented and recorded in the various audits we undertake.**
- Biofilter: my impression was that your consent requires weekly visual inspections of the biofilter material. I think I picked up in your 2020 compliance report that this wasn't happening, I will double check this, but now that I see the biofilter I guess this is because a ladder is needed to view the medium, so it is not a quick task to complete. I thought I might ask an air discharge expert how essential visual reports are, given that other data is being collected about the biofilter. However I'm not particularly concerned about the biofilter, I think the odours which bother the notifiers are fugitive, not those treated by the filter. **It is part of our weekly checks that the biofilter is visually checked on a weekly basis, but all we are looking at is the wetness of the bark inside and the structural integrity of the ducting and container. The biofilter is assessed annually and is deemed to be working efficiently.**
- Possible ways to reduce the fugitive odours beyond the property boundary:
 - o Continued education for staff about the garage doors. It's great to hear about the remotes in the vehicles.
 - o GWRC can request a garage door alarm is installed if necessary. (The noise might annoy the notifiers too though!)
 - o Skips, if these are indeed a source of odour – can the skips containing processed waste be covered?
 - o Vegetation screening which you mentioned.
- Formalin / formaldehyde – I was surprised at how strong this was. I know the health aspect is the realm of WorkSafe, and perhaps the EPA is involved here, but this has made me wonder if this aspect was addressed

in the consent, or if technically the discharge of the particular chemical making up formalin would require a consent. Perhaps the formalin levels are something which might need to be monitored. This is something I have no knowledge whatsoever on, so I thought I would check in with our consultant chemist. When I read through the Ops Manual and WorkSafe report I might get more clarity on this. As I mentioned we have recently contracted an Occupational Hygienist to come on site for an assessment and to comment on the wastes that we process. The results of this report highlight that we are complying and following all necessary H&S recommendations. We have a standard operating procedure in place for processing formalin waste (all buffered – 10% formalin not pure formalin).

And here are a few questions from reading over my notes:

- I wondered if there were any animal carcasses (quarantine waste from vet schools) on site on the afternoon of Mon 15th March? I have checked our records and we did not have any animals on site on this day. I believe the odour on this day was caused by processing quarantined wheat used in the manufacture of dog biscuits. This can have a strong smell (offensive or not is up to the individual) and is only prominent for an hour or two during and post processing. We run a transitional facility here approved by MPI and we are MPI's preferred disposal company so the quarantine waste we process has been deemed as high risk waste to the biosecurity of the country so it is important to NZ that this is handled and disposed of in a safe and timely manner.
- Also in relation to the animal carcasses, I think you mentioned these are stored in wheelie bins for short periods of time before being disposed of (presumably to Spicer Landfill)? I think you said the carcasses aren't actually processed by Interwaste. So I wondered, why does Interwaste receive them for a short period, why do they not go straight from their destination to landfill, do they arrive as part of other deliveries of waste? I also wondered where the wheelie bins containing animal carcasses would be stored, would that be near the skips outdoors? And could you confirm the approximate length of time the wheelie bins would be stored at Interwaste, if the carcasses are bagged, and if they could be at Interwaste during the weekend? The reason I ask is because I would have imagined that animal carcasses are particularly smelly, especially if they have travelled from further away. This is a good line of questioning because animal carcasses do smell really bad! The reason these are collected by Interwaste is the landfills will not just accept animal carcasses for tipping, they must be treated as special waste and deep buried so we send these to Spicer landfill with our sharps waste that is consented by the local council (Porirua) each time. The Council & landfill must be notified and hole dug for burial. We send skips to landfill twice per week on Tuesday and Thursday so if the bins were to come in on a Thursday afternoon for example, they may stay on site here for up to 4 or 5 days before disposal. The bins that the animals are collected in will stay inside our processing area until tipped 5 minutes before landfill and are never kept outside. They do smell awful but this smell does not flow far away from the bins themselves (maybe 5-10m radius) and this is why they are kept inside in the "dirty" area of our plant.
- Do you know if the formalin / formaldehyde fumes are produced when medical waste goes through the autoclave – perhaps there is a chemical reaction when the chemical which comes in as part of the medical waste is exposed to heat? I'm wondering why that smell comes in waves, and if you could predict in advance which bags might produce more of that smell. Has the frequency of odours experienced from formalin increased due to the work associated with the vaccination roll-out? The formalin that comes in the medical waste stream is of small amounts generally. 50-100ml containers mostly. The larger generators of this waste have been identified and we issue separate bins for the collection of tissue samples in formalin and as per our SOP, these must be processed on the last load of the day. It is however near impossible to predict where all the formalin waste will come from as many medical practices etc will use small amounts of it but we do attempt to identify the customers when the formalin is present like it was the day that you were on site but this is not always easy as the waste is tipped into bulk carts for processing so could contain waste from 50 customers.
- A question out of curiosity, are the yellow bags of medical waste ripped open before being processed by the autoclave, or is everything processed in together? Just that the processed waste also appeared to be contained in yellow bags. We do our best to minimise any waste handling. So bags are not opened and only visually assessed as they are tipped into the large stainless steel carts. Being infectious waste we do not want our staff opening bags or handling the bags if possible. We do our best to educate our customers on what and what should not be put in the medical waste bins as per the NZS 4304 Management of Healthcare waste on a H&S level to our staff but we have no way of 100% guaranteeing what is put in these medical waste bins (honestly though it normally is just the medical waste). Also as per that NZS the tissue samples

must be processed as infectious waste so processing the formalin cannot be avoided and we have done our research and put preventative actions in place to minimise risk. There has not been one instance where someone has felt the effects of or smelt formalin (while being processed) even in large doses, outside of the building let alone by the boundary. This is another good reason why having the notifiers report on dates and times, so we can clearly identify where the issue lies.

This has turned into a lot of questions sorry!

It might be easier to chat over the phone about this next week. How about I get in touch via phone once I've had a chance to read through the additional information you sent me, particularly the Ops Manual, as that might answer some of my questions?

Kind regards, Emily



Emily McDowall

Resource Advisor Kaitohutohu – Environmental Regulation

Greater Wellington Te Pane Matua Taiao

021 191 9689

100 Cuba Street, Wellington

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From: Emily McDowall

Sent: Friday, 19 March 2021 1:26 PM

To: Blair Chalmers <blair@interwaste.co.nz>

Subject: RE: Interwaste Wellington supporting documents

Thanks so much Blair, and thanks for meeting me when I'd not announced my visit.

I look forward to reading through this documentation, I need to do some other tasks this afternoon but will get to this next week.

Enjoy the busy weekend! Emily

From: Blair Chalmers <blair@interwaste.co.nz>

Sent: Friday, 19 March 2021 12:34 PM

To: Emily McDowall <Emily.McDowall@gw.govt.nz>

Subject: Interwaste Wellington supporting documents

Good afternoon Emily

Thank you for your visit today to our site in Porirua. It was nice to put a face to the name.

As requested I have attached several documents showing our compliance and general information around our facility.

- Wellington Operations manual, this document goes in to details of our processes and covers off consents and conditions,
- A copy of one of our monthly site inspections to show the in depth detail of what we look at on a monthly basis to ensure we are keeping the site to a good standard,
- A copy of our complaints register that also has spreadsheets showing our PH testing of the biofilter and flow rate readings. (Please note this will be updated this month)
- A copy of a report from last month generated by an occupational hygienist contracted by us to do an assessment of our site and processes.
- The MSDS for the MPI approved disinfectant used in both the vehicle wheel wash and the internal foot pads.

Please let me know if there is anything else you would like me to send through to help work through the recent complaints.

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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Emily McDowall

From: Emily McDowall
Sent: Wednesday, 7 April 2021 11:52 am
To: Blair Chalmers
Subject: Odour notification from March #19284 [EMAIL]

Hello Blair,

I hope you had a good Easter break.

Please find for your records below an odour notification which came through to us on the afternoon of Wednesday 24th March. Apologies that I/we had not alerted you about this notification at the time; we won't be following up about this notification specifically any further.

Ngā mihi, Emily
021-191-9689

From: Environmental.Protection@gw.govt.nz <Environmental.Protection@gw.govt.nz>
Sent: Wednesday, 24 March 2021 2:11 PM
To: [REDACTED] <[\[REDACTED\]@gw.govt.nz](mailto:[REDACTED]@gw.govt.nz)>
Subject: Ozone Contact Centre # 19284 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 19284 [[View Transaction](#) >> [Click here to view your CC Transaction](#)]
Created: 24 Mar 2021 @ 02:09pm by [REDACTED]
Type/Subtype: Env Protection Incident / Env Protection Incident all types
Priority: 1 HOUR
Action: EMAIL
Your Position:

Message:

Transaction no. 19284, received 24 Mar 2021 at 02:09pm has been assigned to you.
Please Schedule the action immediately.

Notifier:

Source Parcel:

TA: Porirua City Council

Details: X wants to report an offensive smell. They believe the source of the smell is from Interwaste, which is a company in the building next door to them. There is an intermittent faeces smell during the whole day. Q> What is the Sink? A> Q> What is the Affected Site? A> Q> What is the Activity Type of the Source? A> Q> What is the Environmental Effect? A> Q> What are the Investigation Findings? A> Q> What is the Sub-Type? A>

Contact details:

Address: X BROKEN HILL ROAD

KENEPURU

PORIRUA 5022

Phone: day [REDACTED]

Temp phone: ; Ref:

Email:

This message was automatically generated by the Ozone Contact Centre

WF/30/0/0/0/AFTER/R/EMAIL/R/

Compliance monitoring assessment for International Waste Ltd

Consent No:	WGN110357	Date: 4 August 2021	Monitoring officer: Emily McDowall
Activity:	To discharge contaminants to air (namely odour) arising from the operation of a waste sterilisation facility.		

Your compliance rating

[34191]		LOW RISK NON-COMPLIANCE Most conditions met. Some action may be required
---------	--	--

Comments

Thank you for providing us with your annual report and for answering my many questions about Interwaste's processes when I was responding to three complaints about the site in March 2021.

I have given you a low risk non-compliance rating as you have not provided the results of the annual biofilter monitoring (required under condition 14 of your consent) which would assure us that the biofilter is operating as intended. It is good to hear that you have booked Pattle Delamore Partners (PDP) to undertake this assessment; please provide these results to GWRC as soon as possible.

In addition, I have reason to believe that the plant's door has been open for longer than ten minutes on at least one occasion and possibly multiple times within the past year (condition 16 requires doors to not remain open for longer than ten minutes at any one time while the plant is operating). It is good to hear that you have taken steps to avoid the instance of the door being open for too long, such as by providing remotes to truck drivers and by continuing to remind staff of their compliance responsibilities. Please continue to prioritise compliance with this consent condition going forwards.

Please note that the Greater Wellington Regional Council (GWRC) has a responsibility to enforce the Resource Management Act 1991 (RMA). Accordingly, you should take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your consent.

On this occasion we have decided not to take any further enforcement action given that you have demonstrated a willingness to improve your compliance performance – such as by holding a staff meeting to remind staff of the need to close the garage door promptly, and given that no further complaints allegedly relating to the site have been brought to my attention since March this year. However, we may not be so lenient should you receive another non-compliant rating in future. Accordingly, you should take all necessary steps to ensure you comply with your obligations under the Resource Management Act 1991, including all conditions of your consent.

Your consent incurs variable monitoring charges at your consent anniversary. These charges will likely increase to reflect any additional time spent monitoring your consent due to non-compliance.

Summary of your compliance against the conditions of your consent

Condition no.	Condition summary	Comment/action required
6	No discharges to air which are noxious/dangerous/offensive/objectionable at or beyond the legal boundary of the property, in the opinion of a GWRC enforcement officer.	I received a number of odour complaints thought to relate to Interwaste's activities in March 2021 (on 15, 18 and 24 March). On 19 March 2021, I conducted a spot site visit. I smelt some strong odours whilst on-site, both inside the plant and outside, and I discussed the management of odours with you. I did not judge any odours to meet the threshold of being noxious, dangerous, offensive or objectionable at or beyond the property boundary, and I have not been notified of any further odour complaints said to relate to the site since March 2021.
7	All emissions control equipment to be well-maintained and operating correctly in a fully functional state at all times.	I do not have reason to believe that emissions control equipment is not well-maintained, however I have not yet viewed the yearly biofilter assessment, as mentioned below.
10	Maintain a record of volume and nature of material processed by the waste sterilisation units, with this record included in the annual report.	You provided GWRC with an annual total of the weight of waste processed and an explanation of the change in processing volumes following Covid-19 restrictions. You have not provided a description of the nature of material processed on-site, however I did discuss this with you in person during my site visit and via subsequent email correspondence which is saved to file. Please provide a summary of the nature of waste processed, along with the volume of waste, in your 2022 annual report. This can be brief, for instance (made-up figures) – 70% hospital waste, 20% Covid-19 vaccination response waste, 10% veterinary waste.
14	Employ an appropriately qualified person to undertake a comprehensive assessment of the performance of the biofilter on an annual basis. Provide the results of the assessment, including any recommendations and a timetable for actions to be taken, to GWRC with the annual report.	You informed me that staff from PDP were booked to undertake this assessment on 2 nd August 2021. Please provide GWRC with this report and your proposed actions to address any concerns about the biofilter, if relevant.
15	Record the results of specific parameters for the biofilter on a	Thank you for providing these monitoring records. I can see that the biofilter's pH has

	continuous/weekly/quarterly basis (differential pressure, pressure, visual observations, media moisture content, pH levels).	remained stable at 7 and that the airflow has not exceeded 100m ³ /hour. You let me know that the biofilter is checked (visually) weekly, with weeds removed as required.
16	The plant door to not remain open for longer than ten minutes at any one time. GWRC to be notified if the doors are required to be opened for a period exceeding ten minutes during plant operation.	The plant door was likely open for a period of time exceeding ten minutes on 18 March 2021. You let me know that staff have been reminded of consent conditions and warned that leaving the door open for longer than ten minutes might result in internal disciplinary action. GWRC has not received any further notifications of the door being open too long. Please ensure you are meeting this condition going forwards, for instance by continuing to remind staff of compliance responsibilities and educating new staff on the need to close the plant door promptly.
18	Annual report submitted to GWRC by 1 August each year, including the relevant monitoring results and data required under other consent conditions.	You submitted your 2021 annual report on 30 July 2021. The report contained all required information with the exception of the yearly biofilter assessment which is forthcoming.
19	Keep a record of complaints received alleging adverse effects from your operations.	Your annual report contains a record of complaints received throughout 2021 and actions taken in response to these complaints.

GWRC compliance rating system

	<p>FULL COMPLIANCE – All conditions met – well done! No further action required</p> <ul style="list-style-type: none"> All conditions assessed are met including supplying information and/or records
	<p>LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required</p> <ul style="list-style-type: none"> Minor breach of effects based conditions or works outside scope of consent with low risk of adverse environmental effects Breach of conditions which is technical in nature (eg, failure to submit monitoring report or records)
	<p>MODERATE NON-COMPLIANCE – Some condition(s) not met. Action required</p> <ul style="list-style-type: none"> Repeated failure to supply monitoring report or records. Breach of conditions where there are some environmental consequences and/or moderate risk of adverse environmental effects
	<p>SIGNIFICANT NON-COMPLIANCE – Many condition(s) not met. Immediate action required</p> <ul style="list-style-type: none"> Breach of conditions where there are significant environmental consequences and/or high risk of adverse environmental effects

Consent monitoring charges

Each consent receives a consent monitoring charge from GWRC.

This charge is made up of three parts:

- A *customer service charge* that covers the administrative cost of your consent(s);
- A *compliance monitoring charge* that covers all actual and reasonable time associated with assessing compliance with your consent(s) including the time spent visiting and assessing your site, information and reports you submit, file notes, travel time and reporting to you on compliance with your consent(s); and
- A *State of the Environment (SoE) charge* that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity.

For further information on consent monitoring charges, please see our *Resource Management Charging Policy*.

Emily McDowall

From: Emily McDowall
Sent: Wednesday, 4 August 2021 6:18 pm
To: Blair Chalmers
Cc: [REDACTED]
Subject: Low-risk non-compliance rating for Interwaste 2020-21 - WGN110357
Attachments: Interwaste 2020-21 Compliance Report - WGN110357.pdf

Kia ora Blair,

Thank you for providing this documentation. Attached is your annual compliance report for 2020-21. I've given Interwaste a rating of low-risk non-compliance this year – my reasoning is explained in the attachment but do let me know if you have any questions. We look forward to receiving the PDP report about the biofilter at the end of August / start of September.

I'm cc'ing my colleague [REDACTED] who will be the new compliance officer for this consent; [REDACTED] [REDACTED] will be your point of contact going forwards, and you can also send documentation to notifications@gw.govt.nz quoting consent number WGN110357.

Kind regards,
Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Friday, 30 July 2021 3:05 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Subject: RE: Annual report due 1 August 2021

Good afternoon Emily

Please find attached our annual report and supporting spreadsheet showing details of complaints, PH testing and Bio Filter airflow.

We have scheduled PDP to perform our annual bio filter inspection but unfortunately they are not due here until this Monday and reports can take up to two weeks to be finalised. I do not expect any actions to be generated from the report as the bio filter is still operating in good condition.

The three registered complaints this year were disappointing, this is the most we have received in a 12 month period since we started here in 2012 and all three were in the month of March. I hope the "anonymous" complainants are not experiencing any further issues as we have not heard anything from the council or the neighbours in a few months now.

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



International Waste Ltd

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From: Emily McDowall <Emily.McDowall@gw.govt.nz>

Sent: Monday, 31 May 2021 5:26 PM

To: Blair Chalmers <blair@interwaste.co.nz>

Subject: Annual report due 1 August 2021

Hello Blair,

We have an internal due date for air discharge annual compliance of 30th June.

Often this date doesn't align with our consent conditions and your consent is no exception!

Just a heads up now though while I think of it that I'll be expecting your annual report by 1st August this year, and I'll then be finalising Interwaste's annual regional compliance report based on the following consent conditions.

Condition no.	Condition summary	Comment/action required
6	No discharges to air which are noxious/dangerous/offensive/objectionable at or beyond the legal boundary of the property, in the opinion of a GWRC enforcement officer.	
7	All emissions control equipment to be well-maintained and operating correctly in a fully functional state at all times.	
10	Maintain a record of volume and nature of material processed by the waste sterilisation units, with this record included in the annual report.	
14	Employ an appropriately qualified person to undertake a comprehensive assessment of the performance of the biofilter on an annual basis. Provide the results of the assessment, including any recommendations and a timetable for actions to be taken, to GWRC with the annual report.	
15	Record the results of specific parameters for the biofilter on a continuous/weekly/quarterly basis	

	(differential pressure, pressure, visual observations, media moisture content, pH levels).	
16	The plant door to not remain open for longer than ten minutes at any one time. GWRC to be notified if the doors are required to be opened for a period exceeding ten minutes during plant operation.	
18	Annual report submitted to GWRC by 1 August each year, including the relevant monitoring results and data required under other consent conditions.	

Kind regards, Emily



Emily McDowall

Resource Advisor Kaitohutohu – Environmental Regulation

Greater Wellington Te Pane Matua Taiao

021 191 9689

100 Cuba Street, Wellington

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29th July 2022

Environmental Regulation
Greater Wellington Regional Council
P O Box 11646
WELLINGTON 6142

Re: WGN110357 Discharge to Air Consent

To whom it may concern

International Waste Ltd, trading as Interwaste is pleased to report on the preceding years operation of our site at 12 Broken Hill Road in Porirua.








The site has been fully operational as of 22nd February 2012.

Plant Volumes: (10)

After the impact of COVID-19, the quantities of quarantine waste have reduced dramatically for the second year in a row. Due to a significant increase in medical waste supply and disposal, we reverted to our standard working hours from 10 to 16 hours per day. Earlier this year, international flights resumed out of Wellington Airport, and we are expecting cruise ships to start visiting the region again this coming season. As a result, we are predicting an increase in quarantine waste and as medical waste levels remain high due to the pandemic, we expect to reach pre covid levels in 2024.

Years January to December.

2019 1,691,399 kg
2020: 1,615,588 kg
2021: 1,359,658 kg

<i>Medical</i>	
<i>Airport</i>	
<i>Port</i>	
<i>Confidential/paper</i>	
<i>Product disposal</i>	
<i>General</i>	
<i>Lamps</i>	
Total	1,359,658 Kg

Bio-filter (14,15)

Our Bio Filter system is working at an optimal level and makes a noticeable difference in keeping our generated odour under control. The most recent biofilter inspection, conducted on the 6th of July 2022 by Pattle Delamore Partners Ltd, shows that the biofilter is fit for purpose and in good repair. PH and media moisture were recorded as being within the recommended ranges.

PH testing has been carried out quarterly and have returned good results each time. Over time the PH level does change, and lime was added in February 2022 as a result. This data is recorded on our Complaints register, biofilter PH test and airflow results spreadsheet.

Visual inspections have been carried out weekly.

We run a sprinkler system on a timer to maintain moisture of the media.

Door operation (16)

All of our staff are trained that the entry and exit doors are not to be left open for any extended periods of time following entrance or exiting of the plant.

This topic is still raised at toolbox meetings on a regular basis. As a result of complaints made late 2021 and early 2022, staff have been seen making a great effort to maintain this requirement and I am pleased that the site has remained compliant.

Complaints (19)

Interwaste Wellington has received 4 odour complaints since the last report was issued. These were made by an anonymous source, and we were notified of these by GWRC and on one occasion, the immediate next door neighbours. An effort on our part has been made to ensure we continue to maintain our consent conditions are met and to minimise any disruption to the community.

This was followed up by a site visit from the GWRC and PCC. documentation was provided on request. Interwaste staff were informed of the complaints and instructed to follow consent conditions.

Record of odour complaints are kept on our Complaints register, biofilter PH test and airflow results spreadsheet.

Please feel free to contact me at any time if you require any additional information.

Sincerely

BLAIR CHALMERS
CENTRAL REGIONAL MANAGER



International Waste Ltd

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www.interwaste.co.nz

TOITŪ



International Waste Limited

P.O. Box 53 099, Auckland International Airport, Auckland, New Zealand.

Phone 64-9-256 8534 Fax 64-9-275 2380

DAILY COUNTER LOG

Date	No of Loads	Hours lost Downtime	Hours lost no waste	Grinder Hours	Cubic Meters Waste Water	BioFilter weekly Check / Pressure Record	Gas Units
1st	5922			3631	22989	75	517845
2nd							
3rd							
4th	5933			3634	22994	75	518021
5th	5943			3636	22998	70	518183
6th	5954			3637	23003	70	518358
7th	5966			3638	23008	70	518538
8th	5977				23013	75	518712
9th							
10th							
11th	5989				23018	75	518906
12th	6001				23021	75	519089
13th	6013				23026	75	519273
14th	6023				23030	75	519430
15th	6035				23035	75	519610
16th							
17th							
18th	6046				23040	75	519791
19th	6057				23044	75	519955
20th	6069				23048	75	520133
21st	6079 6079				23051	75	520300
22nd	6086				23052		520400
23rd							
24th	6091				23056	75	520495
25th	6102				23060	65	520672
26th	6115				23064	65	520862
27th	6127	boiler not working		-	23067	75	521034
28th	6134	↓			23070	75	521148
29th	6142				23074	60	521291
30th	6148	SEAL FIXED			23076		521378
31st							

Notes:

Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Tuesday, 27 September 2022 11:54 am
To: Emily McDowall
Subject: RE: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22
Attachments: 9 09 22.pdf

Good morning Emily

Apologies, I have been out of the branch traveling for a couple of weeks but back in the office now.

Attached are the minutes from the tool box meeting. The minutes do not stress how serious the conversation was and how clear the message is to the staff around the consent condition.

The staff member who was the cause of this breach has been through an investigation and further meetings internally.

Cheers

BLAIR CHALMERS
CENTRAL REGIONAL MANAGER



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An advertisement for Inhalo Medical oxygen. On the left, the word "INHALO" is written in large, blue, sans-serif capital letters, with "Medical oxygen" in a smaller, blue, sans-serif font below it. To the right of the text is a photograph of several white medical oxygen cylinders. On the far right, a dark blue rectangular box contains the text "We now supply medical gas and liquid nitrogen, contact us for a competitive quote." in white, sans-serif font.

TOITŪ



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Thursday, 22 September 2022 4:56 pm
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: RE: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22

Hi Blair,

How did that meeting go, could you send through a copy of those minutes please?

Kind regards,
Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Thursday, 8 September 2022 4:01 pm
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Subject: RE: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22



I will keep you posted with the progress of the door repairs and I will also send through the meeting minutes from our tool box tomorrow.

Regards
Blair

From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Thursday, 8 September 2022 3:55 pm
To: Blair Chalmers <blair@interwaste.co.nz>
Cc: [REDACTED]
Subject: RE: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22

Hi Blair,

Thanks, it is good to get back into things again [REDACTED]

That's no good about the door being open for an hour, yes important for all staff to be aware of the consent conditions and the reason behind them.
Please continue keeping us updated about that western roller door.

Kind regards,
Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Thursday, 8 September 2022 12:03 pm
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Cc: [REDACTED]
Subject: RE: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22

Good morning, Emily, nice to hear from you again and welcome back 😊

Thank you for sending the compliance report for 2022.
Regarding the western door, we have made some good progress on this over the last couple of weeks after months of delays with getting contractors on board to get the work done. We recently had a structural engineer on site to assess and report on the required materials so we could order these from [REDACTED].
It will only be a matter of weeks now until we get the required beams installed and cladding repaired so we can have the door fully operational again.

Regarding Tuesday's breach, indeed the door was left open. My footage shows it was left open from 10:30 until 11:30 (60 minutes).
This staff member has been spoken to and an internal investigation into this has been launched.

I will be discussing adding the consent condition of the roller door operation to our induction / personal training plans with our Safety, Health and Environmental Manager. This will ensure that any new staff members will be made aware of the consent condition.

This week's incident will also be raised at this weeks tool box meeting tomorrow.

Kind regards

BLAIR CHALMERS
CENTRAL REGIONAL MANAGER



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The advertisement features the "INHALO" logo in large blue letters with a registered trademark symbol. Below it, the words "Medical oxygen" are written in a smaller blue font. To the right, there is a photograph of several white medical gas cylinders with various regulators and hoses attached. On the far right, a dark blue rectangular box contains the text "We now supply medical gas and liquid nitrogen, contact us for a competitive quote." in white.

TOITŪ



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Thursday, 8 September 2022 10:08 am
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: WGN110357 - Low-risk non compliance rating for Interwaste 2021-22

Morning Blair,

I hope you are having a nice week.

Emily here [REDACTED] has headed off [REDACTED]
[REDACTED]

I've finished off your compliance report, please find it attached. Here are the main actions.

Please keep us updated on the scheduled repair to the western roller door.

Ensure that the operational roller door is meeting the 10-minute restriction, by reminding staff of compliance responsibilities and educating new staff on the need to close the door promptly.

If an allegation is made that the door has been open for longer than 10mins, please review CCTV footage and record in your complaints register the length of time it was open.

Please let me know how long the roller door was in fact open on Tuesday?

Kind regards,
Emily



Emily McDowall
 Resource Advisor Kaitohutohu – Environmental Regulation
 Greater Wellington Te Pane Matua Taiao
 021 191 9689
 100 Cuba Street, Wellington
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Please note that my usual days of work are Wednesdays, Thursdays and Fridays.

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Tuesday, 6 September 2022 12:37 pm
To: [REDACTED]
Cc: Notifications <Notifications@gw.govt.nz>
Subject: RE: WGN110357 air discharge compliance assessment
Importance: High

Good afternoon, [REDACTED]

I must apologise, I never replied to this email. I was about to send you an email today about a complaint that I have just received, and that is when I noticed that I had not replied.

To answer your questions below, we track the waste coming on site every day. Each month, this is compiled into a report. Below is the waste materials up until August.

Volume Recieved - KG`s	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

The air flow and PH is recorded on the spreadsheet that I submitted, the weekly inspection is signed off by staff on the attached PDT daily log. This is the sheet for July 2022.

These reports and sheets have been shown to the previous environmental inspectors and have not been required for previous annual reports.

I will ensure, going forward, these items are included in the annual report to GWRC.

On another note. I have received a text message from the occupants of unit 1/ 10 Broken Hill Road. A text message was sent to me at 11:22am claiming the door had been left open for an extended period. I have since checked our CCTV and confirm that the door was left open for more than the consented required time frame. I have spoken directly with the staff member concerned.

The complainant will also be making a complaint to the council.

I will be adding this to our complaint register.

Regards

BLAIR CHALMERS
 CENTRAL REGIONAL MANAGER



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From: [REDACTED] <[\[REDACTED\]@gw.govt.nz](mailto:[REDACTED]@gw.govt.nz)>
Sent: Thursday, 11 August 2022 10:25 am
To: Blair Chalmers <blair@interwaste.co.nz>
Cc: Health and Safety Team <hs@interwaste.co.nz>
Subject: RE: WGN110357 air discharge compliance assessment

Hi Blair,

I am currently assessing compliance against your consent (WGN110357) for the 2021/2022 period. I just have a couple of questions about some aspects of the reports you submitted.

Condition 10 requires you to keep and maintain a record of the volume and nature of the material processed by the waste sterilisation units. The data you submitted only goes up until December 2021 – do you have any data for this year?

Condition 15 requires that you measure and record a number of parameters, including:

- Differential pressure for the biofilter (continuous);
- Pressure across the biofilter bed (weekly);
- Visual inspections of the biofilter condition (weekly);
- Media moisture content (quarterly); and
- pH (quarterly).

The spreadsheet you attached has the pH and airflow but I can't see on any of the attachments that you have done the other aspects. Am I missing something?

If you could please get back to me asap that would be great. I am aiming to have your compliance report out to you by the end of the month (at the very latest).

Thanks



██████████
Kaitohutohu / Resource Advisor, Environmental Regulation
Greater Wellington Regional Council
Te Pane Matua Taiao

██████████
100 Cuba Street, Te Aro, Wellington 6011
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From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Friday, 29 July 2022 6:31 pm
To: ██████████ <██████████@gw.govt.nz>; Notifications <Notifications@gw.govt.nz>
Cc: Health and Safety Team <hs@interwaste.co.nz>
Subject: WGN110357 air discharge compliance assessment

Good afternoon, ██████████ and GWRC environmental team.

I am pleased to be able to pride you with the attached annual compliance report for our discharge to air consent WGN110357 at 12 Broken Hill Road, Porirua .

I have also attached the biofilter assessments for 2021 and 2022 along with our complaints register, biofilter PH testing and airflow results spreadsheet.

Since your last visit to our site ██████████ we have not received direct complaints in relation to odour specifically. Any complaints notified to us by GWRC will be included in the attached spreadsheet.

Our western roller door is still un-operational as we wait for engineers and contractors to repair the surrounding cladding and structure beam.

Kind regards

BLAIR CHALMERS
CENTRAL REGIONAL MANAGER



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From: [REDACTED]@gw.govt.nz>
Sent: Friday, 8 July 2022 10:34 am
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: RE: WGN110357 air discharge compliance assessment

Hi again Blair,

Sorry for the double email.

I see that Emily asked you to send through the results of the annual biofilter assessment that PDP was carrying out for the previous compliance period before the end of September last year. I cannot see this on file anywhere – was this assessment ever submitted to us?

Thanks

From: [REDACTED]
Sent: Friday, 8 July 2022 10:16 am
To: blair@interwaste.co.nz
Subject: WGN110357 air discharge compliance assessment

Good morning

I hope you are well.

I am currently doing the compliance assessment for Interwaste's air discharge consent WGN110357.

Just a reminder than the annual report for this consent is due to be submitted by the 1st of August 2022. This report needs to contain the monitoring results, data and other information required by conditions 10, 14, 15, 17 and 19.

I am also after a quick update on the broken door – have you made any progress in getting this fixed? I remember you may have scheduled this in when we visited the site a few months ago?

In relation to complaints, I am aware that GWRC have received a few this compliance year. Condition 19 requires you to notify GWRC of any complaints that you receive immediately or the next working day. Have you received any complaints directly? If so please send a record through.

Any questions please let me know

Thanks



[REDACTED]
Kaitohutohu / Resource Advisor, Environmental Regulation
Greater Wellington Regional Council
Te Pane Matua Taiao
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Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Wednesday, 12 August 2020 9:55 am
To: Emily McDowall
Cc: [REDACTED]
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Thanks Emily

Yes all systems are go this morning.

Just get in touch when you have some time and we can book it in.

Keep safe

Regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



International Waste Ltd

M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695
www.interwaste.co.nz



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Wednesday, 12 August 2020 9:52 AM
To: Blair Chalmers <blair@interwaste.co.nz>
Cc: [REDACTED]
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Hello Blair,

And back to level 2 we go! Oh dear, hopefully the outbreak is brought under control soon.

Thanks for this additional information and the attached table and images, this all looks and sounds good.

I'd definitely be keen to come out and have a look. The next couple of weeks and September are pretty busy for me, but I'll make a note in my diary to get back in touch with you at the start of October to see how you're placed. Thanks!

Have a good day, Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Monday, 10 August 2020 4:09 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>

Cc: [REDACTED]

Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Good afternoon Emily

Yes the bio filter fan is turned on during hours of operation and would only be turned off if work is being done on the bio filter itself.

As the PH level drops over time, I have lime here on site that can be added when required. Going off our recent results I would suggest lime will be added towards the end of the year. I make not of this on the PH testing tab on the spread sheet.

I will update the complaints register this week with a full update. We were just finalising things last week and I will have a quick chat with the guys next door on Wednesday. We really do get on well with them so when things like this happen it upsets me as much as them!

I will create a table on the spreadsheet for the checking. If you see the attached, this shows the daily checking of the bio filter by our staff. They record the flow and do a visual check (pulling out weeds if they see them). I have also attached a couple of photos of the flow rate meter, this tubing will be replaced very soon due to staining and general maintenance.

If you can find the time I welcome showing you our facility, it is quite unique and interesting but not for the faint hearted 😊

Cheers

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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www.interwaste.co.nz



From: Emily McDowall <Emily.McDowall@gw.govt.nz>

Sent: Thursday, 6 August 2020 3:59 PM

To: Blair Chalmers <blair@interwaste.co.nz>

Cc: [REDACTED]

Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Fantastic, thank you very much for sending this through Blair.

Good to read that the biofilter is still functioning well. Please could you let me know:

- Is the fan always turned on during operating hours (p.9 – I presume so but just double checking).
- Will lime continue to be regularly added, with an extra amount added near the biofilter inlet (p.11)?

You may wish to update the complaints register with the actions you decided on after talking to Vape Canyon (as I think you decided against applying a spray to the fence).

For your 2021 annual report, if you could please include a table of some description showing that you have visually checked the condition of the biofilter each week, and that you've checked the pressure readings. (It doesn't need to be long, just include a column for ticks, week 1-52, date completed, and any notes e.g. removed a few weeds today, gauge recorded pressure as such and such).

Kind regards, Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Monday, 3 August 2020 4:16 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Cc: [REDACTED]
Subject: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Good afternoon Emily

Please find attached our annual biofilter assessment for 2020, our complaints register and biofilter testing along with my written report for the year.

Please let me know if you have any suggestions to add to these reports or if there are any changes you wish to see.

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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Emily McDowall

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Friday, 31 July 2020 4:41 pm
To: Emily McDowall
Subject: Fwd: 2020 biofilter report
Attachments: W02333800R001 Final.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon Emily

I have just had our annual boifilter report come through this afternoon

A good result but I will have to send my full report in on Monday if that is ok?

Cheers

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER
International Waste Ltd
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www.interwaste.co.nz

From: [REDACTED]@pdp.co.nz
Sent: Friday, July 31, 2020 3:51:39 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: 2020 biofilter report

Hi Blair
Please find attached our report for the biofilter assessment.
Any questions please let me know.
Thanks and regards
[REDACTED]

[REDACTED] | Air Quality Service Leader
PATTLE DELAMORE PARTNERS LTD
Level 4, 111 Customhouse Quay, Wellington 6011
PO Box 6136, Wellington 6141
NEW ZEALAND

[REDACTED]
Map - [Wellington Office](#) | Web - [www.pdp.co.nz](#)

Emily McDowall

From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Thursday, 30 July 2020 1:31 pm
To: Blair Chalmers
Subject: RE: Odour complaint follow up

Thanks Blair for keeping me up-to-date, sounds like the guys at Vape Canyon appreciated the chat and the new plan going forwards.

Makes sense that there is no point in clearing the sump at different time of day when the neighbours also live on site.

I would personally still be wary of the air freshener, I don't think there's much backing up the eco-friendly claim apart from it being perhaps less harmful than alternatives containing VOCs and propellants. However, that is outside of my job and I will leave that to you and Vape Canyon.

Looks like I'm expecting your 2020 annual report shortly? (I received your 2019 report and biofilter assessment but think this year's report is still forthcoming).

Kind regards,
Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Thursday, 30 July 2020 10:52 AM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>; [REDACTED]
Cc: [REDACTED]
Subject: Odour complaint follow up

Good morning all

I went to speak with Kris (Vape Canyon) yesterday to discuss my plan going forward.

We first spoke about the installation of the Oxygen-Pro air fresheners, Kris was quite happy for this to go ahead and as per the attached, shows this is an environmentally friendly air freshener that can be used in food prep areas. [REDACTED], can you please go ahead and install a new air freshener at your earliest convenience.

Secondly we discussed the attached form of intent to clean out trade waste sumps. I explained that it was a requirement to have these annually cleaned and we were looking to increase this to twice annually. Kris's comment was "all we want is to know when it is going to happen". He was pleased with the new process.

Thirdly I spoke about the intent to spray deodoriser on the fence line. We have tried this and it is ineffective. The deodoriser evaporates within about half an hour and is not going to be viable going forward. The idea of a vine floral setup on the adjoining fence was raised by our SHE Manager, I will be looking into this a bit further.

Lastly I explained that I was hoping to meet with them monthly over the next quarter to see how things are going. We agreed on a casual walk in by me would suffice.

Over all I found Kris to be very happy with the follow up and keen to move on from this. With these steps in place I believe we will avoid the trade waste cleaning being a concern.

P.S. I had a visit from the Porirua City Council yesterday for trade waste inspection / annual visit for consent renewal, they were very pleased with how we were operating. I informed them of the odour complaint due to trade waste cleaning.

Cheers

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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www.interwaste.co.nz



Emily McDowall

From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Tuesday, 30 June 2020 4:40 pm
To: Blair Chalmers
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Oh great, thank you Blair, I've saved this to file. Good to read that the biofilter is fit-for-purpose. Aha, I see what you mean about condition 13. In that case there are just a few minor exceedances of that rate.

It does sound busy! Will look forward to hearing from you when you send in the annual report.

Kind regards, Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Tuesday, 30 June 2020 4:04 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Thanks Emily

My apologies, I attached the wrong biofilter assessment. The attached is for last year.

Our flow rate should be around 50 but we have the availability to adjust when necessary. We had some issues a several years ago where flow rates were up around 100 m³ / m³ and these were determined to be too high and our consent requires 50.

Our site processes all medical and quarantine waste in the lower north island so we must operate in these hours to ensure we get through all the waste while keeping within regulations for operating an MPI approved transitional facility and the standard for healthcare waste, it keeps us busy 😊

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



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www.interwaste.co.nz



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Monday, 29 June 2020 6:00 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Brilliant, thank you very much for sending this through Blair.

Good to see that you have been proactive in following up on complaints and that you have a solid relationship with staff at neighbouring premises. Thanks for the quarterly pH testing results, looks fine. What air flow readings are you aiming for with the biofilters? I looked back at the officer's report and original application but couldn't see what range is ideal. Gosh the hours at the business are long aren't they – up to 16 hours per day!

Thanks for arranging for the 2019-20 annual report to be completed. The biofilter assessment which you'd attached is for the year 2017-18, but if PDP could prepare another one (for 2019-20) to include with the annual report that would be much appreciated.

Ngā mihi, Emily

From: Blair Chalmers <blair@interwaste.co.nz>
Sent: Monday, 29 June 2020 4:37 PM
To: Emily McDowall <Emily.McDowall@gw.govt.nz>; Notifications <Notifications@gw.govt.nz>
Subject: RE: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Good afternoon Emily

Thank you for your follow up and time allowance to get last years report to you.

I have attached out 2019 biofilter assessment, our complaints register that also contains PH testing and airflow results and a report for the year 2019.
This years report will indeed be quite different with the issues our nation has been dealing with in recent months.

I have made contact with Pattle Delamore Partners Limited who will be performing our annual biofilter inspection in July. I do not anticipate any delays in getting our 2020 report to you on time.

Kind regards

BLAIR CHALMERS
WELLINGTON BRANCH MANAGER



International Waste Ltd

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www.interwaste.co.nz



From: Emily McDowall <Emily.McDowall@gw.govt.nz>
Sent: Wednesday, 17 June 2020 5:00 PM
To: Blair Chalmers <blair@interwaste.co.nz>; Notifications <Notifications@gw.govt.nz>
Subject: Annual compliance for Interwaste Porirua - WGN110357 [34191]

Kia ora Blair,

I hope you're having a good week, [REDACTED] ? I'm your new compliance officer and if you can also please email notifications@gw.govt.nz going forwards as [REDACTED] receive these emails and direct them to the correct people.

Your email is timely as I have been doing the annual compliance monitoring for my air discharge sites this month.

Yes, we are expecting your annual report. If you could please provide the report for the 2019-2020 year by **1 August this year**, as per condition 18. If you could provide the report for 2018-2019 (at least the information that it is still possible to compile, so not the annual biofilter monitoring for instance) by **15 July** (one month's time) – do you agree that this gives you enough time to compile this information, whilst also recognising that the report is outstanding? [REDACTED] has since left GWRC [REDACTED] which is why we hadn't picked up on this.

I've pasted the relevant conditions below, hopefully this is helpful.

Thanks for getting in touch and let me know if this sounds good about the dates for submitting those two annual reports.

Kind regards,
Emily



Emily McDowall
Resource Advisor – Environmental Regulation
Greater Wellington Te Pane Matua Taiao
DDI 04 830 4074 : M 021 191 9689
Shed 39, Fryatt Quay, Wellington
Follow us online: [Facebook](#) | [Twitter](#) | gw.govt.nz

18. The consent holder shall prepare and submit an annual report to the Manager, Environmental Regulation, Wellington Regional Council by 1 August each year. The report shall contain the relevant monitoring results, data and other information as required by conditions 10, 14, 15, 17 and 19 of this consent.
The report shall meet the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.
Note: The annual report shall report on the year 1 July to 30 June inclusive.
10. The consent holder shall keep and maintain a record of the volume and nature of the material processed by the waste sterilisation units. This record shall be presented to any Wellington Regional Council officer on request, and a copy shall be included in the annual report required by condition 18 of this consent. All recording methods shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.
14. **Annual biofilter monitoring:** The consent holder shall employ an appropriately qualified person to undertake a comprehensive assessment of the performance of the biofilter on an annual basis (or more frequently if deemed appropriate by the consent holder). The assessment shall involve an evaluation of the media size distribution and composition and effectiveness in removing contaminants.
The results of this assessment, including a summary of the findings, details of any action(s) to be taken to improve the efficiency and function of the biofilter, and a timetable for those actions to be undertaken, shall be submitted to the Manager, Environmental Regulation, Wellington Regional Council in the annual report required by condition 18 of this consent.

Actions to be assessed include, but are not limited to:

- Turning, restructuring and dampening of bed material
- The addition of supplementary bed material
- Partial bed material replacement
- Total bed material replacement; and
- The necessity for the provision of additional bed material (increase in overall biofilter volume)

15. **Scheduled biofilter monitoring:** The consent holder shall **measure and record the following parameters:**

- Continuous display of differential pressure for the biofilter
- Weekly recording of pressure across the biofilter bed
- Weekly general visual observations of the biofilter condition, including weed growth, compaction, and short circuiting
- Quarterly media moisture content in the upper two thirds layer for the first two years of operation and then six-monthly thereafter
- Quarterly monitoring of the pH of the biofilter bed media in the upper two thirds layer for the first two years of operation and then six-monthly thereafter

All monitoring results shall be recorded and analysed and be made available to an officer of Wellington Regional Council on request and included in the annual report required by condition 18 of this consent.

17. If the Manager, Environmental Regulation, Wellington Regional Council requests the consent holder to install an alarm on the door(s) in accordance with condition 16 of this consent the consent holder shall keep and maintain a record of the door(s) alarm.

This record shall include details of the date and time each time the alarm is activated, and the reasons why the alarm activated. The record shall also detail any maintenance periods during which the door(s) may remain open beyond the time period specified in condition 16 of this consent.

A copy of this record shall be included in the annual report required by condition 18 of this consent.

^ Looking at your file, I don't think we've asked for an alarm to be installed, but please let me know otherwise.

19. The consent holder shall keep a record of complaints received alleging adverse effects from the consent holder's operations. The complaints record shall contain the following where practicable:

- The name and address of the complainant, if supplied
- Identification of the nature of the complaint
- Date and time of the complaint
- Weather conditions at the time of the complaint
- Results of the consent holder's investigations, and
- Any mitigation measures adopted

The consent holder will ensure that each complaint it receives is responded to.

The consent holder shall notify the Manager, Environmental Regulation, Wellington Regional Council of any complaints relating to the exercise of this consent immediately or the next working day.

Notification can be sent to the Wellington Regional Council at notifications@gw.govt.nz. Please include the consent reference (WGN100357) and the name and phone number of a contact person responsible for the discharge.

The consent holder shall forward to the Manager, Environmental Regulation, Wellington Regional Council a copy complaints recorded, in the annual report required by condition 18 of this consent.

^ This is also most likely not relevant as we have no records of complaints on file.

From: Notifications <Notifications@gw.govt.nz>

Sent: Wednesday, 17 June 2020 3:37 PM

To: Emily McDowall <Emily.McDowall@gw.govt.nz>

Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019 [#2DFD7B]

Hi Emily,

I see you've taken over compliance of this consent from [REDACTED]
I've saved this compliance update to ourspace.
Could you get in touch with Blair to discuss these annual updates?

Thanks,

[REDACTED] | Kaiāpiha Taiao / Resource Advisor, Environmental Regulation
GREATER WELLINGTON REGIONAL COUNCIL
Te Pane Matua Taiao
Shed 39, 2 Fryatt Quay, Pipitea, Wellington | PO Box 11646, Manners St, Wellington 6142
[REDACTED] | www.gw.govt.nz |



From: GWRC <INFO@GW.GOV.T.NZ>
Sent: Monday, 15 June 2020 5:29 PM
To: Notifications <Notifications@gw.govt.nz>
Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019 [#2DFD7B]

Hi Consents team,

Are you able to follow up the customer's query please?

Thank you.

GW Contact Centre

-----Original Message-----

From: blair@interwaste.co.nz
Sent: Monday, 15 June 2020 4:09:24 PM
To: info@gw.govt.nz
Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Good afternoon

I have tried to email the Environmental Protection team but received a bound back as seen below:

This message was created automatically by the mail system (eclerity).

A message that you sent could not be delivered to one or more of its recipients. This is a permanent error. The following address(es) failed:

>>> enviromental.protection@gw.govt.nz (after RCPT TO): 550 5.4.1

>>> Recipient address rejected: Access denied. AS(201806281)

>>> [SG2APC01FT015.eop-APC01.prod.protection.outlook.com]

My original email below, I am looking for a current contact in the Environmental Protect / Recourse Consent team please.

Cheers

Blair Chalmers

Wellington Branch Manager



International Waste Ltd

M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695

www.interwaste.co.nz



From: Blair Chalmers

Sent: Monday, 15 June 2020 4:01 PM

To: 'enviromental.protection@gw.govt.nz' <enviromental.protection@gw.govt.nz>

Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Good afternoon team

I just sent an email through to [REDACTED] but this has bounced back to me.

I am looking for a current Environmental Protection Officer to discuss annual resource consent updates

Kind regards

Blair Chalmers
Wellington Branch Manager



International Waste Ltd

M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695

www.interwaste.co.nz



From: Blair Chalmers
Sent: Monday, 15 June 2020 3:50 PM
To: [REDACTED] <[\[REDACTED\]@gw.govt.nz](mailto:[REDACTED]@gw.govt.nz)>
Subject: RE: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Good afternoon [REDACTED]

I have recently returned back to work [REDACTED]
[REDACTED]

Now that I am back I am checking all of our compliance documents and making sure we are all up to date but quickly found that our resource consent update was due August 2019!

Although there has been no changes in our process I still intend to send through a annual update letter that I will put together over the next day for you.

All of our checking and testing has been ongoing and compliant.

Please let me know if there is anything else you will need from me to get this back on tract.

Kind regards

Blair Chalmers
Wellington Branch Manager



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From: [REDACTED] <[\[REDACTED\]@gw.govt.nz](mailto:[REDACTED]@gw.govt.nz)>
Sent: Wednesday, 1 May 2019 4:29 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Hi Blair,

Please find attached a compliance monitoring assessment for resource consent WGN110357[34191]. Your consent has received a rating of complying for the 2018-2019 year.

If you have any questions about the monitoring of your consent or your compliance assessment please contact me on [REDACTED] or return email.

Kind regards,

[REDACTED]

[REDACTED] | Environmental Protection Officer
GREATER WELLINGTON REGIONAL COUNCIL
Te Pane Matua Taiao
Shed 39, 2 Fryatt Quay, Pipitea, Wellington 6011
[REDACTED] | www.gw.govt.nz

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Emily McDowall

From: Notifications <Notifications@gw.govt.nz>
Sent: Wednesday, 17 June 2020 3:37 pm
To: Emily McDowall
Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019 [#2DFD7B]

Follow Up Flag: Follow up
Flag Status: Completed

Hi Emily,

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[REDACTED] | Kaiāpiha Taiao / Resource Advisor, Environmental Regulation
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>>> [SG2APC01FT015.eop-APC01.prod.protection.outlook.com]

My original email below, I am looking for a current contact in the Environmental Protect / Recourse Consent team please.

Cheers

Blair Chalmers
Wellington Branch Manager



International Waste Ltd

M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695

www.interwaste.co.nz



From: Blair Chalmers
Sent: Monday, 15 June 2020 4:01 PM
To: 'enviromental.protection@gw.govt.nz' <enviromental.protection@gw.govt.nz>
Subject: FW: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Good afternoon team

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Kind regards

Blair Chalmers
Wellington Branch Manager



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www.interwaste.co.nz



From: Blair Chalmers
Sent: Monday, 15 June 2020 3:50 PM
To: [REDACTED]@gw.govt.nz>
Subject: RE: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Good afternoon [REDACTED]

I have recently returned back to work after [REDACTED]
[REDACTED]

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Kind regards

Blair Chalmers
Wellington Branch Manager



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www.interwaste.co.nz



From: [REDACTED] <[REDACTED]@gw.govt.nz>
Sent: Wednesday, 1 May 2019 4:29 PM
To: Blair Chalmers <blair@interwaste.co.nz>
Subject: Compliance monitoring assessment for WGN110357 [34191] - 2018/2019

Hi Blair,

Please find attached a compliance monitoring assessment for resource consent WGN110357[34191]. Your consent has received a rating of complying for the 2018-2019 year.

If you have any questions about the monitoring of your consent or your compliance assessment please contact me on [REDACTED] or return email.

Kind regards,

[REDACTED]

[REDACTED] | Environmental Protection Officer
GREATER WELLINGTON REGIONAL COUNCIL
Te Pane Matua Taiao
Shed 39, 2 Fryatt Quay, Pipitea, Wellington 6011
T: [REDACTED] | www.gw.govt.nz

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