

## FILE NOTE

DATE 8 February 2023

AUTHOR Emily McDowall

SUBJECT Manager Approval of Interwaste Operations Manual

FILE NUMBER WGN110357

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### Introduction

International Waste Limited (Interwaste) holds consent WGN110357 [34191] which allows it “to discharge contaminants to air (namely odour) arising from the operation of a waste sterilisation facility”. The facility is located at 12 Broken Hill Road, Kenepuru. Condition 11 reads as follows:

### Operation & Management Plan

11. The consent holder shall prepare and submit for approval to the Manager, Environmental Regulation, Wellington Regional Council an **Operation & Management Plan (OMP)** within three months of the commencement of this consent, or within another timeframe to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. The scope of the OMP shall include but not be limited to the following information:
- As-built details of the Waste Reception and Waste Sterilisation areas, including relevant details of the extraction system, with records of significant maintenance undertaken during the current year
  - As-built details of the biofilter, with records of operating parameters, inspections undertaken and significant maintenance undertaken during the current year
  - Procedures for storing, transferring and treating waste materials
  - Operation and management of the waste treatment processes
  - Methods for ensuring the biofilter monitoring and recording parameters required by conditions 13-15 of this consent are met
  - Maintenance procedures for ensuring the good, clean condition of all trucks, containers and bins
  - Maintenance procedures for ensuring the good, clean condition of the waste sterilisation units, which are in accordance with the manufacturer’s specifications
  - An air management plan incorporating the operation and maintenance of all emissions control equipment (including the associated ducting for this equipment)
  - Staff training on the process requirements, use of emissions control equipment, and emergency response
  - Identification of any contingency and precautionary measures to be put in place (e.g. for upset conditions, plant breakdowns, power outages etc)
  - Procedures for dealing with any spills of waste material
  - Maintenance procedures for ensuring the building doors are kept in good working order
  - Procedures for ensuring that the integrity of the building envelope is maintained to minimise the potential for fugitive emissions
  - Procedures for responding to any complaints received relating to the discharges to air from the site

The consent holder shall ensure that the OMP is consistent with the conditions of this consent, and shall be updated as required, with the latest copy made available to the Manager, Environmental Regulation, Wellington Regional Council.

Any amendments to the OMP shall meet the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

### **Approval Required**

Around the time of my site visit to Interwaste in March 2021 I checked on file but could not see a record of Interwaste's OMP. It seemed this document had never been sent to GWRC for approval. I requested the document and Blair Chalmers, then Site Manager, provided the site's Operations Manual. This document contained much, but not all, of the information required by condition 11. I saved this document to Our Space but did not formally seek to have it approved.

In October 2022 I emailed Mr Chalmers ([110357-7-117](#)) to request an amended version of the Operations Manual that could meet the purposes of condition 11. I set a due date of 1 November.

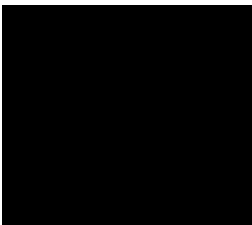
A process of review followed (for example: [110357-7-124](#)). I requested updates to the document to ensure that it was aligned to the original consent application, as I had noticed that some site practices detailed in the manual diverged from what was envisaged in the consent application.

The most up-to-date version of the OMP was provided to me on 1 February 2023 for Manager approval. The document can be found here: [110357-7-206](#)

I consider that the document now meets the requirements of condition 12. I do not see it necessary to seek technical advice before approval.

### **Recommendation**

That you approve Interwaste's Operation and Management Plan under condition 11 of consent WGN110357. Please sign here if you agree to this recommendation.



For: Manager, Environmental Regulation  
Team Leader  
Environmental Regulation

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**Subject:** FW: Notification received yesterday - please advise of waste processed

---

**From:** Valentin Czibesz <valentin@interwaste.co.nz>  
**Sent:** Tuesday, 17 January 2023 12:13 pm  
**To:** Emily McDowall <Emily.McDowall@gw.govt.nz>; Blair Chalmers <blair@interwaste.co.nz>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

The pickups are usually done around 12-1230PM and the bins are moved back inside in a few minutes depending on what the operators are doing when the bins are dropped off. I have asked the operators to have the pickups and drop offs done inside the plant starting from today so any odour coming out of them will pass through the biofilter.

REGARDS

VALENTIN CZIBESZ  
WELLINGTON OPERATIONS MANAGER



International Waste Ltd

M: +64 21 468 794 | D: +64 4 237 6982 | F: +64 4 237 4695  
[www.interwaste.co.nz](http://www.interwaste.co.nz)

An advertisement banner for INHALO Medical oxygen. On the left, the word "INHALO" is written in a large, blue, sans-serif font, with "Medical oxygen" in a smaller, blue font below it. To the right of the text is a photograph of several white medical gas 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, bold, sans-serif font.

TOITŪ



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Tuesday, 17 January 2023 11:49 am  
**To:** Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>; Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

Thanks Val. What time were the tips brought back and how long were they outside for? Cheers, Emily

---

**From:** Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>  
**Sent:** Monday, 16 January 2023 5:51 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>; Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

I had a good look at the waste coming in for the two days before and I couldn't find anything that would produce odour like the one described. We received 2646 kg of medical waste and 485 kg of quarantine on Wednesday, and 3255 kg of medical waste and 4425 kg of quarantine waste on Thursday. There were no animals of any kind for burial. The only thing I can think could smell is the empty skips brought back by the Envirowaste back from the tip. They do smell a bit just like the domestic wheelie bins at home. My intention is to get the pickups and drop offs done inside the building so the skips don't spend any time on the driveway before getting washed .

REGARDS

VALENTIN CZIBESZ  
WELLINGTON OPERATIONS MANAGER



International Waste Ltd

M: +64 21 468 794 | D: +64 4 237 6982 | F: +64 4 237 4695  
[www.interwaste.co.nz](http://www.interwaste.co.nz)

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TOITŪ



---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 13 January 2023 8:34 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>; Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** Notification received yesterday - please advise of waste processed

Hello Blair and Val,



Thanks Val for hosting me on-site this afternoon, much appreciated.

As mentioned, yesterday (12 January) at 11.34am we received a notification of odour emanating from Interwaste. The rostered duty officer attended and completed a 10 minute odour assessment beyond Interwaste's boundary. This was at 12:34pm.

The wind direction was southerly and ~34kph.

Given his ratings and descriptions of the smell, I need you to please provide records of all waste received, stored and processed on site yesterday.

Please pinpoint what was processed in the middle of the day as far as possible.

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.

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---

**Subject:**

FW: Notification received yesterday - please advise of waste processed

---

**From:** Emily McDowall**Sent:** Friday, 13 January 2023 8:34 pm**To:** Blair Chalmers <blair@interwaste.co.nz>; Valentin Czibesz <valentin@interwaste.co.nz>**Cc:** [REDACTED]**Subject:** Notification received yesterday - please advise of waste processed

Hello Blair and Val,

Thanks Val for hosting me on-site this afternoon, much appreciated.

As mentioned, yesterday (12 January) at 11.34am we received a notification of odour emanating from Interwaste.

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This was at 12:34pm.

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Kind regards,

Emily



**Emily McDowall**

Resource Advisor Kaitohutohu – Environmental Regulation

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Please note that my usual days of work are Wednesdays, Thursdays and Fridays.

---

**Subject:**

FW: Odour notification - Ozone Contact Centre No. 23415

---

**From:** Emily McDowall  
**Sent:** Wednesday, 30 November 2022 3:31 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>  
**Subject:** RE: Odour notification - Ozone Contact Centre No. 23415

Ah of course, ta

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Wednesday, 30 November 2022 3:26 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Cc:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>  
**Subject:** Re: Odour notification - Ozone Contact Centre No. 23415

Hi Emily

Blue bins are for Document destruction. These bins are empty, ready and waiting for our Napier driver to pickup. No odours are generated from these.

BLAIR CHALMERS  
CENTRAL REGIONAL MANAGER  
International Waste Ltd  
M: +64 21 727 138 | D: +64 4 237 6987 | F: +64 4 237 4695  
[www.interwaste.co.nz](http://www.interwaste.co.nz)

---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Wednesday, November 30, 2022 3:21:47 PM  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>  
**Subject:** RE: Odour notification - Ozone Contact Centre No. 23415

Thanks Blair, I will save your response and the photos to file.  
I presume the blue wheelie bins, if they contained waste, were outside for a minimal length of time.  
Kind regards, Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Wednesday, 30 November 2022 3:11 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Cc:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>  
**Subject:** RE: Odour notification - Ozone Contact Centre No. 23415

Good afternoon, Emily

I have been back on site since 12:30pm and have not noticed anything to be causing an offensive odour. The site has been relatively quiet most of the afternoon.  
Reviewing our camera footage, our tipper truck went to the landfill around 1pm (the door was open for 2 minutes as the truck left, and 2 minutes once the truck arrived back).

Searching 15 minutes either side of the complaint time of 2:01pm, we had one truck come back to site after making collections, there was no other movements.

I will include this to our complaints register.

Regards

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



International Waste Ltd  
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[www.interwaste.co.nz](http://www.interwaste.co.nz)

**INHALO**<sup>®</sup>  
Medical oxygen

We now supply medical gas and liquid nitrogen, contact us for a competitive quote.

The advertisement features a white medical oxygen cylinder on the left. The background is split into a light blue gradient on the left and a dark blue gradient on the right.

TOITŪ



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Wednesday, 30 November 2022 2:59 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** FW: Odour notification - Ozone Contact Centre No. 23415

Hello Blair,

Notification received this afternoon, please add this to your complaints register.  
Do you know what might have produced odour around 2pm this afternoon?

Thanks, Emily

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Wednesday, 30 November 2022 2:05 pm  
**To:** [REDACTED]  
**Subject:** Ozone Contact Centre # 23415 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23415 [ [View Transaction >> Click here to view your CC Transaction](#) ]  
Created: 30 Nov 2022 @ 02:01pm by [REDACTED]  
Type/Subtype: Env Protection Incident / Env Protection Incident all types  
Priority: 1 HOUR  
Action: EMAIL  
Your Position:

Message:

Transaction no. 23415, received 30 Nov 2022 at 02:01pm has been assigned to you. Please Schedule the action immediately.

Notifier:

Source Parcel:

TA: Wellington City Council

Details: The caller said that there is a toxic smell coming from Interwaste. The caller said that it is about a 6/6 atm and they're getting a lot of complaints from customers. 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: 12 Broken Hill Road

Porirua

5022

Phone: cel 0064 22 1692588

Temp phone: ; Ref:

Email:

This message was automatically generated by the Ozone Contact Centre

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

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**Subject:**

FW: Odour notification 6.12.22 No. 23451

---

**From:** Emily McDowall**Sent:** Wednesday, 7 December 2022 10:12 am**To:** Valentin Czibesz <valentin@interwaste.co.nz>; Blair Chalmers <blair@interwaste.co.nz>**Cc:** Nigel Priest <Nigel@interwaste.co.nz>**Subject:** Odour notification 6.12.22 No. 23451

Hi again Val, Blair,

This one is from yesterday, please could it be added to your complaints register.

Please let me know if flies have been observed on site indoors or out.

Thanks, Emily

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Tuesday, 6 December 2022 3:05 pm**To:** [REDACTED]**Subject:** Ozone Contact Centre # 23451 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23451 [ [View Transaction](#) >> [Click here to view your CC Transaction](#) ]

Created: 06 Dec 2022 @ 03:00pm by [REDACTED]

Type/Subtype: Env Protection Incident / Env Protection Incident all types

Priority: 1 HOUR

Action: EMAIL

Your Position:

Message:

Transaction no. 23451, received 06 Dec 2022 at 03:00pm has been assigned to you.

Please Schedule the action immediately.

Notifier:

Source Parcel:

TA: Porirua City Council

Details: call said the Interwaste site odour is 4/6 today, he walked uphill and said the smell is 6/6 heading to Spicer landfill. This smell has also attracted millions of flies around the surrounding area.

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**Subject:** FW: Odour notification 7.12.22 No. 23454

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**From:** Emily McDowall  
**Sent:** Wednesday, 7 December 2022 10:09 am  
**To:** Valentin Czibesz <valentin@interwaste.co.nz>  
**Cc:** Blair Chalmers <blair@interwaste.co.nz>; Nigel Priest <Nigel@interwaste.co.nz>  
**Subject:** Odour notification 7.12.22 No. 23454

Hello Val,  
Please could you check the roller door is closed and see if any activities on-site at present could be causing a particularly strong odour.  
Thank you, Emily

---

**From:** [REDACTED]  
**Sent:** Wednesday, 7 December 2022 9:57 am  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** FW: Ozone Contact Centre # 23454 [EMAIL] - Created by [REDACTED]

Sorry Emily, here is another one.



Ngā mihi,

[REDACTED]  
Kaitohutohu / Resource Advisor  
**Greater Wellington Te Pane Matua Taiao**  
100 Cuba Street, Te Aro, Wellington  
**Email:** [REDACTED]  
**Follow us online:** [Facebook](#) | [Twitter](#) | [gw.govt.nz](http://gw.govt.nz)

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**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Wednesday, 7 December 2022 9:49 am  
**To:** [REDACTED]  
**Subject:** Ozone Contact Centre # 23454 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23454 [ View Transaction >> [Click here to view your CC Transaction](#) ]  
Created: 07 Dec 2022 @ 09:38am by [REDACTED]  
Type/Subtype: Env Protection Incident / Env Protection Incident all types  
Priority: 1 HOUR  
Action: EMAIL  
Your Position:

Transaction no. 23454, received 07 Dec 2022 at 09:42am

Details: Caller rang to report an offensive odour coming from Interwaste, smelling of



processed medical waste. It was first smelt around 8am but wasn't too horrible, but now at around 9:30am it is absolutely horrendous and causing customers and staff in the callers shop to dry heave and frantically close the doors - although it just traps the smell inside. Rated 6/6.  
WF/30/0/0/0/AFTER/R/EMAIL/R/

---

**Subject:** FW: OIA request and questions based on videos

---

**From:** Emily McDowall  
**Sent:** Friday, 14 October 2022 11:57 am  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** RE: OIA request and questions based on videos

Hi Blair  
Yes, it's 021-191-9689. Free now  
Cheers, Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Friday, 14 October 2022 11:53 am  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** RE: OIA request and questions based on videos

Hi Emily  
Do you have a contact number I can get you on?  
Cheers  
Blair

---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, 13 October 2022 5:42 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** FW: OIA request and questions based on videos

Apologies, last email for now.  
A couple of those questions are arguably out of scope of GWRC's role. I have crossed them out (see below). However I would appreciate answers to the other questions as I consider they link to the consent conditions including condition 1, the activity being carried out in accordance with the consent application.  
Thank you, Emily

---

**From:** Emily McDowall  
**Sent:** Thursday, 13 October 2022 3:28 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** RE: OIA request and questions based on videos

Hi again Blair,

I have been thinking about the Ops Manual and occupational hygienist report.  
It may be that grounds do not exist to withhold these. I would appreciate Interwaste's perspective on the release of these two documents.

Below are the questions from the original request which we are responding to (having responded to other questions already).

- *All written and verbal communications regarding council meetings with Interwaste that occurred due to smell complaints received for the years 2019, 2020, 2021 and 2022.*

- *All written and verbal communication in regards to smell complaints received on the following dates for Interwaste:*

*Tuesday the 23<sup>rd</sup> of November 2021*

*Friday the 25<sup>th</sup> of February 2022*

*Sunday the 24<sup>th</sup> of April 2022*

*Monday the 25<sup>th</sup> of April 2022*

*Tuesday the 26<sup>th</sup> of April 2022*

*Wednesday the 27<sup>th</sup> of April 2022*

*Thursday the 28<sup>th</sup> of April 2022*

*Friday the 29<sup>th</sup> of April 2022*

*Monday the 5<sup>th</sup> September 2022*

*Tuesday the 6<sup>th</sup> of September 2022*

*Thursday the 8<sup>th</sup> of September 2022*

- *All records of smell complaints received for Interwaste.*
- *Details of any reports or investigations regarding health or environmental hazards at Interwaste from the date their resource consent was granted until the date this OIA was received.*
- *All written and verbal communication surrounding what the council has done to ensure Interwaste's compliance with their Resource Consent/s.*

Regards, Emily

---

**From:** Emily McDowall

**Sent:** Thursday, 13 October 2022 1:40 pm

**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>

**Subject:** OIA request and questions based on videos

Hello Blair,

I hope this email finds you well. Two matters to address please.

### **OIA request**

Your neighbours have sent us several OIA requests to which we are currently responding.

One of the requests covers compliance reports, your annual reports and air monitoring reports, and correspondence at council and between GWRC/Interwaste.

The presumption under the OIA is that all information should be made available unless there is good reason for withholding it. On that basis, almost all of the information (over 100 documents including emails) is to be released. We are, however, suggesting some minor redactions.

- We propose to withhold in full the plant's Operational Manual and the commissioned occupational hygienist report, on the basis that, whilst the information was provided to us in good faith, this is not GWRC's information – it is commercial property
- However, we propose to release the commissioned independent biofilter monitoring reports given the primacy of this information to the request and GWRC's work
- We propose to release the Interwaste meeting minutes but withhold Interwaste Kenepuru employee names on privacy grounds
- All correspondence between us will be released, including your contact details, however we will redact the mentions of your [REDACTED] on privacy grounds

Please let me know if you have any concerns, and if so, the relevant grounds of the Local Government Official Information and Meetings Act 1987.

[Local Government Official Information and Meetings Act 1987 No 174 \(as at 12 April 2022\), Public Act – New Zealand Legislation](#)

I would need to hear back from you by COP Tuesday 18<sup>th</sup> October to take any comments into consideration.

If you wish to see examples of the documents or the OIA wording let me know.

## Videos

As you may be aware, Chris Roestenburg has uploaded videos of the Interwaste site onto YouTube.

<https://www.youtube.com/watch?v=1T9z9c1cTf0>

We have watched these videos and I have some questions.

### Video 16.12.21

Why was the steam produced?

Why, knowing it odorous steam was being produced, was this skip placed by the property boundary?

### Video 06.01.22

What does this video show?

Is this a usual practice?

### Nighttime video - 02.05.22

~~Why was the gate left open?~~

First skip - has this waste been treated?

~~If so, is it appropriate for sharps bins to be treated through an autoclave? Does this allow the proper penetration of steam and application of pressure?~~

If not, is it appropriate for untreated sharps bins to be left uncovered outside the factory?

3x metal containers lined with plastic containing yellow bags - has this waste been treated?

Why was the waste in these containers left uncovered outside the building?

Thank you in advance for your response.

Kind regards,  
Emily



**Emily McDowall**

Resource Advisor Kaitohutohu – Environmental Regulation

**Greater Wellington Te Pane Matua Taiao**

100 Cuba Street, Wellington

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**Subject:** FW: Operations Manual - let's get it approved asap please - WGN110357  
**Attachments:** IWL Wellington Operations Manual 2023.docx

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**From:** Blair Chalmers <blair@interwaste.co.nz>  
**Sent:** Wednesday, 1 February 2023 2:35 pm  
**To:** Emily McDowall <Emily.McDowall@gw.govt.nz>; Valentin Czibesz <valentin@interwaste.co.nz>  
**Subject:** RE: Operations Manual - let's get it approved asap please - WGN110357

Hi Emily

Each update of this manual takes a bit of time, sorry for the delay. I always review it in full then this needs to be reviewed by our CEO and sometimes the Directors.

I have added just a couple of minor notes as explained below in green around animals in reefer containers and definition to long and short shutdown periods.

The process of appointing my replacement is well underway and hopefully by the time we meet on the 10<sup>th</sup> of Feb, we will have an update on who will be taking over the responsibility.

We are ordering a leased reefer container from Royal Wolf, as the capitol costs of buying one new are high and we might re-evaluate our processes / services being provided / bypassing our site if possible, for example.

Cheers

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



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[www.interwaste.co.nz](http://www.interwaste.co.nz)

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

TOITŪ



---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, 26 January 2023 1:23 pm

**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>; Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>  
**Subject:** Operations Manual - let's get it approved asap please - WGN110357

Hello Blair,

I was just thinking about this Ops Manual, let's get it approved before you head off.

It sounds like you made all the changes I had requested (see below), with the possible exception of:

- Segregation area: please ensure the document provides that animal carcasses are to be stored in a refrigerated container if on site (inside only) for more than 24 hours **Notes added: All wastes must remain inside, A refrigerator container is available if wastes cannot be processed within 24 hours.**
- Ignore my comment about the cooling down period because I think the machines cannot be opened until they have cooled down to some level (so no change needed)
- Please include the definitions of shutdown and long shutdown in the document if they don't appear already **Stated on page 37, short shutdown = 48 hours or less, long shutdown = 5-7 days.**
- Ignore my comment about the storage containers, I was imagining a different receptacle
- Also ignore my comment about cleaning the autoclave

Please could you email back the most recent version of the Ops Manual, with those two changes made above, and I will get it approved.

Thanks! 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](mailto:blair@interwaste.co.nz)>

**Sent:** Monday, 28 November 2022 5:38 pm

**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>

**Cc:** [REDACTED]

**Subject:** RE: Operations Manual and meeting next Wednesday - WGN110357

Good afternoon, Emily

I certainly can meet you at your office in Wellington 11am this Wednesday.  
Can we discuss the below comments then?

Cheers

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



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---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, 24 November 2022 4:57 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Operations Manual and meeting next Wednesday - WGN110357

Hello Blair,

Thanks for this round of updates to the Operations Manual. Nearly there!

There are a couple of matters, identified below (my text in red) where it seems practice may have diverged from the process specified in the application.

- Storage of animal carcasses on-site past 24 hours (whether in a refrigerated container or unrefrigerated inside the building)
- Autoclave cooling period for processed waste (whether or not this is necessary)

We have to follow the process in the application and associated documents, so please either highlight to me where we have received divergent information or follow the practices in the consent application. Alternatively you may need to apply for a s 127 consent variation for such changes to procedure.

For our meeting next Wednesday 30<sup>th</sup>, please advise if you could meet Jude and I at our Cuba Street office (by the bucket fountain), at 11am?

We can schedule a site visit for a later time.

Kind regards,  
Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Tuesday, 22 November 2022 4:13 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Operations Manual and meeting - WGN110357

Good afternoon Emily

I have made the majority of the suggested changes and made some comments below in green.

In relation to shutdowns etc, I have also attached a copy of our business continuity and emergency plan that goes into more specifics around natural disasters / pandemics etc.



I look forward to your feedback 😊

Regards

BLAIR CHALMERS  
CENTRAL REGIONAL MANAGER



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---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 28 October 2022 12:28 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** Changes needed for operations manual please - WGN110357

Kia ora Blair,

Thank you for making these updates and sending me back this document promptly.

I've had a look and there are some areas to adjust please.

The text at 26.1.1 and 26.1.3 looks good, and I think the nifty drawing in that section is new?

However, I'd like the same terminology to be copied over to earlier sections of the document. It is crucial that all staff are aware that waste should be stored indoors in the waste receipt area, *not* outside except where it is contained in a refrigerated container.

Please incorporate the concepts highlighted in the application document attached throughout the whole Ops Manual, and remove incorrect references / designations. This is in sections 4 and 5 of the application document.

Please update:

- P.31 – 11.2 [4] remove “segregation area” and specify this should be in a refrigerated container **This process has changed significantly since the application. At the time of application Interwaste was the sole disposer of large amounts of animal carcasses from a University in Palmerston North. This would result in approximately 30-40 bins per month. This is now no longer the case and Interwaste might only see 2-5 bins per week. It has been arranged that the animals that we get now, can be disposed of at landfill 2-3 times per week. Currently Tuesday and Thursday, discussions with Spicer Landfill around changing this to Monday, Wednesday and Friday. Around 7 years ago, the refer container stopped working and a decision was made back then (by our CEO) to not have it repaired as we no longer required it to store large amounts of animals. If council considers it to be necessary to store the animal waste in the outside refer container for a day or two then I will discuss this with our National Operations manager to have it repaired or replaced, however, I think keeping the bins over by the autoclave (as far from the roller doors as possible) is a better solution. I have reworded this section slightly but please let me know what you think.**

**As per 5.3.1 of the application document, medical waste (inc. animal carcasses) can be stored inside for no more than 24 hours. After this time it needs to be stored in the (repaired) refrigerated container. This is important given that these carcasses would be particularly odorous and the factory doors are opened multiple times per day. If you wish to change this requirement you would need to apply for a s 127 change of consent conditions. This application would need to cover odour effects.**

**Please update this section of the Operations Manual or advise that you will apply for a s 127 change of consent conditions.**

- P.35 [11.9] waste delivered in wheelie bins *must* be taken directly to the (waste receipt area in the) processing plant room **Changed**
- [11.10] medical and other non-quarantine waste *must be* taken directly... **Changed**
- [11.12] Please add the highlighted text in the application document where it mentions that the autoclave *must be allowed to cool down before waste is removed* **This statement from the application refers to**

rotoclaves. Rotoclaves are autoclaves that have a rotating cylinder inside. This is the setup that was at the previous Interwaste facility (Photos attached) and that was the original plan when moving premises to Porirua, however, prior to the Porirua facility becoming operational, the Directors decided to install autoclaves instead. Autoclaves are a much tidier and less odourous way of steam sterilising and these do not require cooling down.

I found the letter of 20 June 2011 which was accepted as additional information for the purposes of condition 1. However, there is nothing here to suggest that a cooling period is not necessary for these particular models of autoclaves.

Unless there is some evidence of this which we have been provided, you will need to institute a cooling down period or apply for a s 127 change of conditions.

- P.37 [12.1] sharps – define “a safe place” and clarify this is inside the processing plant. Further, I don’t think it is quite correct that they can be stored indefinitely, even if hypothetical, the intention in the application is that waste should be processed within 24hrs (medical) and 48hrs (quarantine). Our intention is to process waste as fast as practicable, but occasionally there have been periods of up to 5 working days where the machinery has been worked on for repairs. In the 12 years I have worked for Interwaste there has only been 2 instances where the site has been not operational for longer than 5 days and one of these occasions was when the autoclaves were being swapped out. Please also define “shutdown” (24-48 hours) and “long shutdown” (5-7 days) – what is meant by a shutdown exactly, e.g. could this be Christmas holidays or are we talking about some exceptional circumstance like if there is a major earthquake, pandemic lockdown etc. ? Interwaste is considered an essential service so during the latest pandemic, we operated through lockdowns etc. Also, we work through all holidays and at the most, we will shutdown the plant for Christmas and New Years Day only. We have a business continuity plan; this was put in place for exceptional circumstances like a natural disaster however a “shutdown” as per this operating manual specifically relates to maintenance or machinery failure.

Okay thanks. Please define these terms in the Operations Manual if you haven’t already so that it is clear for future compliance officers.

- P.38 Please clarify that “in a safe area” envisages that the bags are stored inside the processing plant. Or storage container (like the ones we store our cytotoxic waste in). I have reworded this slightly to reflect this note. Please identify in the application document where it is recorded that this medical waste can be stored outdoors in a storage container? I am skeptical about “odours cannot permeate through”. The 125 micron bags are very thick liners. Much thicker than medical waste bin liners. I will make sure I have one ready to show you on your next visit so you can see the difference.
- P.38 please update [3] and [4] to specify this is indoors, unless in the refrigerated container, and, as above, let me know more about what is meant by a shutdown. Are these shutdowns referenced or explained somewhere in the application document when consent was applied for? The refer container location is outside, I have reworded the Bagged Waste to refer inside storage. As above for shutdown definition and time frames. Thanks
- It would be handy to include some photographs, perhaps as an appendix, of the examples of the different bags, bins/skips and secure transport units. I think this is a very good idea and have added an appendix with pictures of these receptacles This is great, just the STUs and containers are missing
- P.50 please append to the Ops Manual an example checklist form for the daily biofilter check Agree and added Thanks (it’s come up grainy though?)
- 24.13 Why are cleandown procedures not applicable to this branch? These sections refer to the Sani-Pac sterilisation units located at our Auckland Facility. The Autoclave we have in Wellington is a much simpler design and requires far less maintenance. Is there some evidence of this you can provide please?
- P.57 – This cannot be 72 hours, it must be “all quarantine waste with the potential to cause odours shall be treated within 48 hours” – it can then be transferred to a refrigerated container (or taken to another Interwaste branch) if it has ‘the potential for odour evolution’ Agree and amended Thanks
- P.57 Please specify here that medical waste should generally be processed within 24 hours Added Thanks
- 26.13 – what are the roller doors inspected for? Operation (IE working), and that they are closed as per our monthly site inspections. Thanks
- P.68 – this is good. I’m assuming the animal container is one of the refrigerated ones? Yes but not currently operational as per my comments above. What is meant by ‘Daniels’ out of interest? The “Daniels” range of sharps containers is a reusable sharps container. These require decanting and cleaning before being reused.

We currently are not supplying and servicing these particular containers however, this may continue in the future. Thanks

- Section 28 on complaints – it is not just about odour-related complaints, please reference the text in the consent condition and also add our email address [The ops manual contains the notifications@gw.govt.nz email address](mailto:notifications@gw.govt.nz), what other email addresses would you like added? I must have missed the address, just that one is fine
- The diagram on p.86 – “1: plant receiving area” – should be indoors I have worded this to be more specific Thanks
- Please update the GWRC resource consent to the current version [34191] Done You may have missed this, I was meaning the version at Appendix XV?

And please let me know:

- P.33 – western roller door. Is this door still out of action? Will it be used again and what happened to the door exactly? In October 2021, one of our staff members reversed our forklift into the roller door causing sever damage. We have been working all year to get the repairs done but struggled to find contractors and suppliers to help with a job of this size. We have slowly been making progress, have engaged a structural engineer to allow us to order the structural beams required that have just arrived last week (16/11/2022). We are looking to have these installed early December and aiming to have the door fully operational again by the end of January / early February 2023. Thanks for the explanation and update
- Pp 25-26 of the application document: are bins washed and disinfected each time in the bin wash area? Please incorporate this requirement into the Ops Manual. Yes bins are only washed in the bin washing area. Thanks
- P.32 of the application: is deodorising spray used at present for ‘particularly odorous’ bins? Please add to the Ops Manual. Yes, we use A1 Pleasant plus deodorising spray. I have added this to page 28 of the Ops Manual. Thanks

Thanks for this, it will be good to get this approved by GWRC soon.

Ngā mihi, 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](mailto:blair@interwaste.co.nz)>

**Sent:** Tuesday, 25 October 2022 1:40 pm

**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>

**Subject:** FW: Request for OMP for GWRC approval - WGN110357

Good afternoon, Emily

I have updated this operating manual over the weekend and just had our upper management approve it.

Please accept this submission as our OMP for GWRC approval.

I have commented below in green which sections relate to the required information.

Please let me know if you have any feedback

Kind regards



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 21 October 2022 11:03 am  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** Request for OMP for GWRC approval - WGN110357

Kia ora Blair,

I hope you're having a good week.

I wanted to rectify something with your air discharge consent WGN110357.

The consent requires an Operations and Management Plan to be submitted to us for the Manager's approval. In 2020 I noticed that we have no record on file of this document having been approved. You sent me through the site's Ops Manual and I saved it to file but didn't arrange for the document to be approved.

We do need an approved OMP on file.

Please could you provide us an amended version of your Ops Manual that:

- Includes all the details below. The as-builts will be for the current version of the biofilter.
- Ideally doesn't include any extraneous material, as GWRC will likely provide the full OMP if requested (and the "OMP" has now been specifically requested) under OIA.

Given that most if not all of this material is already contained in the Ops Manual, I would like this material provided to me by no later than **COP Tuesday 1<sup>st</sup> November**.

At my end, I will review the document to make sure it includes the matters listed below, and to clarify anything if needed.

I will prepare a memo with a recommendation of approval/not to be signed by the Manager.

We may or may not receive technical advice on the document before approving it.

The OMP should be in accordance with the original consent application, attached (and the other associated docs provided in 2011 and the change of consent conditions material).

Kind regards,  
Emily

## Operation & Management Plan

11. The consent holder shall prepare and submit for approval to the Manager, Environmental Regulation, Wellington Regional Council an **Operation & Management Plan (OMP)** within three months of the commencement of this consent, or within another timeframe to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. The scope of the OMP shall include but not be limited to the following information:
- As-built details of the Waste Reception and Waste Sterilisation areas, including relevant details of the extraction system, with records of significant maintenance undertaken during the current year [Section 24.5 / page 50](#)
  - As-built details of the biofilter, with records of operating parameters, inspections undertaken and significant maintenance undertaken during the current year [Section 24.5 / page 50 \(& Appendix XIV\)](#)
  - Procedures for storing, transferring and treating waste materials [Section 11/ pages 30-37](#)
  - Operation and management of the waste treatment processes [Section 11/ pages 30-37](#)
  - Methods for ensuring the biofilter monitoring and recording parameters required by conditions 13-15 of this consent are met [Section 24.5 / Page 50](#)
  - Maintenance procedures for ensuring the good, clean condition of all trucks, containers and bins [Sections 8,9,10,15](#)
  - Maintenance procedures for ensuring the good, clean condition of the waste sterilisation units, which are in accordance with the manufacturer's specifications [Section 24](#)
  - An air management plan incorporating the operation and maintenance of all emissions control equipment (including the associated ducting for this equipment) [Section 26](#)
  - Staff training on the process requirements, use of emissions control equipment, and emergency response [Section 5](#)
  - Identification of any contingency and precautionary measures to be put in place (e.g. for upset conditions, plant breakdowns, power outages etc) [Section 29](#)
  - Procedures for dealing with any spills of waste material [Section 6](#)
  - Maintenance procedures for ensuring the building doors are kept in good working order [Section 26.1.3](#)
  - Procedures for ensuring that the integrity of the building envelope is maintained to minimise the potential for fugitive emissions [Section 26](#)
  - Procedures for responding to any complaints received relating to the discharges to air from the site [Section 28](#)

The consent holder shall ensure that the OMP is consistent with the conditions of this consent, and shall be updated as required, with the latest copy made available to the Manager, Environmental Regulation, Wellington Regional Council.

Any amendments to the OMP shall meet the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

12. The consent holder shall, at all times, operate, maintain, supervise and control all processes and equipment on site to ensure compliance with the approved OMP pursuant to condition 11 and all other conditions of this consent.



**Emily McDowall**  
Resource Advisor Kaitohutohu – Environmental Regulation  
**Greater Wellington Te Pane Matua Taiao**  
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---

**Subject:**

FW: Operations Manual and meeting - WGN110357

---

**From:** Emily McDowall

**Sent:** Friday, 11 November 2022 2:43 pm

**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>

**Cc:** [REDACTED]

**Subject:** RE: Operations Manual and meeting - WGN110357

Thanks Blair, I will look forward to receiving the updated manual later next week or early the following then.

Let's lock in the 10.30am on Wednesday 30 November then, we can come to you.

Kind regards, Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>

**Sent:** Friday, 11 November 2022 11:44 am

**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>

**Cc:** [REDACTED]

**Subject:** RE: Operations Manual and meeting - WGN110357

Good morning, Emily

I will need to update The Operations Manual next week; I have been dealing with our Christchurch site Transitional Facility Manual updates and will be in Christchurch on Monday and Thursday next week to meet with MPI.

I will be available on Wednesday the 30<sup>th</sup> of November, anytime between 10am and 4pm, all the other dates, I will either be out of town or have other engagements (it is a very busy time of year).

If that date doesn't work, I can likely make the afternoon on the 25<sup>th</sup> work (however that is going to be a very full week for me).

Cheers

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 11 November 2022 11:26 am  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** Operations Manual and meeting - WGN110357

Hello Blair,

Please let me know when you will resubmit the Operations Manual for our approval.

We would like to either do a site visit or meet with you at our office soon. This will likely be [REDACTED] and myself.

Please could you advise what your availability is for these dates, between 10am and 4pm:

- Wednesday 16 November
- Friday 18 November
- Friday 25 November
- Wednesday 30 November

I will look to find a time that works for us all.

Kind regards, Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Wednesday, 2 November 2022 6:20 am  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** RE: Changes needed for operations manual please - WGN110357

Good morning Emily

I received your email but have been away from the office until today. I will get on to making these suggested changes and get them cleared by our CEO ASAP and get it back to you.

Regards

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 28 October 2022 12:28 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
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Please update:

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- [11.10] medical and other non-quarantine waste *must be* taken directly...
- [11.12] Please add the highlighted text in the application document where it mentions that the autoclave must be allowed to cool down before waste is removed
- P.37 [12.1] sharps – define “a safe place” and clarify this is inside the processing plant. Further, I don't think it is quite correct that they can be stored indefinitely, even if hypothetical, the intention in the application is that waste should be processed within 24hrs (medical) and 48hrs (quarantine). Please also define “shutdown” and “long shutdown” – what is meant by a shutdown exactly, e.g. could this be Christmas holidays or are we talking about some exceptional circumstance like if there is a major earthquake, pandemic lockdown etc. ?
- P.38 Please clarify that “in a safe area” envisages that the bags are stored inside the processing plant. I am skeptical about “odours cannot permeate through”.
- P.38 please update [3] and [4] to specify this is indoors, unless in the refrigerated container, and, as above, let me know more about what is meant by a shutdown. Are these shutdowns referenced or explained somewhere in the application document when consent was applied for?
- It would be handy to include some photographs, perhaps as an appendix, of the examples of the different bags, bins/skips and secure transport units.
- P.50 please append to the Ops Manual an example checklist form for the daily biofilter check
- 24.13 Why are cleandown procedures not applicable to this branch?

- P.57 – This cannot be 72 hours, it must be “all quarantine waste with the potential to cause odours shall be treated within **48 hours**” – it can then be transferred to a refrigerated container (or taken to another Interwaste branch) if it has ‘the potential for odour evolution’
- P.57 Please specify here that medical waste should generally be processed within 24 hours
- 26.13 – what are the roller doors inspected for?
- P.68 – this is good. I’m assuming the animal container is one of the refrigerated ones? What is meant by ‘Daniels’ out of interest?
- Section 28 on complaints – it is not just about odour-related complaints, please reference the text in the consent condition and also add our email address
- The diagram on p.86 – “1: plant receiving area” – should be indoors
- Please update the GWRC resource consent to the current version [34191]

And please let me know:

- P.33 – western roller door. Is this door still out of action? Will it be used again and what happened to the door exactly?
- Pp 25-26 of the application document: are bins washed and disinfected each time in the bin wash area? Please incorporate this requirement into the Ops Manual.
- P.32 of the application: is deodorising spray used at present for ‘particularly odorous’ bins? Please add to the Ops Manual.

Thanks for this, it will be good to get this approved by GWRC soon.

Ngā mihi, 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](mailto:blair@interwaste.co.nz)>

**Sent:** Tuesday, 25 October 2022 1:40 pm

**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>

**Subject:** FW: Request for OMP for GWRC approval - WGN110357

Good afternoon, Emily

I have updated this operating manual over the weekend and just had our upper management approve it.

Please accept this submission as our OMP for GWRC approval.

I have commented below in green which sections relate to the required information.

Please let me know if you have any feedback

Kind regards

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



International Waste Ltd

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---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Friday, 21 October 2022 11:03 am  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** Request for OMP for GWRC approval - WGN110357

Kia ora Blair,

I hope you're having a good week.

I wanted to rectify something with your air discharge consent WGN110357. The consent requires an Operations and Management Plan to be submitted to us for the Manager's approval. In 2020 I noticed that we have no record on file of this document having been approved. You sent me through the site's Ops Manual and I saved it to file but didn't arrange for the document to be approved.

We do need an approved OMP on file.

Please could you provide us an amended version of your Ops Manual that:

- Includes all the details below. The as-builts will be for the current version of the biofilter.
- Ideally doesn't include any extraneous material, as GWRC will likely provide the full OMP if requested (and the "OMP" has now been specifically requested) under OIA.

Given that most if not all of this material is already contained in the Ops Manual, I would like this material provided to me by no later than **COP Tuesday 1<sup>st</sup> November**.

At my end, I will review the document to make sure it includes the matters listed below, and to clarify anything if needed.

I will prepare a memo with a recommendation of approval/not to be signed by the Manager.

We may or may not receive technical advice on the document before approving it.

The OMP should be in accordance with the original consent application, attached (and the other associated docs provided in 2011 and the change of consent conditions material).

Kind regards,  
Emily

### Operation & Management Plan

11. The consent holder shall prepare and submit for approval to the Manager, Environmental Regulation, Wellington Regional Council an **Operation & Management Plan (OMP)** within three months of the commencement of this consent, or within

another timeframe to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. The scope of the OMP shall include but not be limited to the following information:

- As-built details of the Waste Reception and Waste Sterilisation areas, including relevant details of the extraction system, with records of significant maintenance undertaken during the current year [Section 24.5 / page 50](#)
- As-built details of the biofilter, with records of operating parameters, inspections undertaken and significant maintenance undertaken during the current year [Section 24.5 / page 50 \(& Appendix XIV\)](#)
- Procedures for storing, transferring and treating waste materials [Section 11/ pages 30-37](#)
- Operation and management of the waste treatment processes [Section 11/ pages 30-37](#)
- Methods for ensuring the biofilter monitoring and recording parameters required by conditions 13-15 of this consent are met [Section 24.5 / Page 50](#)
- Maintenance procedures for ensuring the good, clean condition of all trucks, containers and bins [Sections 8,9,10,15](#)
- Maintenance procedures for ensuring the good, clean condition of the waste sterilisation units, which are in accordance with the manufacturer's specifications [Section 24](#)
- An air management plan incorporating the operation and maintenance of all emissions control equipment (including the associated ducting for this equipment) [Section 26](#)
- Staff training on the process requirements, use of emissions control equipment, and emergency response [Section 5](#)
- Identification of any contingency and precautionary measures to be put in place (e.g. for upset conditions, plant breakdowns, power outages etc) [Section 29](#)
- Procedures for dealing with any spills of waste material [Section 6](#)
- Maintenance procedures for ensuring the building doors are kept in good working order [Section 26.1.3](#)
- Procedures for ensuring that the integrity of the building envelope is maintained to minimise the potential for fugitive emissions [Section 26](#)
- Procedures for responding to any complaints received relating to the discharges to air from the site [Section 28](#)

The consent holder shall ensure that the OMP is consistent with the conditions of this consent, and shall be updated as required, with the latest copy made available to the Manager, Environmental Regulation, Wellington Regional Council.

Any amendments to the OMP shall meet the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.

12. The consent holder shall, at all times, operate, maintain, supervise and control all processes and equipment on site to ensure compliance with the approved OMP pursuant to condition 11 and all other conditions of this consent.



**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.

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---

**Subject:**

FW: Ozone Contact Centre No. 23419 [EMAIL] - Created by Kate Ruffell

---

**From:** Emily McDowall <Emily.McDowall@gw.govt.nz>**Sent:** Thursday, 1 December 2022 3:57 pm**To:** Blair Chalmers <blair@interwaste.co.nz>**Subject:** FW: Ozone Contact Centre No. 23419 [EMAIL] - Created by [REDACTED]

Hi Blair,

I'm just going to forward these through anonymised for your complaints register. I was going to put them in the table first but trying to save time.

Will chat on the phone when we can.

Cheers, Emily

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Thursday, 1 December 2022 8:38 am**To:** [REDACTED]**Subject:** Ozone Contact Centre # 23419 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23419 [ [View Transaction >>](#) [Click here to view your CC Transaction](#) ]

Created: 01 Dec 2022 @ 08:37am by [REDACTED]

Type/Subtype: Env Protection Incident / Env Protection Incident all types

Priority: 1 HOUR

Action: EMAIL

Your Position:

Message:

Transaction no. 23419, received 01 Dec 2022 at 08:37am has been assigned to you. Please Schedule the action immediately.

Notifier:

Source Parcel:

TA: Porirua City Council

Details: Porirua broken Hill road Interwaste. Smell coming from Interwaste is nauseating and unable to breathe properly and run business. 6/6 smells toxic, plastic, metallic 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>

This message was automatically generated by the Ozone Contact Centre

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



---

**Subject:**

FW: Ozone Contact Centre No. 23421 [EMAIL] - Created by [REDACTED]

---

**From:** Emily McDowall**Sent:** Thursday, 1 December 2022 4:00 pm**To:** Blair Chalmers <blair@interwaste.co.nz>**Subject:** FW: Ozone Contact Centre No. 23421 [EMAIL] - Created by [REDACTED]

---

**From:** Environmental Protection <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Thursday, 1 December 2022 12:59 pm**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>**Subject:** Fwd: Ozone Contact Centre # 23421 [EMAIL] - Created by [REDACTED]

Hey, Emily another Interwaste for ya

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Thursday, December 1, 2022 12:55 PM**To:** Environmental Protection**Subject:** Ozone Contact Centre # 23421 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23421 [ View Transaction >> [Click here to view your CC Transaction](#) ]

Created: 01 Dec 2022 @ 12:52pm by [REDACTED]

Type/Subtype: Env Protection Incident / Env Protection Incident all types

Priority: 1 HOUR

Action: EMAIL

Your Position: EPOINBOX

Message:

Transaction no. 23421, received 01 Dec 2022 at 12:52pm has been assigned to you. Please Schedule the action immediately.

Notifier: Unknown Unknown

Source Parcel:

TA: Porirua City Council

Details: Interwaste Wellington Broken Hill Road, Kenepuru, Porirua The caller mentioned that there was a really bad smell coming from there as it were burning plastic or sewer smell. The caller also mentioned that they could the shipment containers being moved and forklifts until 4:00am. \*The smaell started early in the morning and has gotten worse since then.\* \*The caller also mentioned that they have noticed an orange liquid being discharged into the stream. Apologise, i forgot to check the timeline for that.\* \*They mentioned that they had some samples tested and would like to discuss the outcomes with someone.\* 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>

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WF/15/0/0/0/AFTER/R/EMAIL/U/EPOINBOX

---

**Subject:** FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by [redacted]  
**Attachments:** IMG\_1633.PNG

---

**From:** Blair Chalmers <blair@interwaste.co.nz>  
**Sent:** Tuesday, 6 December 2022 4:45 pm  
**To:** Emily McDowall <Emily.McDowall@gw.govt.nz>  
**Cc:** Valentin Czibesz <valentin@interwaste.co.nz>; Nigel Priest <Nigel@interwaste.co.nz>  
**Subject:** RE: Ozone Contact Centre No. 23422 [EMAIL] - Created by [redacted]

Good afternoon Emily

I am in Auckland today, Christchurch tomorrow so yes, I have copied in Valentin (Val) Czibesz, our Wellington Operations Manager. Val is normally onsite most of the time so will be able to give you real time updates when required. I do ask that you please keep me copied in with all communications, so I have a record.

Looking back on Thursday morning last week, I cannot see a time where the roller door was open for more than 5 minutes at a time. There was an incident in the morning with a driver hitting the door but this was closed very promptly and repairs completed within 2 hours.

I was on site from 6am preparing for a meeting / site inspection I had with MPI, the site was clean, tidy and everyone was working to get work done so they could go and enjoy the work function we had that afternoon.

I also had a courtesy call with [redacted] yesterday afternoon. We had a good discussion around odour monitoring, and he will be providing me a quote for third party site odour monitoring.

I spoke with the neighbour on Thursday that lives behind the Vape Canyon site (still immediately adjacent to our site), his main issue is noise and we are looking at ways to minimise that including changing our LPG forklifts to electric. He was also full of misinformation, making a lot of the same claims that Kris has been.

Our complaints register has been updated.

The comment made about catching up on a backlog of waste is also incorrect, we have been working 24 hours to keep up with demand. As you will see in the attached screenshot, there is no more waste onsite than usual.

Cheers

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, 1 December 2022 9:27 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** RE: Ozone Contact Centre No. 23422 [EMAIL] - Created by Kaiya Howarth

Thanks Blair. When you are next at Kenepuru, please could you check your CCTV from ~9.05-9.35am and tell me how long the roller door was open within that time.

We have our department Christmas function tomorrow, it's that time of year!

Yes they can, to a point.

I was thinking too, is there a lead Kenepuru-based staff member I should contact as well as you if you are off-site given you're the regional manager e.g. to check what is happening real-time in response to complaints? Thanks.

Cheers, Emily

---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Thursday, 1 December 2022 6:32 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** Re: Ozone Contact Centre No. 23422 [EMAIL] - Created by Kaiya Howarth

Hi Emily

Apologies for the late reply. We had an MPI audit this morning from 9am until 11:30am and no unusual odours were noticed. Most staff have been off site since 12:30pm for a Christmas Function.

Were all of these complaints made today?

Can a member of the public make multiple complaints in a single day? (Can they make as many complaints as they want?)

Cheers

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International Waste Ltd  
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---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, December 1, 2022 4:00:58 PM  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by Kaiya Howarth

---

**From:** Environmental Protection <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Thursday, 1 December 2022 1:12 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** Fwd: Ozone Contact Centre # 23422 [EMAIL] - Created by Kaiya Howarth

Another one from Interwaste for ya

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Thursday, December 1, 2022 1:09 PM  
**To:** Environmental Protection  
**Subject:** Ozone Contact Centre # 23422 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23422 [ View Transaction >> [Click here to view your CC Transaction](#) ]  
Created: 01 Dec 2022 @ 12:59pm by [REDACTED]  
Type/Subtype: Env Protection Incident / Env Protection Incident all types  
Priority: 1 HOUR  
Action: EMAIL  
Your Position: EPOINBOX

Message:

Transaction no. 23422, received 01 Dec 2022 at 12:59pm has been assigned to you.  
Please Schedule the action immediately.

Notifier:

Source Parcel:

TA: Porirua City Council

Details: Caller has rung to report the foul odour coming from Interwaste next door. This morning the smell was very prevelant at 8am, getting worse and worse currently rated a 6/6. They have closed their doors multiple times and have had customers walk away because they couldn't handle the smell. It's a mixture of nausiating chemical smell and human faeces or rotten flesh. They are at and have had two of their whole salers say they don't want to stock them anymore because of the horrible smell. Even when stock has come in, the caller has to pack it away to avoid being contimated. The smell hangs around the whole place.

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---

**Subject:** FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by [REDACTED]

---

**From:** Blair Chalmers <blair@interwaste.co.nz>  
**Sent:** Thursday, 1 December 2022 6:32 pm  
**To:** Emily McDowall <Emily.McDowall@gw.govt.nz>  
**Subject:** Re: Ozone Contact Centre No. 23422 [EMAIL] - Created by [REDACTED]

Hi Emily

Apologies for the late reply. We had an MPI audit this morning from 9am until 11:30am and no unusual odours were noticed. Most staff have been off site since 12:30pm for a Christmas Function.

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Can a member of the public make multiple complaints in a single day? (Can they make as many complaints as they want?)

Cheers

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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Thursday, December 1, 2022 4:00:58 PM  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Subject:** FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by [REDACTED]

---

**From:** Environmental Protection <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Thursday, 1 December 2022 1:12 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Subject:** Fwd: Ozone Contact Centre # 23422 [EMAIL] - Created by [REDACTED]

Another one from Interwaste for ya

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>  
**Sent:** Thursday, December 1, 2022 1:09 PM  
**To:** Environmental Protection  
**Subject:** Ozone Contact Centre # 23422 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23422 [ [View Transaction >>](#) [Click here to view your CC Transaction](#) ]  
Created: 01 Dec 2022 @ 12:59pm by [REDACTED]  
Type/Subtype: Env Protection Incident / Env Protection Incident all types  
Priority: 1 HOUR

Action: EMAIL  
Your Position: EPOINBOX

Message:

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Notifier:

Source Parcel:

TA: Porirua City Council

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---

**Subject:**

FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by [REDACTED]

---

**From:** Emily McDowall**Sent:** Thursday, 1 December 2022 4:01 pm**To:** Blair Chalmers <blair@interwaste.co.nz>**Subject:** FW: Ozone Contact Centre No. 23422 [EMAIL] - Created by [REDACTED]

---

**From:** Environmental Protection <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Thursday, 1 December 2022 1:12 pm**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>**Subject:** Fwd: Ozone Contact Centre # 23422 [EMAIL] - Created by [REDACTED]

Another one from Interwaste for ya

---

**From:** [Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz) <[Environmental.Protection@gw.govt.nz](mailto:Environmental.Protection@gw.govt.nz)>**Sent:** Thursday, December 1, 2022 1:09 PM**To:** Environmental Protection**Subject:** Ozone Contact Centre # 23422 [EMAIL] - Created by [REDACTED]

Ozone Contact Centre

Transaction: 23422 [ View Transaction >> [Click here to view your CC Transaction](#) ]

Created: 01 Dec 2022 @ 12:59pm by [REDACTED]

Type/Subtype: Env Protection Incident / Env Protection Incident all types

Priority: 1 HOUR

Action: EMAIL

Your Position: EPOINBOX

Message:

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Source Parcel:

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This message was automatically generated by the Ozone Contact Centre

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---

**Subject:** FW: Please Explain letter relating to 12 January 2023 Objectionable Odour  
**Attachments:** Please Explain Letter for Interwaste re. 12.01.23 Objectionable Odour.pdf

---

**From:** Emily McDowall  
**Sent:** Friday, 20 January 2023 4:57 pm  
**To:** Valentin Czibesz <valentin@interwaste.co.nz>  
**Cc:** Blair Chalmers <blair@interwaste.co.nz>  
**Subject:** Please Explain letter relating to 12 January 2023 Objectionable Odour

Hello Val,

Please find attached a *Please Explain* letter relating to this incident, for your response.

Regards,  
Emily



**Emily McDowall**  
Resource Advisor Kaitohutohu – Environmental Regulation  
**Greater Wellington Te Pane Matua Taiao**  
**021 191 9689**  
100 Cuba Street, Wellington  
Follow us online: [Facebook](#) | [Twitter](#) | [gw.govt.nz](http://gw.govt.nz)

Please note that my usual days of work are Wednesdays, Thursdays and Fridays.

---

**From:** Valentin Czibesz <valentin@interwaste.co.nz>  
**Sent:** Tuesday, 17 January 2023 12:13 pm  
**To:** Emily McDowall <Emily.McDowall@gw.govt.nz>; Blair Chalmers <blair@interwaste.co.nz>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

The pickups are usually done around 12-1230PM and the bins are moved back inside in a few minutes depending on what the operators are doing when the bins are dropped off. I have asked the operators to have the pickups and drop offs done inside the plant starting from today so any odour coming out of them will pass through the biofilter.

REGARDS

VALENTIN CZIBESZ  
WELLINGTON OPERATIONS MANAGER



International Waste Ltd

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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Tuesday, 17 January 2023 11:49 am  
**To:** Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>; Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

Thanks Val. What time were the tips brought back and how long were they outside for? Cheers, Emily

---

**From:** Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>  
**Sent:** Monday, 16 January 2023 5:51 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>; Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: Notification received yesterday - please advise of waste processed

I had a good look at the waste coming in for the two days before and I couldn't find anything that would produce odour like the one described. We received 2646 kg of medical waste and 485 kg of quarantine on Wednesday, and 3255 kg of medical waste and 4425 kg of quarantine waste on Thursday. There were no animals of any kind for burial. The only thing I can think could smell is the empty skips brought back by the Envirowaste back from the tip. They do smell a bit just like the domestic wheelie bins at home. My intention is to get the pickups and drop offs done inside the building so the skips don't spend any time on the driveway before getting washed .

REGARDS

VALENTIN CZIBESZ  
WELLINGTON OPERATIONS MANAGER



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---

**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>

**Sent:** Friday, 13 January 2023 8:34 pm

**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>; Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>

**Cc:** [REDACTED]

**Subject:** Notification received yesterday - please advise of waste processed

Hello Blair and Val,

Thanks Val for hosting me on-site this afternoon, much appreciated.

As mentioned, yesterday (12 January) at 11.34am we received a notification of odour emanating from Interwaste. The rostered duty officer attended and completed a 10 minute odour assessment beyond Interwaste's boundary. This was at 12:34pm.

The wind direction was southerly and ~34kph.

Given his ratings and descriptions of the smell, I need you to please provide records of all waste received, stored and processed on site yesterday.

Please pinpoint what was processed in the middle of the day as far as possible.

Kind regards,

Emily



**Emily McDowall**

Resource Advisor Kaitohutohu – Environmental Regulation

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stated, any views or opinions expressed are solely those of the author, and do not represent those of the organisation.

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**Subject:**

FW: Questions about bin left on Broken Hill Road 24.02.23

---

**From:** Emily McDowall**Sent:** Friday, 3 March 2023 3:41 pm**To:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>; Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>**Subject:** RE: Questions about bin left on Broken Hill Road 24.02.23

Hello Nigel and Val,

Apologies for the delay in responding and thanks for your reply.

I won't follow this notification up further, but I would appreciate if you could send me some a few photos of your bins (showing the top, sides and markings) for the record.

It is great to hear that a new layer has been added to the biofilter.

Regards, Emily

---

**From:** Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>**Sent:** Monday, 27 February 2023 10:25 am**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>; Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>**Cc:** [REDACTED]**Subject:** RE: Questions about bin left on Broken Hill Road 24.02.23

Hi Emily,

With the link to the incident as posted on YouTube, we have a few concerns:

- Unsubstantiated claim that it is an Interwaste bin.
- No indication of who the driver was who dropped this bin.
- This bin has none of our markings and is clearly not an Interwaste bin.
  - None of our bins have lids.
- We strictly adhere to our conditions of Operation and have never dumped a bin roadside.
- The volume of rubbish trucks of numerous types operating on this particular road is considerable. To lay fault at Interwaste at any slight opportunity presented, when the carrier is actually unknown is quite a spurious claim.
- We have no information relating to the details of this bin.

Also attached are the pictures confirming the recent addition to the Biofilter. A substantial new layer has been added as the one of the suggested actions as given in the meeting dated 09 December 2022.

Any further questions please do not hesitate to call.

Regards,

**NIGEL PRIEST**  
NATIONAL OPERATIONS MANAGER



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**From:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Sent:** Sunday, February 26, 2023 1:09 PM  
**To:** Valentin Czibesz <[valentin@interwaste.co.nz](mailto:valentin@interwaste.co.nz)>; Nigel Priest <[Nigel@interwaste.co.nz](mailto:Nigel@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** Questions about bin left on Broken Hill Road 24.02.23

Hello Val, Nigel,

Interwaste's neighbour linked me this video on Friday. [Interwaste leaving infectious waste outside of their property - YouTube](#)

Please let me know:

- Why has this skip been left on the road? (As opposed to being inside the Interwaste factory as we have discussed.)
- Is it on its way to the landfill or coming back from the landfill?
- If on its way back, why has it not been properly scraped or washed out?
- What is the substance visible inside?
- What business/DHB did this skip originate from?
- Why is the lid open?
- How long was this skip left on the street?

Regards, Emily



**Emily McDowall**  
Resource Advisor Kaitohutohu – Environmental Regulation  
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**Subject:** FW: Record of odour complaints 25.10.22 to 17.11.22 - WGN110357  
**Attachments:** Odour Complaints 25.10.22 to 17.11.22 for Interwaste - WGN110357.docx

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**From:** Emily McDowall <Emily.McDowall@gw.govt.nz>  
**Sent:** Thursday, 17 November 2022 3:43 pm  
**To:** Blair Chalmers <blair@interwaste.co.nz>  
**Cc:** [REDACTED]  
**Subject:** Record of odour complaints 25.10.22 to 17.11.22 - WGN110357

Kia ora Blair,

I hope things are going well in Christchurch.  
We look forward to receiving the updated Ops Manual early next week – if you could please send it through by COP Tuesday 22<sup>nd</sup> November.

Please find attached a record of odour complaints which we have received lately.  
Apologies that I have not sent these through straight away, I had done this up until the 21 October but missed from then until now.

Please could you save this document as part of Interwaste’s complaints register. And could you also let me know:

- 8 November – please could you review CCTV footage and let me know how long the roller door was open around 12.18pm.
- 8 November – what waste was being processed on this date, and was there a reason why more odour might have been produced?
- 10 November – what waste was being processed on site in the afternoon around 3.26pm? Do you know why someone might have felt “unable to breathe”?
- This morning 17 November – please could you find out what waste was being processed around 9.59am and whether there were any problems.

Kind regards, Emily



**Emily McDowall**  
Resource Advisor Kaitohutohu – Environmental Regulation  
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---

**Subject:** FW: thanks for meeting with us today

---

**From:** Emily McDowall  
**Sent:** Wednesday, 30 November 2022 1:34 pm  
**To:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Cc:** [REDACTED]  
**Subject:** RE: thanks for meeting with us today

Thanks again Blair for coming in, it was good to chat in person after some time and for you to meet [REDACTED]

Please keep me posted on the question of the animal carcasses stored beyond 24 hours and whether a new refrigerated container will be used or a s 127 change of consent conditions sought from GWRC. Section 127 change of consent condition applications are not uncommon for us to receive.

When those final changes are made to the Ops Manual please send back the document and I'll write up a memo for the manager's approval.  
Note that the cool down period may be less critical so long as this waste is kept indoors, also you have let me know that this autoclave does not have a cool-down function like the last one. And you clarified that the bags stored in the storage container relates to the extended shutdowns only (maybe clarify that on page 38 if it's ambiguous).

Thanks for sending through the SOP – as a precaution I suggest adding that the doors should be closed for this 10mins when the factory is vacated, and ensuring that staff are educated about this. That way fugitive discharges should be minimised and the odour should be captured through the biofilter. And I wonder if staff can identify if material contaminated by the client with formalin has been processed e.g. by the particular smell, so they know to wear a respirator and vacate, and close the doors.

Ngā mihi, Emily



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---

**From:** Blair Chalmers <[blair@interwaste.co.nz](mailto:blair@interwaste.co.nz)>  
**Sent:** Wednesday, 30 November 2022 12:50 pm  
**To:** Emily McDowall <[Emily.McDowall@gw.govt.nz](mailto:Emily.McDowall@gw.govt.nz)>  
**Cc:** [REDACTED]  
**Subject:**

**BLAIR CHALMERS**  
CENTRAL REGIONAL MANAGER

**INTERWASTE**



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## Emily McDowall

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**Subject:** Interwaste Meeting  
**Location:** Interwaste Kenepuru

**Start:** Fri 10/02/2023 10:45 am  
**End:** Fri 10/02/2023 12:15 pm  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** Emily McDowall  
**Required Attendees:** Blair Chalmers

Hi Blair,

How does this time work for you, Nigel and Val?

Apologies that this is the morning of your last day. [REDACTED] is away until the 6<sup>th</sup> and I'd like a chance to discuss the outcome of our meeting last year with him before this meeting. This will also likely give us a chance to discuss the outcome of our investigation into the odour on the 12<sup>th</sup>.

I will let you know if anyone else from GWRC is attending.

Kind regards, Emily



**Emily McDowall**

Resource Advisor Kaitohutohu – Environmental Regulation

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## FILE NOTE

DATE 30 November 2022  
AUTHOR Emily McDowall  
SUBJECT Meeting with Blair Chalmers, Interwaste  
FILE NUMBER WGN110357

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At 11am on Wednesday 30 November 2022, [REDACTED] and I (Resource Advisor, Environmental Regulation) met with Blair Chalmers (Central Regional Manager, International Waste Limited – Interwaste). Our conversation covered the following:

### GWRC expectations of Interwaste

- All waste should be stored inside the factory, as per the application document. The exceptions are:
  - Cytotoxic waste awaiting shipment to Australia.
  - Waste stored in refrigerated shipping containers.
  - Waste which has recently been delivered to Interwaste or which is about to be taken to landfill. (This waste should only be left outside for very short periods of time.)
  - In the event of an extended plant shutdown – Blair has supplied GWRC with documentation relating to the plant’s contingency measures in these instances.
- The roller doors should be prompted closed, within 10 mins maximum, as per the consent conditions. GWRC is aware of times when the doors have been open for lengths of time exceeding 10 mins, but we have not yet detected offensive or objectionable discharges.

### Consent-related points of discussion

- Interwaste intends to apply for a consent renewal at this location. We explained that preparations should be made for this application well in advance and that the application must be received at least six months before the existing consent expires.
- We stated that we would most likely require emissions testing results to be provided with the new assessment of environmental effects (AEE) to assure us that odour was the only contaminant requiring consent, or to properly analyse and consent any additional contaminants. The AEE would be reviewed by an air discharge expert for GWRC.

- We emphasised that a section 127 change of conditions application should be sought for any practices which diverge from the application and its associated documents. An area where current practice may diverge from what was envisaged in the application is the storage of animal carcasses longer than one day. At present these carcasses are stored inside the factory in bins before being disposed of at landfill twice weekly. However, the application document suggests this waste should be stored in a refrigerated container if it is on the premises for longer than 24 hours. Blair is going to discuss this further with the Interwaste directors.

### Interwaste updates

Blair provided some site updates.

- In response to the aggressive behaviour shown by Vape Canyon employees, the Interwaste directors have asked that Wellington staff do not engage with the neighbours at present. Interwaste staff are consequently not currently taking phone calls from Vape Canyon.
- Blair has received a quote for installing automatic door alarms (for both roller doors).
- The western roller door is scheduled to be repaired by early February.
- Interwaste is considering purchasing a new refrigerated shipping container, given that it would be uneconomic to repair the current shipping container which broke seven years ago.
- Interwaste is also considering spraying the trade waste septic tanks with a deodoriser.

### Responses to questions

Blair also provided some clarifications to questions which I asked about the site:

- There is a Standard Operating Procedure (SOP) for processing waste containing formaldehyde. Where it is known that waste contains formaldehyde, this waste should have been placed by Interwaste's clients in a red bin with a yellow lid. This waste is processed at the beginning or end of the day so that staff can either wear respirators or exit the building. Interwaste may receive waste that clients have contaminated with formaldehyde. When this waste is processed through the autoclave, fumes may be discharged for 10-15 minutes.
- Blair maintained that the autoclave does not require a cooling-down period. The previous autoclave (used at the former Seaview plant) could not be opened until it had cooled down, whereas this machine has no such automatic cooling function: the machine's cycle finishes once it has depressurised. The processed waste is hot because it has been heat-treated at 140 degrees Celsius. Waiting for the waste to cool down before proceeding to the next load would not be viable given the volumes of waste received. It could also result in the need to extend operating hours into the night. Processed waste is put into the back of trucks which

are parked inside the factory. The reason steaming skips were placed on the boundary in the video footage uploaded to YouTube was due to there being no room for trucks to park inside the factory at this time. Blair is aware that this processed waste should be kept inside the factory. I asked whether trucks would be parked in the building overnight (given that Spicer Landfill only accepts waste deliveries until 4pm) and Blair confirmed that this was the case.

- Blair considered that the annual emptying of the trade waste sump by a sucker truck could contribute to odour discharges. I asked if perhaps the sump needs to be cleared more regularly. Blair noted that Interwaste had made the decision to undertake this activity annually with a view to reducing odours for the neighbours given the process is smelly.
- Blair also noted that after a period of not operating the autoclaves for several days, he noticed an odour emanating from the trade waste sump system. He speculated that the odour was stronger on this occasion due to the lack of liquids from the steam-sterilising process to dilute it.
- Blair explained that solids are collected in Interwaste's three-tank trade waste system (to be cleared annually), whereas liquids are constantly discharged into the sewer system. The site's trade waste system includes a non-return valve which closes off discharges when the street sewer system is overloaded. This happens in heavy rain events as Spicer Landfill's leachate discharge combined with stormwater entering the sewage system causes the sewer line to reach capacity. Interwaste generates high volumes of trade waste given that the autoclave technology is based on steam-sterilisation. Interwaste's tanks fill up within a few hours in a heavy rain event. Interwaste has needed to phone Spicer Landfill in the past to ask them to pause their landfill discharge so that Interwaste can first clear their wastewater discharge. I asked Blair whether there have been any discharges from the site in heavy rainfall events and he told me that discharges have been confined to the Interwaste property.

The meeting concluded at midday.