

IN THE MATTER OF The Resource Management Act 1991

AND

IN THE MATTER OF Application CRC102491 by
General Cable Limited for a
discharge permit.

Decision of the Hearing Commissioner

Appointment

This is the decision of Hearing Commissioner Barry Loe, appointed by Canterbury Regional Council (CRC, Environment Canterbury) to hear and decide the application by General Cable New Zealand Limited (the Applicant) for resource consent to discharge contaminants to air under Section 15 of the Resource Management Act 1991 (RMA).

Decision Summary

The application is granted, subject to conditions for a term of 20 years.

Hearing

The Hearing of the application and submissions was held at Lincoln on Wednesday 19 December 2012, and I undertook a site visit on Friday 21 December 2012. Having considered all the relevant information, the Hearing was closed on 8 February 2012.

Appearances at the Hearing

For the Applicant:

Mr David Pedley, Counsel

Mr John Watt, Site Production Manager, General Cable Ltd, Christchurch

Mr John Iseli, Air Quality Consultant

For the Submitter:

Mr Graeme Peters

Mr Mike Mora

CRC Consent Reporting Officer:

Mr Kevin Swete

Introduction

General Cable New Zealand Limited operates a factory located on Main South Road, Riccarton, Christchurch where it manufactures insulated metal and fibre optic cables and wires for energy, industry and telecommunications markets. The factory has been on the site for over 60 years.

The processes undertaken at the site result in various discharges to air from a range of sources including:

- Coal and diesel fired boilers,
- Diesel and LPG fired heaters.
- PVC heating, mixing and extrusion,
- Heating and drawing of wire, and
- Coating of cables with lead or tin.

These discharges to air from the site have been authorised by a resource consent issued in 1999 for a period of 15 years. This consent expired in 2010, but as the application to replace that consent was made more than 6 months before the expiry date, the discharge can continue under the authority of s124(1)(d) until this application is determined.

There is also a diesel driven generator on the site. The discharge to air from the generator is authorised under a separate consent that expires in 2018.

The General Cable site is located in an industrial zone of the Christchurch City Plan, with Riccarton High School and residential areas along the eastern boundary.

Written Approval to the Application

The Applicant obtained written approval for the application from Riccarton High School, signed by the school's Executive Officer.

Notification and Submissions

The application was publicly notified on 12 May 2012, over two years after it was accepted by Canterbury Regional Council. The delay resulted from requests by Canterbury Regional Council for further information, debate between the applicant and Canterbury Regional Council over the notification process, and the impact of the Canterbury earthquakes commencing in September 2010.

Seven submissions were received by Canterbury Regional Council, with three requesting a hearing. Two submitters subsequently withdrew their request for a hearing, with one submitter to be heard.

Statutory provisions & Assessment

The Resource Management Act 1991 (RMA)

Section 15 (1)(c) of the RMA states:

“No person may discharge any-

(a)...

(b)...

(c) Contaminant from any industrial or trade premises into air;

(d)...

unless the discharge is expressly allowed by a national environmental standard or other regulations, a rule in a regional plan as well as a rule in a proposed regional plan for the same region (if there is one) or a resource consent.

National Environmental Standards (NES)

NES regulations for air quality came into effect in September 2005, and these were in force when the application was accepted. However, the regulations were amended in June 2011 to revoke the 2005 regulations that may have applied to this discharge, and it is the 2011 regulations that apply to a decision on this application.

The NES does not expressly allow this discharge.

The 2011 regulations direct that, *“A consent authority must decline an application for a resource consent ... to discharge PM₁₀ if the discharge to be expressly allowed by the consent would be likely, at any time, to increase the concentration of PM₁₀ (calculated as a 24-hour mean under Schedule 1) by more than 2.5 micrograms per cubic metre in any part of a polluted airshed other than the site on which the consent would be exercised.”*

There will be a reduction in the particulate matter discharged from this site because of implementation of a filter system on the boiler. While there is also on-going reduction in maximum PM₁₀ concentrations in the Christchurch airshed the new maximum rate of PM₁₀ discharge from the General Cable site is predicted to be no more than 1.5 micrograms per cubic metre on neighbouring properties. This is a significant reduction over the discharge without the filtration system, therefore this application will not increase the PM₁₀ concentration in any part of the Christchurch airshed. The NES regulations do not prevent a decision to grant this application.

Natural Resources Regional Plan (NRRP)

The Natural Resources Regional Plan (NRRP) Chapter 3 Air Quality became operative in part on 27 October 2009. The provisions made operative at that time included Objective AQL1, Policies AQL5 and AQL8, and Rules AQL38 to AQL57 that apply to discharges to air from industrial or trade premises. The remainder of NRRP became operative on 11 June 2011.

There is no rule that specifically authorises the discharge proposed in the application, therefore the discharge falls within the scope of Rule AQL57, *Industrial or trade premises and processes not complying with Rules AQL38 to AQL56 or not otherwise identified anywhere in Canterbury – discretionary activity*.

This application is for a **discretionary** activity.

Evidence & Information provided

The application and the evidence presented by the applicant and submitters to the Hearing is a matter of public record. Where evidence or information relates to the principal issues and my findings on these I have referred to it.

The Officer's report

The Officer's report of Mr Swete is also a matter of public record. My consideration of the application and evidence includes the advice provided in Mr Swete's report, and where it is relevant to the identification and analysis of the principal issues, I have referred to it.

The Applicant's Right of Reply

The Applicant's reply was presented verbally, and addressed a range of matters that are included in the summary of the principal issues.

Principal issues in contention and summary of the evidence

The two principal contaminants discharged at this site are particulate matter (PM₁₀) and sulphur dioxide (SO₂), both in emissions from the coal fired boiler, and to a much lesser extent from the diesel fired boiler and space heaters. There is a range of other contaminants discharged to air from combustion and manufacturing processes at the site, including nitrous oxide, hydrogen chloride, vinyl chloride, lead, zinc and tin.

Particulate Matter

Particulate matter is the mixture of very small particles that are discharged to air, in this case from fuel burning. The particles can be inhaled deep into the respiratory system, affecting the lungs and heart. The applicant has recently installed a bag filter on the coal fired boiler. The

bag filter will capture particulate matter in the discharge to air from the boiler. Mr Iseli stated the bag filter would result in a fivefold reduction in the maximum emission rate for particulate matter from that authorised under the previous consent, and the maximum daily discharge of particulate matter will reduce from 21 kilograms per day to less than 5 kilograms per day. This reduction will contribute to the overall reduction in PM₁₀ concentration in Christchurch air. Under meteorological conditions when the potential for air pollution is high, the discharge from General Cable will result in PM₁₀ concentrations on neighbouring properties of up to 1.5 micrograms per cubic metre. This concentration is 3% of the NES air quality standard for PM₁₀ of 50 micrograms per cubic metre (24-hour average). This concentration is a significant reduction from that which occurred in the past, and will contribute to improved air quality in the local area. The bag filter will also minimise the potential for deposition of larger particulate matter such as soot and ash on neighbouring properties, which Mr Peters told the hearing, has been a nuisance in the past.

Sulphur dioxide

Sulphur dioxide is a product of combustion of coal and other fossil fuels and the amount of SO₂ discharged is directly related to the amount of sulphur in the fuel. Sulphur dioxide can have significant impacts on human health, particularly respiratory symptoms and disease. In the previous consent, the limit on SO₂ discharge was given effect by restricting the sulphur content of the coal, thereby limiting the type of coal used, and the amount of coal burned per day. The applicant is proposing that coal use is limited by the energy input from the coal, per hour and per day. This will provide for variation in the calorific value of the coal in different blends as supplies may change over time.

By using the daily energy input the maximum 24 hour SO₂ emission rate is reduced by 17% over that authorised by the previous consent. The applicant also proposes a daily SO₂ emission limit. When the reduced SO₂ emissions were used by Mr Iseli to predict the peak ground level concentrations of SO₂ in the vicinity of the discharge, combined with the maximum expected background concentrations of SO₂, the peak concentration was 100 micrograms per cubic metre (24-hour average). This cumulative value is less than the New Zealand Guideline of 120 micrograms per cubic metre (24-hour average).

While New Zealand ambient air quality guidelines are generally in accord with those of the World Health Organisation (WHO), in October 2006 WHO released its first global air quality guidelines, which reduced the 24-hour average sulphur dioxide guideline from 120 micrograms per cubic metre to 20 micrograms per cubic metre via a 50 micrograms per cubic metre interim guideline.

Mr Iseli told the hearing that the WHO has adopted a precautionary approach based on epidemiological studies undertaken in large metropolitan areas where SO₂ emissions were predominantly from motor vehicles and concentrations were consistently high every day. In Christchurch most of the SO₂ is produced from by industrial sources, and peak concentrations only occur on occasional days under specific meteorological conditions. There is still considerable debate in the scientific community about the WHO guidelines, the studies they are based on and their applicability for New Zealand. The Ministry for the Environment has not yet expressed any intent to adopt the WHO guideline. Mr Iseli stated that while he considered the current New Zealand guideline to be applicable for this application, General Cable would be willing to accept a condition that invoked a review of the consent should a change to the SO₂ guideline be adopted in New Zealand.

Other Contaminants

Mr Iseli, and Mr Swete confirmed, that all other contaminants would be discharged in low concentrations, and the predictions of ground level concentrations of these contaminants would all be 'well within' New Zealand and international guidelines.

Mitigation & Monitoring

The principal mitigation measure adopted by General Cable is the bag filtration system recently installed on the coal boiler flue. General Cable is also rationalising its operations on the site to create greater efficiencies in production. Some areas of the plant that have had discharges to air in the past have been, or are planned to be closed, and others downsized or relocated on the site. This is reducing overall the discharges to air from the site.

The applicant in consultation with submitters, particularly the District Health Board and the Ministry of Education, has developed a proposed monitoring programme and other conditions of consent. These conditions do not require off-site monitoring of contaminants. The Board and the Ministry each withdrew their request for a hearing based on these conditions.

Mr Mora and Mr Peters sought that the WHO guidelines for SO₂ be imposed in any consent granted, but with 5 years to meet those guidelines, and that off-site monitoring at near-by locations should be required. They also sought that any complaints made by telephone be recorded at both Canterbury Regional Council and General Cable. If there were 'sufficient' complaints, this should trigger emission testing.

Main findings

I agree with the findings of Mr Iseli and Mr Swete that the predicted ground level concentrations of all contaminants discharged will be within the relevant New Zealand

guidelines for ambient air quality. The commissioning of the bag filtration system on the coal fired boiler flue will significantly reduce PM₁₀ concentrations in the discharge and improve air quality. I agree that other contaminants can be discharged without any additional treatment.

I accept the explanation from Mr Iseli and Mr Swete that imposing the WHO guideline for sulphur dioxide as a condition of consent would be unreasonable at this time as this standard has not yet been accepted as applicable to New Zealand by the Ministry for the Environment. There is also doubt that such a standard is necessary to protect public health in Christchurch. However, I accept that, should the New Zealand Guidelines or National Environmental Standards, or regional plan limits for sulphur dioxide be changed to reflect lower emission rates, then the conditions of the consent should be reviewed.

As the predicted ground level concentrations of all the other contaminants discharged will be within New Zealand or international air quality guidelines at all locations including neighbouring land, off-site ambient air quality monitoring is not reasonably justified as a condition of this consent. However, there will be a requirement to monitor the discharge of these contaminants, and should the results of this indicate that concentrations are higher than were used in the predictive modelling, the consent conditions could be reviewed.

Section 104

Section 104(1)(a) The effects on the environment

Under this section of the RMA I must have regard to the actual and potential effects on the environment of allowing the activity (within the constraint of s104(3)(a)(ii) – see below). These are the actual and potential effects on the health and well-being of affected people from the contaminants discharged to air by the Applicant in the way proposed in the application. I find that there is not likely to be any adverse effects on health from the discharge. While there may be some reduction in amenity values for some people living adjacent to the General Cable site, this is not likely to have more than minor adverse effects on those people.

Section 104(1)(b) National Environmental Standard, Policy Statements and Plans

National Environmental Standard for Air Quality (NESAQ)

The NESAQ sets limits, in respect of the General Cable application, for the discharge of PM₁₀, sulphur dioxide, nitrogen oxide and carbon monoxide. The discharge will not breach the limits for any of these contaminants.

Regional Policy Statements

The policies of the operative Regional Policy Statement and the proposed Regional Policy Statement relevant to this application have been considered. I note the policy outcomes

include “to maintain or improve air quality” and “to ensure adverse effects are avoided, remedied or mitigated.” The measures taken by the applicant are consistent with the policies.

Natural Resources Regional Plan (NRRP)

The Objectives and Policies of NRRP seek to avoid localised health and nuisance effects of discharges, to maintain or improve ambient air quality in the region, and to prevent increase on PM₁₀ from large-scale burning devices in Christchurch. The application is consistent with the policies of the Regional Plan.

Section 104(2A) – investment of the existing consent holder

This application is to replace an expiring consent, and is affected by s124 that allows the previous consent to continue in effect until this application is resolved. Therefore I must have regard to the value of the investment of the existing consent holder. The Applicant has assets worth \$50 million at this site, and has spent \$245,000 on the bag filtration system.

Section 104(3)(a) (ii) - consideration of effects on those who gave written approval

Riccarton High School via its Executive Officer has given written approval to this application. Under this section of the RMA I must not have regard to any effect on these persons. In this case, the School gave written approval but not the Ministry of Education, owner of the school site. The Ministry made a submission opposing the application.

Section 108 – Conditions

The conditions of consent proposed by the applicant and endorsed by the District health Board are largely satisfactory. However, as discussed in the hearing some minor amendments are required. The emissions of PM₁₀ and sulphur dioxide from the coal fired boiler are to be measured twice yearly for the next two years, to verify the predictions about the effectiveness of the bag filtration system and the concentration of sulphur dioxide in the discharge. The concentrations of contaminants in other discharges are to be measured within 6 months, and then every 5 years.

Section 123 - Duration

The Applicant is seeking a term of 20 years, and having had particular regard to the matters set out in NRRP Section 1.3.5, I have no reason to reduce the term sought.

Part 2 of the Act

I consider that, subject to the conditions proposed, the application is consistent with the sustainable management purpose, and Sections 5, 6, 7 and 8, of the RMA.

Decision

1. Having considered all of the relevant matters under Section 104 and Part 2, as discussed above, it is my decision that the application is granted for 20 years, subject to conditions.
2. The reasons for this decision are:
 - Adverse effects on the environment of the activity will be minor;
 - The activity will not breach the provisions of the National Environmental Standard for Air Quality (NESAQ) 2011;
 - The activity is in accord with the objectives and policies of the Regional Policy Statements, and the regional plans; and
 - The activity is consistent with Part 2 of the RMA.

Resource Consent

Duration

20 years

CONDITIONS

GENERAL

- <1> Discharges of contaminants into the air shall be only from the processes described in the application for this consent and associated with the manufacture of insulated copper and aluminium wire; including:
- a. Operation of a 2.75 megawatt coal fired boiler;
 - b. Operation of a 3.5 megawatt back-up diesel oil fired boiler;
 - c. Operation of diesel oil fired heaters not more than 760 kilowatts in total; and
 - d. Operation of liquefied petroleum gas-fired heaters not more than 66 kilowatts in total;
- from a factory located at 75-89 Main South Road, Riccarton, Christchurch, at or about map reference NZTopo50 BX24:6473-7944.
- <2> The discharges shall not cause particulate matter or odour that is objectionable or offensive beyond the boundary of the site.
- <3> The processes resulting in discharges into the air shall be operated and maintained using emission control mechanisms to achieve the emission standards stated in the conditions of this consent.

DISCHARGES FROM STACKS

- <4> The discharge into air from the coal-fired boiler shall occur via a stack at a height of at least 24 metres above ground level.
- <5> The discharge into air from the diesel oil-fired back-up boiler shall occur via a stack at a height of at least 20 metres above ground level. .
- <6> The discharge into air from the diesel oil-fired heaters shall occur via stacks at heights of at least 9.0 metres above ground level. .
- <7> The emissions from the following extruders and exhausts shall be discharged into the air via stacks at least at the following heights above ground level:
- | | |
|--|------------------|
| a) Mains Cable Factory Extruders | 12 metres |
| b) Construction Wiring Factory Extruders | 8 metres |
| c) Flexibles Factory Extruders | 8 metres |
| d) LAN Factory Extruders | 7 metres |
| e) Compounding Vents | 2.5 and 5 metres |

f) Scrubber/Cooler Exhausts	13 metres
g) Lead Extruder	12 metres
h) Tin Extruder	12 metres

<8> The discharges from the boilers and heaters shall be directed vertically into air and shall not be impeded by any obstruction above the stacks that decreases the vertical efflux velocity below that which would occur in the absence of such obstruction.

<9> The efflux velocity of the discharges from the top of the coal-fired boiler stack and the diesel-fired boiler stack shall be at least 10 metres per second when each boiler is operating at full capacity.

BURNING RATES

<10> The maximum coal burning rate in the coal-fired boiler shall be at an equivalent gross energy input of 13 gigajoules per hour. The maximum gross energy input during any 24-hour period shall not exceed 200 gigajoules.

<11> The maximum diesel oil burning rate in the diesel oil-fired back-up boiler shall not exceed 360 litres of oil per hour.

<12> The maximum combined diesel oil-burning rate in the diesel oil-fired heaters shall not exceed a total of 102 litres per hour.

<13> The combined liquefied petroleum gas burning rate in the gas-fired heaters shall not exceed six kilograms per hour.

EMISSION RATES AND QUALITY

<15> The discharge from the coal-fired boiler shall be via a bag filter or other emission control system capable of achieving a particulate matter concentration in the discharge of not more than 50 milligrams per cubic metre of air adjusted to zero degrees Celsius, 12 percent carbon dioxide on a dry gas basis.

<16> The discharge of sulphur dioxide from the boiler-stack shall not exceed:

- 4.8 kilograms per hour; and
- 77 kilograms per day;

when operating at maximum continuous rating or pro rata at a lesser operating condition. The sulphur dioxide discharge rate shall be calculated from the burning rate of the coal blend and the sulphur content of that coal blend provided by the supplier.

<17> Records shall be kept of the coal blend burned in the boiler, including:

- Average gross calorific value;
- Sulphur content by weight;
- The calculated maximum sulphur dioxide emission rate based on that information while allowing for sulphur retention in the ash; and
- The average daily rate of coal burning in kilograms per day, based on coal supply records.

These records shall be provided to the Canterbury Regional Council on request.

<18> The sulphur content of a representative sample of the diesel oil used in the diesel oil-fired boiler or diesel oil-fired heaters shall not exceed 0.006 percent sulphur by weight.

<19> The total mass emission rate of hydrogen chloride from the vents serving the PVC compounding area shall not exceed 14 grams per hour.

<20> The total mass emission rate from tin coating and lead extrusion processes shall not exceed:

- (a) 27 grams per hour of lead;
- (b) 46 grams per hour of zinc; or
- (c) 11 grams per hour of tin.

OPACITY

<21> The opacity of smoke emissions from the coal-fired boiler shall not be darker than Ringelmann Shade 1 as described in New Zealand Standard 5201:1973 except:

- a) In the case of a cold start for a period not exceeding 30 minutes in the first hour of operation; and
- b) For a period not exceeding a total of four minutes, in each succeeding hour of operation.

<22> The opacity of emissions from the chimney stacks from the diesel oil-fired back-up boiler, the diesel oil-fired heaters, and the gas-fired heaters shall not be darker than the Ringelmann Shade 1 as determined in accordance with the New Zealand Standard 5201:1973, except for a period not exceeding two minutes in each hour of operation.

EMISSIONS TESTING

<23> The concentration of contaminants in combustion gas discharged from the coal-fired boiler emission stack shall be measured as follows:

- (a) The concentration of total particulate matter shall be measured:
 - i. within three months of the date of commencement of this consent,
 - ii. within the period 1 August to 30 September 2013;
 - iii. within the period 1 March to 1 May 2014;
 - iv. within the period 1 August to 30 September 2014; and
 - v. thereafter at least once every year.
- (b) The concentration of sulphur dioxide shall be measured within six months of the date of commencement of this consent and thereafter at least once per year.

- (c) Measurements undertaken for condition 23 of this consent, shall occur when the boiler is operated at greater than 50 percent of the maximum continuous rating of the boiler.
- <24> The method of sampling and analysis for total particulate matter shall comply with ISO 9096:2003 and may include methods ASTM D3685M-98, AS 4323.2-1995, US EPA Method 5, US EPA Method 17, US EPA Method 201A, US EPA Method 202 or an equivalent method that complies with the fundamental sampling requirements of ISO 9096:2003.
- <25> Total particulate matter sampling and analysis results shall:
- (a) Include a description of the method used, the rate of fuel consumption during testing and any assumptions made; and
 - (b) Provide the mass emission rate in kilograms per hour particulate matter discharged.
- <26> The method of sampling and analysis for sulphur dioxide shall be USEPA Method 6, 6A, or 6C, or an equivalent method.
- <27> The sulphur dioxide sampling and analysis results shall:
- (a) Include a description of the method used, the rate of fuel consumption during testing and any assumptions made; and
 - (b) Provide the mass emission rate in kilograms per hour of sulphur dioxide discharged.
- <28> The emission rate of:
- (a) Hydrogen chloride discharged from the four vents in the PVC compounding area shall be measured within six months of the date of commencement of this consent and thereafter at least once every five years; and
 - (b) Lead, tin and zinc discharged from the vents serving the lead extrusion and tin coating processes shall be measured within six months of the date of commencement of this consent and thereafter at least once every five years.
- <29> Measurement, undertaken for condition 28 of this consent, shall occur when the associated process sources are operated at full capacity.
- <30> The methods of sampling, undertaken for condition 28 of this consent, shall be provided in writing to the Canterbury Regional Council prior to testing.
- <31> The results, obtained for condition 28 of this consent, shall provide the combined mass emission rate in grams per hour of the specified contaminants.
- <32> All test results shall be provided to the Canterbury Regional Council within two months of the date of testing.
- <33> Testing and analysis of samples, as appropriate, shall be carried out by an organisation and laboratory accredited by International Accreditation New Zealand (IANZ) for the tests and analyses involved.

MAINTENANCE AND MANAGEMENT

- <34> The coal-fired boiler, diesel oil-fired back-up boiler, and the diesel oil-fired heaters shall be maintained at least once every year, by a person competent in the maintenance of such appliances. This maintenance shall include: ash removal; adjustment if necessary of the fuel to air ratio to ensure compliance with conditions of this consent; and testing of the ratio of combustion gases discharged, i.e., carbon monoxide, carbon dioxide and oxygen. Maintenance reports shall be prepared, retained and copies shall be provided to the Canterbury Regional Council on request.
- <35> In the event of an accidental spillage of any chemicals resulting in the escape of a contaminant to the external atmosphere, the consent holder shall ensure that the most recent version of the MM Cables NZ Ltd "Spill Clean Up Procedure" is followed. The most recent version of this procedure shall be forwarded to the Canterbury Regional Council.
- <36> A Management Plan for the operation and maintenance of processes resulting in discharges to air and emission control equipment shall be provided to the Canterbury Regional Council within three months of the date of commencement of this consent.
- <37> The Management Plan shall include all measures necessary to achieve compliance with the conditions of this consent, including (but not limited to):
- (a) Day-to-day management requirements,
 - (b) Staff members responsible for ensuring consent compliance,
 - (c) Servicing and maintenance,
 - (d) Inspection and replacement of filters, and
 - (e) Contingency measures in the event of malfunction.
- <38> The Management Plan shall be held on-site and updated as necessary to ensure ongoing compliance. Updated copies of the plan shall be provided to the Canterbury Regional Council.

COMPLAINTS

- <39> A record of all complaints made to the consent holder relating to this consent shall be maintained and shall include:
- a) The date, time, location and nature of the complaint;
 - b) The name, phone number and address of the complainant, unless the complainant refused to supply these details;
 - c) Details of the complaint;
 - d) A description of the wind speed and direction and rainfall (if any) at the time of the incident that gave rise to the complaint;
 - e) The most likely cause of the complaint; and

f) Any remedial action taken by the consent holder.

<40> The record of complaints shall be provided to the Canterbury Regional Council upon request.

ADMINISTRATION

<41> The Canterbury Regional Council may, once per year, on any of the last five working days of April or October, serve notice of its intention to review the conditions of this consent for the purposes of:

- a) Dealing with any adverse effect on the environment which may arise from the exercise of this consent and which it is appropriate to deal with at a later stage; and/or
- b) Requiring the adoption of the best practicable option to remove or reduce any adverse effect on the environment; and/or
- c) Requiring monitoring in addition to, or instead of, that required by the consent; and/or
- d) requiring measures to reduce the impact of sulphur dioxide emissions from the coal-fired boiler in the event that there is a change to any national environmental standard (NES) or ambient air quality guideline set by the New Zealand Government or the Canterbury Regional Council that sets a guideline or standard for sulphur dioxide of less than or equal to $50\mu\text{g}/\text{m}^3$ (24 hour average).



Hearing Commissioner

18th February 2013

