

## Make Submission

|   |  |
|---|--|
| <b>Consultee</b>  | Mr Stuart Keer-Keer (62966)                                  |
| <b>Email Address</b>  | stuart@k2.co.nz  |
| <b>Address</b>  | PO Box 28147<br>Beckenham<br>Christchurch<br>8023            |
| <b>Event Name</b>   | Proposed Canterbury Air Regional Plan                        |
| <b>Submission by</b>  | Mr Stuart Keer-Keer  |
| <b>Submission ID</b>  | pCARP-936  |
| <b>Response Date</b>  | 1/05/15 7:46 AM  |
| <b>Consultation Point</b>                                       | 13 MANDATORY INFORMATION ( <a href="#">View</a> )            |
| <b>Status</b>   | Submitted  |
| <b>Submission Type</b>  | Web  |
| <b>Version</b>  | 0.2  |
| <b>To Be Heard</b>  |  |
| <b>Please select the appropriate option from the following:</b> | I DO NOT wish to be heard in support of my submission;<br>or |
| <b>If so</b>  |  |

## Make Submission

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| <b>Consultee</b>                    | Mr Stuart Keer-Keer (62966)                       |
| <b>Email Address</b>                | stuart@k2.co.nz                                   |
| <b>Address</b>                      | PO Box 28147<br>Beckenham<br>Christchurch<br>8023 |
| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-360   |
| <b>Response Date</b>                | 1/05/15 7:46 AM                                   |
| <b>Consultation Point</b>           | 7.16 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### **My submission is that:**

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Ambient air stations that determine if ECAN is meeting the national air quality standards measure total PM10. There is a need to align the discharges from source emissions with what is measured in ambient situations.

Models, Emissions Inventories and other planning work need accurate data to accurately predict what is happening in the air shed. If total is not reported then these are going to be based in incomplete data.

The particulate discharged will include condensable and filterable particulate. Without the word total not all of the discharge is considered.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Should read "the discharge into air of Total PM10".

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

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| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-362   |
| <b>Response Date</b>      | 1/05/15 7:53 AM                                   |
| <b>Consultation Point</b> | 7.15 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.1   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### My submission is that:

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

As per submission made for 7.16.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Add the word total - discharge into air of *total* PM 10

### Air Shed

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

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| <b>Address</b>                      | PO Box 28147<br>Beckenham<br>Christchurch<br>8023 |
| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-364   |
| <b>Response Date</b>                | 1/05/15 8:07 AM                                   |
| <b>Consultation Point</b>           | 7.20 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Diesel is listed by the International Agency for Research on Cancer (IARC) as a known carcinogen.  
[http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf)

The discharge of diesel from combustion sources is adding a known cancer causing agent to the air shed. This particulate is ultra fine typically less than 1µm in diameter, which has a significant health effect on people.

I have tested diesel discharges and found the discharge can be in excess of 200 mg/m<sup>3</sup>. Discharges to the air shed from these sources need to be managed so that this does not happen.

We require vehicles to have control over their discharge the same should apply to source discharges. They need to be managed so that the discharge is demonstrated to be minimal

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Discharges from any diesel source is not permitted but discretionary.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-365   |
| <b>Response Date</b>      | 1/05/15 8:15 AM                                   |
| <b>Consultation Point</b> | 7.26 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.1   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** .      Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Refer to 7.20 submission. The same reasons.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

A condition for this and for 7.20 needs to be added.

The discharge of total particulate from the emission stack is less than 25 mg/m<sup>3</sup> 12% CO<sub>2</sub> or 8% O<sub>2</sub> 0 degrees C 1 atm dry when under normal operating conditions. This needs to be demonstrated every 1000 hours of operation.



**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-366   |
| <b>Response Date</b>                | 1/05/15 8:30 AM                                   |
| <b>Consultation Point</b>           | 7.22 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

The combustion of wood will contain a high proportion of particulate that is PM2.5.

This particulate is condensable particulate. It is a major source of particulate in the air shed.

The International Agency for Research on Cancer IARC has listed outdoor particulate as a known carcinogen. <http://monographs.iarc.fr/ENG/Classification/ClassificationsAlphaOrder.pdf> (see outdoor particulate)

Need to be assessing the total discharge from stacks. The current wording only requires part of the discharge to be considered. The condensable particulate (gas at stack temperature but solid when it leaves the stack) can be 500% greater than the particulate measured under this condition.

Domestic wood fires require the condensable particulate to be measured.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Change the wording so that both fractions of the discharge are considered.

The concentration of *Total (Condensable and Filterable) PM 10*

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-367   |
| <b>Response Date</b>                | 1/05/15 8:40 AM                                   |
| <b>Consultation Point</b>           | 7.36 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Welding, soldering can discharge highly toxic contaminants. Welding of stainless steel can discharge Chrome VI (chrome six). The health risks of this were illustrated in the movie Erin Brocovich. Welding and soldering can discharge known carcinogens such as formaldehyde and ultra fine particulate.

There is a need to understand how much of toxic contaminants are being discharged and are they being controlled.

Schedule 6 does not require a set time for testing. A limit of 20 mg/m3 is very low so tests need to be run for at least 2 hours to get valid reading.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Add the following conditions.

1. The discharge must not contain any material that is known to be toxic or exceeds 1/20 of the New Zealand workplace exposure standard.
2. Testing for particulate must be at least 2 hours in duration.
3. Workplace atmospheres must be less than 20% of the New Zealand Workplace exposure standard. This is to ensure that fugitive emissions are also less than 20% of the workplace exposure standards.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-368   |
| <b>Response Date</b>      | 1/05/15 8:48 AM                                   |
| <b>Consultation Point</b> | 7.44 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.1   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### My submission is that:

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Odour from roasting coffee beans has an effect on areas around the discharge. The discharge also contains fine particulate as well as organics. The odour is sustained for long periods of time.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Put in a condition and or a rule so that the odour from coffee bean roasting does not affect neighbouring properties.

Put in a condition and or a rule so that the discharge of particulate from coffee bean roasting is controlled and demonstrated to be insignificant.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

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| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-369   |
| <b>Response Date</b>      | 1/05/15 8:56 AM                                   |
| <b>Consultation Point</b> | 7.46 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.1   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### My submission is that:

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Crystalline silica is a known carcinogen. Inhalation of crystalline silica can cause silicosis.

<http://www.nlm.nih.gov/medlineplus/ency/article/000134.htm>

<http://monographs.iarc.fr/ENG/Classification/ClassificationsAlphaOrder.pdf> refer silica crystalline.

Sand can contain up to 90% crystalline silica.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Add the following conditions



Discharge of crystalline silica is less than 1/10 of the New Zealand Worksafe exposure standard.

Any fugitive emissions of crystalline silica are less than 1/10 of the New Zealand Worksafe exposure standard.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-371   |
| <b>Response Date</b>                | 1/05/15 9:03 AM                                   |
| <b>Consultation Point</b>           | 7.50 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### **My submission is that:**

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

The fugitive emissions can contain volatile organics and particulate. If the paint booth or spray booth is not sealed these can affect surrounding properties. A check needs to be made to ensure the paint booth contains the toxic discharges.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### **I seek the following decisions from Environment Canterbury:**

Add the following conditions

The discharge of fugitive emissions needs to be controlled. The workplace air must be less than 0.2 of the New Zealand Workplace exposure standard for any volatile organic compound found in the paint.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-372   |
| <b>Response Date</b>                | 1/05/15 9:13 AM                                   |
| <b>Consultation Point</b>           | 7.52 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### **My submission is that:**

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Workplace exposure standards are managed by Worksafe New Zealand. These can be updated on a regular basis. Need to align with the current standards.

Workplace standards are designed for a person exposed to a hazard for 8 hours a day. For environmental situations the exposure can be 24 hours a day.

An exposure standard represents an airborne concentration of a particular substance in the workers breathing zone, exposure to which, according to current knowledge, should not cause adverse health effects nor cause undue discomfort to nearly all workers.

Compliance with the designated value does not, however, guarantee protection from discomfort or possible ill-health outcomes for all workers.

The range of individual susceptibility is wide and it is possible that workers will:-

- 1 experience discomfort or
- 2 develop occupational illness

from exposure to substances at levels below the exposure standards.

AWES-TWA is an 8 hour time weighted average exposure standard designed to protect the worker from the effects of long-term exposure.

It is good occupational hygiene practice to reduce the levels of airborne contaminants when the exposure level is greater than 20% of the recommended standard. This minimises the risk of exceeding the guidance level, due to variations in work activities, seasonal and weather activities.

Keeping the workplace to less than 20 % of the standard will better protect the workers and ensure that fugitive emissions are not going to have an effect on neighbouring properties that are exposed to toxins 24 hours a day.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Condition 2.

Change to Worksafe New Zealand

Change Work Exposure Standards 2013 to the current New Zealand Work Exposure standards or where one does not exist NIOSH standards or other recognised international agency.

Change compliance to less than equal to 0.2 of the exposure standard.

**Air Shed**

**Which Air Shed does this submission relate to or none**

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**Tick relevant topics**

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>                | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>                | pCARP-373   |
| <b>Response Date</b>                | 1/05/15 9:16 AM                                   |
| <b>Consultation Point</b>           | 7.59 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>                       | Submitted   |
| <b>Submission Type</b>              | Web   |
| <b>Version</b>                      | 0.1   |
| <b>Support Oppose</b>               |   |
| Supports in Part or Opposes in Part |   |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### **My submission is that:**

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

**Pyrolysis of tyres is a growing industry in New Zealand. The discharges have the potential to discharge a cocktail of toxic compounds.**

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### **I seek the following decisions from Environment Canterbury:**

Add Pyrolysis of tyres to the list.

### **Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan  |
| <b>Submission by</b>      | Mr Stuart Keer-Keer  |
| <b>Submission ID</b>      | pCARP-374  |
| <b>Response Date</b>      | 1/05/15 9:23 AM  |
| <b>Consultation Point</b> | Schedule 2: Assessment of offensive and objectionable effects ( <a href="#">View</a> ) |
| <b>Status</b>             | Submitted  |
| <b>Submission Type</b>    | Web  |
| <b>Version</b>            | 0.1  |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

### My submission is that:

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Odour Scout – Odour Detection

An Odour Scout is somebody with a calibrated nose who undertakes a field survey. Sometimes known as a nasal ranger. To do this work the odour scout must have a calibrated nose.

What does an Odor Scout Do?

#### The odor scout will determine the:

- 1 Smell intensity
- 2 Characteristics from a source – for example could be meaty, cooked vegetable, paint



- 3 Duration of the odor
- 4 Weather and map data

This method is based on a European standard VDI 3883. Included in this method is the process of getting a person's nose calibrated. At each point along the course the person will determine the odour, typically along a boundary of a property.

The odor ranger may also patrol the boundary of a plant or source.

**Odour Rating:**

The odour rating determines if the odour is annoying and relates it to how persistent the odour is.

Reference [www.k2.co.nz](http://www.k2.co.nz)

Odour scouts are a means to independently assess odours and report on them.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Add to the List of tools

Reports from independent odour scouts. Odour scouts must have a calibrated nose.

Add Odour Scouts to table 8.2.1

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

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| <b>Event Name</b>                   | Proposed Canterbury Air Regional Plan  |
| <b>Submission by</b>                | Mr Stuart Keer-Keer  |
| <b>Submission ID</b>                | pCARP-375  |
| <b>Response Date</b>                | 1/05/15 9:40 AM  |
| <b>Consultation Point</b>           | Schedule 6: Testing for particulate matter in exhaust gases ( <a href="#">View</a> ) |
| <b>Status</b>                       | Submitted  |
| <b>Submission Type</b>              | Web  |
| <b>Version</b>                      | 0.1  |
| <b>Support Oppose</b>               |  |
| Supports in Part or Opposes in Part |  |

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**

- . Support
- . Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

Support the addition of condensable particulate for 5Mw. Need to have this for the discharges of 2MW or less.

This can be a high proportion of the discharge. Determining what is in the discharge will enable better management of the discharge and lead to improvements of the air shed.

Air pollution is listed as a known carcinogen. The condensable particulate is typically all less than 1µm in size. The smaller the particule size the greater the health effects. By not controlling this particulate we are not controlling the most toxic components discharge to the air shed.

There are systems in New Zealand where this particulate is removed from the discharge and heat recovered from the discharge.

Not measuring this component leads industry to the perception that particulate from a boiler can be removed by a baghouse. The baghouse will not remove the condensable particulate. Industry can spend high sums of money on emission control equipment that does not remove all the particulate.

Other regional councils (Otago) have this requirement to determine condensable particulate on discharges.

The most toxic part of the particulate will not be removed.

It is a requirement that the condensable particulate fraction be determined and controlled on other sources such as domestic fires.

Please also refer to other submissions such as 7.21

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Require Condensable particulate be determined for all combustion sources.

**Air Shed**

**Which Air Shed does this submission relate to or none**

**Choose one of the following three**

**Tick relevant topics**

## Make Submission

|                           |   |
|---------------------------|---|
| <b>Consultee</b>          | Mr Stuart Keer-Keer (62966)                       |
| <b>Email Address</b>      | stuart@k2.co.nz                                   |
| <b>Address</b>            | PO Box 28147<br>Beckenham<br>Christchurch<br>8023 |
| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-1905  |
| <b>Response Date</b>      | 1/05/15 8:15 AM                                   |
| <b>Consultation Point</b> | 7.20 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.4   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** .  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Refer to 7.20 submission. The same reasons.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

A condition for this and for 7.20 needs to be added.

The discharge of total particulate from the emission stack is less than 25 mg/m<sup>3</sup> 12% CO<sub>2</sub> or 8% O<sub>2</sub> 0 degrees C 1 atm dry when under normal operating conditions. This needs to be demonstrated every 1000 hours of operation.

*Please summarise decision requested*

**Planner - Summary of Decision Requested**

Insert the following Condition to Rule 7.20:

The discharge of total particulate from the emission stack is less than 25 µg/m<sup>3</sup> 12% CO<sub>2</sub> or 8% O<sub>2</sub> degrees C 1 atm dry when under normal operating conditions. This needs to be demonstrated every 1000 hours of operation.

**Air Shed**

**Which Air Shed does this submission relate to or none** . Not Air Shed Related

**Choose one of the following three** . Recommend Accept in Part

**Tick relevant topics**

## Make Submission

|                           |   |
|---------------------------|---|
| <b>Consultee</b>          | Mr Stuart Keer-Keer (62966)                       |
| <b>Email Address</b>      | stuart@k2.co.nz                                   |
| <b>Address</b>            | PO Box 28147<br>Beckenham<br>Christchurch<br>8023 |
| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan             |
| <b>Submission by</b>      | Mr Stuart Keer-Keer                               |
| <b>Submission ID</b>      | pCARP-1912  |
| <b>Response Date</b>      | 1/05/15 8:48 AM                                   |
| <b>Consultation Point</b> | 7.44 Paragraph ( <a href="#">View</a> )           |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.3   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:**  Support  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Odour from roasting coffee beans has an effect on areas around the discharge. The discharge also contains fine particulate as well as organics. The odour is sustained for long periods of time.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

### I seek the following decisions from Environment Canterbury:

Put in a condition and or a rule so that the odour from coffee bean roasting does not affect neighbouring properties.

Put in a condition and or a rule so that the discharge of particulate from coffee bean roasting is controlled and demonstrated to be insignificant.

*Please summarise decision requested*

**Planner - Summary of Decision Requested**

Insert an additional condition or rule to control the discharge of particulate from coffee bean roasting, and to require the effect to be demonstrated as insignificant if it is a permitted activity.

**Air Shed**

**Which Air Shed does this submission relate to or none** . Not Air Shed Related

**Choose one of the following three** . Recommend Accept in Part

**Tick relevant topics**

## Make Submission

|                           |   |
|---------------------------|---|
| <b>Consultee</b>          | Mr Stuart Keer-Keer (62966)   |
| <b>Email Address</b>      | stuart@k2.co.nz   |
| <b>Address</b>            | PO Box 28147<br>Beckenham<br>Christchurch<br>8023   |
| <b>Event Name</b>         | Proposed Canterbury Air Regional Plan   |
| <b>Submission by</b>      | Mr Stuart Keer-Keer   |
| <b>Submission ID</b>      | pCARP-1961  |
| <b>Response Date</b>      | 1/05/15 9:23 AM   |
| <b>Consultation Point</b> | Table 8.2.1 Odour Effects Assessment Tools – Existing Activities ( <a href="#">View</a> ) |
| <b>Status</b>             | Submitted   |
| <b>Submission Type</b>    | Web   |
| <b>Version</b>            | 0.2   |

### Support Oppose

Supports in Part or Opposes in Part

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** .  Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Odour Scout – Odour Detection

An Odour Scout is somebody with a calibrated nose who undertakes a field survey. Sometimes known as a nasal ranger. To do this work the odour scout must have a calibrated nose.

What does an Odor Scout Do?

**The odor scout will determine the:**

- 1 Smell intensity
- 2 Characteristics from a source – for example could be meaty, cooked vegetable, paint



- 3 Duration of the odor
- 4 Weather and map data

This method is based on a European standard VDI 3883. Included in this method is the process of getting a person's nose calibrated. At each point along the course the person will determine the odour, typically along a boundary of a property.

The odor ranger may also patrol the boundary of a plant or source.

**Odour Rating:**

The odour rating determines if the odour is annoying and relates it to how persistent the odour is.

Reference [www.k2.co.nz](http://www.k2.co.nz)

Odour scouts are a means to independently assess odours and report on them.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Add to the List of tools

Reports from independent odour scouts. Odour scouts must have a calibrated nose.

Add Odour Scouts to table 8.2.1

*Please summarise decision requested*

**Planner - Summary of Decision Requested**

Amend Table 8.2.1 to include "Odour Scouts".

**Air Shed**

**Which Air Shed does this submission relate to or none** . Not Air Shed Related

**Choose one of the following three** . Recommend Accept in Part

**Tick relevant topics**