

Tabled att Hearing

27.10.2015
V Sully.

Kaikoura Paper Plus

From: vincentbernardscully
Sent: Tuesday, 27 October 2015 08:24
To: kaikoura@paperplus.co.nz
Subject: Please print 10 copies pleases ... Fwd: Notes on submission

Begin forwarded message:

From: vincentbernardscully <vincentbernardscully@hotmail.com>
Subject: Re: Notes on submission
Date: 27 October 2015 7:34:24 NZDT
To: vincentbernardscully@hotmail.com

On 27/10/2015, at 6:55, vincentbernardscully <vincentbernardscully@hotmail.com> wrote:

On 26/10/2015, at 11:08, vincentbernardscully <vincentbernardscully@hotmail.com> wrote:

On 26/10/2015, at 9:54, vincentbernardscully <vincentbernardscully@hotmail.com> wrote:

INTRODUCTION:

My wife and I live at 90 Mill Road, developing the primary industries of land based aquaculture, and poultry. We are offering farm tours of our activities, farming presently native fresh water crayfish, and with permissions and intentions of farming other fish species. And more recently, poultry for eggs, being hens, also duck and soon quail. Our fish farm is of modern industry standards, having employing a successful crayfish farmer from Western Australia.

We keep tame goats and pigs as property maintenance officers. Also employ two part time, for farm husbandry and tidiness. I work at sea as a ship's master, and plan to retire into our home based business, which trades as a registered company: Waikoura Springs Ltd.

I intend writing about our journey, with a working title: Crayfish for lunch. I have one book published, Poles Apart with Northanger, which is in the library service.

My reason for writing a submission and to be notified, was suggested to me by ECan Commissioner on Air, Mr David Bedford. He had previously visited me regarding my previous complaints of incinerations and a home based spray painting business of my next neighbour to the east, Mr Anthony Muir, at 84 Mill Road. His spray booth is about 10 m from his property boundary. There is a driveway between our properties. Therefore Mr Muirs activity is approx 50 m upwind from our activity.

<IMG_3324.jpeg>

Both neighbouring properties were bought from a retiring farming subdividing his land, at approximately the same time. Our property has changed hands. We bought this property with the intention of taking over the business of developing a crayfish farm from the estate of the previous owner

I have made a considerable number of complaints on air pollution over the last ten years to ECan. I have also had numerous robust discussions with ECan to engage any effective response.

I admit some progress has been made on how Mr Muir and household incinerates rubbish and the impact onto us his spray painting business onto us. I make the point, please, that what progress has been made, had generally been outside the rules of the current air plan.

However I refer you, please, to two of my recent complaints to you, to ECan, being 29th September and 22 October 2015.

Kevin Heays
ECan Manager
Kaikoura
29th September

Please advise Ecan pollution of this

At 1100 today, seeing off a farm visitor at the gate, (CCeS on this) we could both smell unmitigated unpleasant paint fumes stemming from Tony Muir's spray painting activity next door

Any assistance to improve mitigation of air pollution appreciated

Vince Scully
90 Mill Road
Kaikoura

Three air pollution complaints to pass onto ECan Pollution please

Good morning Kevin

Appreciate if you pass on the following to ECan Pollution please

1/. Smelt solvents 1800 hours 20th August from our gate. I presume Tony Muir was cleaning his spray guns to atmosphere after a day's activity i.e. in a manner which was not best practices.

2/. 1300 - 1400 hours Wednesday 21st August. Smelt presumably isocyanate paint fumes. I presume that this Mr Muir was spray painting within his booth. I question whether his spray booth extraction process is working correctly, as I was feeling light headed, and left a taste on my tongue. I suspect that Mr Muir's spray booth does not project vertically as required under his operating rules.

3/. 1630 hours Wednesday 21st August. My wife and I were working around our adjacent pond and were subject to unacceptable paint fume odour. I am presuming that Mr Muir had completed his spray painting activity in his booth was now venting his booth to atmosphere. If so, this also is not a best practice.

I would like to remind you that we are advertising and undertaking farm tours. Participants will be subject to this "horrible" odour. Horrible is not an emotive word. Isocyanate paint fumes are a health hazard. If I was running a farm tour which was subject to either 2/. or 3/. I would be obliged to cancel the farm tour and refund customers, as this is not acceptable.

Please refer to separate photo of tanks with covers, and top pond. I am setting up for our breeding season. I am about to put our berried female crayfish into these tanks. Water temperature is critical for the success of their hatchlings. Therefore I am operating these tanks by pumping cooler ground water into them, which is

being discharged into our top pond, which is being discharged into Lyell Creek. Therefore my complaint of Mr Muir not operating under best practices, is affecting ourselves, the visiting public, and also is occurring 50 metres from a catchment of Lyell Creek.

All the above occurred in light prevailing sea breeze conditions. When the sea breeze is stronger, the odour from the extraction of Mr Muir's spray booth is acceptable. i.e. without wind assisted dispersal, I question whether it achieves its intended effects.

Yours faithfully

Vince Scully
90 Mill Road
Kaikoura 7300
03 319 5953

Comments on these two complaints

There is no mitigation of Mr Muirs spray painting activity onto us. I suggest an effective fence as a solid barrier to mitigate is important

There is nothing in the current air plan to deter discharging to atmosphere, an air spray gun with solvents, for cleaning purposes, to atmosphere. This is in the best practices advice, with Dept of Labour. Suggest that these are added to the Air Plan

Mr Muirs spray booth extraction has an acceptable effect on us when dispersal is wind assisted. Therefore it is not effective. He is presumably isocyanate based paints, which are managed with particular care because of their harmful effects listed in their MSDS. However there are ineffective controls to us as third party. I ask that extraction processes from paint booths be reviewed to consider this. There is no requirement for a minimum velocity of extraction from a booth.

Mr Muirs spray booth door faces east. Therefore when he opens his doors, and his spray booth has not had a complete air change, as I believe it hadn't, we get immersed in a potentially hazardous batch of displaced air.

I make the point that Mr Muirs spray painting activity is presently causing harm to us.

I am of the viewpoint that two neighbours with a conflict of interest can coexist in peace if rules were set to monitor mitigation onto each other.

I believe that we are not their yet after ten years.

There has been a cost on me having to make these complaints. Also on rate payers for ECan's officers time.

This issue has also created a faction with the community taking sides. We live with effectively being sent to Coventry by Mr Muir and his alliance, which is the old school in a small town, where indeed we have done nothing wrong.

pCARP 7.10 burning of paper 100 m upwind.

Management buffer zone of 100m does not account for thermals

PM 10s not managed

A drum being a burning receptacle is not a responsible incinerator 100 m from a boundary. I suggest this activity is no longer an acceptable permitted practice.

pCARP 7.48

I am suggesting an effective fence is required to mitigate spray painting activity onto neighbours. Mr Muir has set up a spray booth in close proximity of our property, immediately upwind of us, in the prevailing light sea breezes.

And the odour and potential harm under present air plan rulings, is not acceptable.

6/. Wear PPE. It is - in the hierarchy of control of risk assessments - the recognised last preventative precaution, or step, to prevent harm to an operator

7/. If ECan can ask me to padlock my shed which contains DGs i.e. minimal paint for private use, then ECan can ask operators to wear PPE

p CARP 7.49

Possibility of erecting temporary shields so as to prevent hazards to third parties

pCARP 7.50

C2; Have had experiences of incomplete spray booth exchanges of air and when opening door, we smell a large waft as air is displaced from the booth by incoming fresh air.

5. The discharge is directed vertically into the air ... I stated doubt in my submission as to whether my neighbours stack was unrestricted as required, due to debris from entering his spray booth down his chimney. I think I am incorrect. I think the issue is that there is not a required velocity flow rate of discharge emission. There is nothing to stop the operator from adjusting a potentiometer to wind back the flow rate to save cost.

