

 You replied to this message on 14/06/2016 11:43 a.m..

From: Paul Dahl
To: Suzanne Blyth
Cc: Stout, Isobel
Subject: Penley application asbestos disposal ECAN

Further to my advice re HSNO not covering asbestos.

WorksafeNZ and WEMT in our CCC/ECAN role have no extra concern for asbestos risk than normal for the proposed activities in this application.

The controls in place at the site of the source of the contaminated land , (Colwyn Ave) are actively monitored as will the loading , handling and unloading phases where the likely discharges could occur. The prompt removal the material from this residential site will lessen existing risk to human health.

The essence of success for this application, if approved, is strict Monitoring and compliance. This is covered in legislation and the proposed conditions.

The transport has some risk from crashes on route, either with other traffic or on the farm tracks. The risk is low.

- • Upgrade and improvements of the farm track as essential to safely transport across the farm. The result with an improvement for the farm and provide longer term control measures from sediment generation and accumulations in the natural surface water drainage paths being traversed by the existing track.
- • Controls for transporting this material is not clearly prescribed by road controlling agencies however NZ Police (CVIU) with Worksafe NZ and WEMT have evolved a simple best practice that are included in the CMP level document and confirmed as a an authorisation condition. This is the bagging , placarding and weigh bill which have been included. No other controls or conditions would be justified.
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- • In the case of an incident resulting in a discharge, the subsequent investigation by the agencies would determine the appropriate compliance /enforcement action based on the evidence.

The proposed increased size of the current cell does not increase the risk from future discharges. I say this due to the siting adjacent to the small knoll and the significant ridge that is traversed south off Kennedys bush road. The engineering detail is thorough. The design and supervision of the previous encapsulation by the same owner and consultant provides a level of confidence .

There are no compliance concerns for asbestos risk that cannot be covered in legislation or the proposed conditions.

Cheers
Paul Dahl
WEMT

Paul Dahl

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