

Before the Independent Commissioner

Under the Resource Management Act 1991

In the matter of an application under s.88 for resource consent for discharges of contaminants to air from a poultry processing plant

Supplementary Statement of Evidence of Jason Savelio Karena Pene

12 August 2020

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Introduction

- 1 My name is Jason Savelio Karena Pene.
- 2 I have prepared a statement of evidence dated 28 July 2020. My qualifications and experience are set out in that statement.
- 3 I have read the evidence of Paul Whyte on behalf of the Ministry of Education.
- 4 This statement addresses the following matters raised in Mr Whyte's evidence:
 - (a) The proposed minimum biofilter odour removal efficiency limit and alternative means of monitoring odour control performance

Proposed odour removal efficiency limit and alternative monitoring measures

- 1 Mr Whyte suggests the following consent condition at paragraph 17:

"The biofilter shall be designed and operated to achieve an odour removal efficiency of at least 95%. The odour removal efficiency shall be measured within three months of the consent being granted and every two years thereafter."

"If the biofilter does not achieve an odour removal efficiency of at least 95%, the consent holder shall provide the consent authority with a report describing the modifications necessary to make the biofilter compliant with at least 95% odour removal efficiency. Following any modifications to the biofilter, the odour removal efficiency shall be tested within three months of the modifications being made and the results reported to the consent authority."
- 2 I agree that it is good environmental management practice to monitor performance of environmental controls against measurable assessment criteria, where practicable. However, I disagree that the specification of a minimum odour removal efficiency limit would provide for effective environmental management in this instance.
- 3 As noted in Appendix E of my statement of evidence in chief, provided the biofilter is appropriately designed, operated and maintained, rendering type odour extracted from the Protein Recovery Plant (PRP) should be broken down and that only a residual low intensity earthy-type odour is likely to be discharged. The presence of residual earthy odour would decrease the measured treatment efficiency referred to in Mr Whyte's proposed condition. Despite this, given the less offensive hedonic tone of treated biofilter odour relative to untreated rendering-type odour, the residual discharge of treated odour from the biofilter would not necessarily increase the potential for off-site nuisance effects,.

- 4 I therefore consider that a more relevant assessment criteria for biofilter performance is the degree of removal of rendering-type odour and that removal of detectable odour of this nature should effectively be complete.
- 5 I therefore consider that the proposed alternative to Mr Whyte's suggested consent condition, recommended to Tegel by Roger Cudmore and set out in proposed condition 19(h) of the updated set of conditions appended to legal submissions, would provide a more effects means to of monitoring and measuring biofilter odour treatment performance.
- 6 Additionally, the treatment of odour provided by the biofilter, to which Mr Whyte's proposed condition relates, is only one component of the regime used by Tegel to control and manage odour from the rendering plant. As described in paragraphs 62 to 66 of my evidence in chief, this management regime also includes the following important components:
 - (a) Minimisation of odour generation at source through control of the quality of raw material used for rendering; and
 - (b) Capture and containment of odour remissions from the rendering process through enclosure and extraction of process units and the PRP building.
- 7 The odour removal efficiency limit proposed by Mr Whyte would not provide a means of measuring the performance of either 6(a) or 6(b) above or the overall performance of the management regime.
- 8 A more effective means of monitoring of the overall performance of the odour management regime is already contained in proposed conditions 23 to 26.
- 9 These conditions set out requirements for regular site boundary odour assessments, which would take account of odour from all of the odour sources at the PRP and other parts of site rather from the biofilter specifically. As a result, the boundary assessment regime set out in conditions 23 to 26 would more effectively monitor the performance of the overall odour management regime employed at the site.

Conclusion

- 10 In relation to Mr Whyte's proposed minimum biofilter odour removal efficiency limit I consider that the proposed alternative condition 19(h) would provide a more effective means of monitoring biofilter treatment performance.

11 Additionally, I consider that the site boundary odour assessment regime already provided for within the draft consent conditions would provide more effective monitoring of the performance of odour management at the site overall.

Jason Pene

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