

17 February 2014

Total Bridge Services
PO Box 56416
Dominion Road, Auckland 1146

Attention: Gerry McAndrew

Dear Gerry

COMPLIANCE MONITORING

Resource Consent Details:

Consent Number: 38519
Consent Holder: NZ Transport Agency
Activity Type: Discharge to Air
Location: Auckland Harbour Bridge (AHB)
Waitemata Harbour Auckland

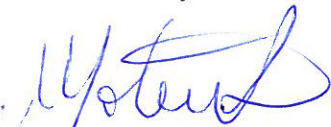
File Ref 22146

Your site was visited 27 November 2013 to assess compliance with the relevant conditions of your Air Discharge Consent, number 38519. Thank you for the assistance provided during the visit, it was much appreciated.

You are advised that your site was in full compliance (Category 1) with the relevant conditions of the air discharge consent.

A copy of the compliance inspection report is enclosed. If you have any queries regarding the contents of this letter or any related matter, please do not hesitate to contact me on **s9(2)(a)** or marijana.jovanovic@aucklandcouncil.govt.nz.

Yours sincerely



Marijana Jovanovic
Air Quality Consents and Compliance Advisor
Natural Resources and Specialist Input Unit
Auckland Council

COMPLIANCE MONITORING SITE INSPECTION SHEET

Inspection Details:

File Ref: 22146

Consent Number:	38519									
Consent Holder:	NZ Transport Agency Attn: Tammy Muharemi									
Location:	Auckland Harbour Bridge (AHB) Waitemata Harbour Auckland									
Activity Type:	Discharge To Air									
Works Description:										
Expiry Date:	30 August 2036									
Type	Scheduled Date	Actual Inspection Date				Time On-site				
Routine	31 October 2013	27 November 2013				1.5 h				
Contact Name	Gerry McAndrew	Position				Health & Safety Manager				
Inspected By	Action Taken	Inspection Compliance Rating								
Marijana Jovanovic	Letter	NI	NE	1	2	2A	2B	2C	3	4

Summary:

While approaching the site Marijana Jovanovic (MJ) could not notice the discernable odour or visible emissions beyond the boundary of the Henkel site. The weather was overcast with occasional showers. At the site MJ met with Gerry McAndrew (GM), Health & Safety Manager for Total Bridge Services, Jon Patman (JP), Alliance Manager for Total Bridge Services and Kathryn McDonald (KM) from Opus International Consultants.

JP explained that management of the Harbour Bridge has been changed from Total Bridge Services to Auckland Harbour Bridge Alliance (AHA). Alliance is made of: NZ Transport Agency, Total Bridge Services and BECA. JP and KM led discussion on clarification about maximum annual discharges of garnet from dry/wet discharges, as defined by AEE and report for the current consent. Question was raised whether the garnet discharges must be proportional to the wet/dry ratios for each area or can be treated as maximum allowable discharges per annum for that type of blasting irrespective of the quantities. Response to this inquiry will be provided in separate letter.

All relevant records and logs were checked. It was noted that no complaints were received since this consent was issued; however there are provisions set in place to record and monitor air quality complaints.

After discussing the compliance with consent conditions a site walkover over the part of the bridge was undertaken.

Inspection Items:

Inspection Item	Cond No.	Comp. rating	Comment
3. Access to the relevant parts of the AHB shall be available at all reasonable times to enable the servants or agents of the Auckland Council to carry out inspections, surveys, investigations, tests, measurements or take samples whilst adhering to the Consent Holder's health and safety policy (see advice note number 4).	3	1	Full access was granted.
4. The activities granted under these consents shall be operated in accordance with the documentation submitted to the Auckland Council as part of applications numbered 38519, 38835 and 38836, where not amended by the conditions of this resource consent. No alterations shall be made to the plant or processes that do not, or are not likely to, comply with the provisions of this consent, a regional rule or regulations under the Resource Management Act 1991.	4	1	There have been no changes to the plant or an operation since this consent was issued. However, It was decided that containment will not be implemented. AHA will apply for the change of conditions of air discharge and other consents.
7. The Consent Holder shall notify the Harbourmaster's Office in writing 10 (ten) working days prior to commencing any maintenance works within the main navigation span of the AHB specifying the duration, nature and location of works. The consent holder shall advise the Harbourmasters Office a minimum of 24 hours prior to any change in works duration, nature or location.	7	1	This procedure is followed as required.
9. The Consent Holder shall implement the following containment works: a) Pre-Containment Phase: Year 0 to 3, 30 August 2011 to 30 August 2014. 'Pre-Containment' means the maintenance works that will be carried out prior to the deployment of the proposed containment systems (including any structures); b) Partial Containment Phase: Year 3 to Year 10, Partial Containment to be in place by 30 August 2014. 'Partial Containment' shall be considered to be a method which controls and collects: <ul style="list-style-type: none"> • 85% of the mass of all dry discharges and spray paint generated during maintenance works; and • 100% of the mass of washwater used for treatment before discharge other than in Zone B, the 'Lower Overarch' (as specified on 'Figure 1 – Proposed Zones for Encapsulation') which has 100% discharge of 	9	1	Due to high cost of the Containment plan AHA have investigated other alternative coatings and management approaches. New approach that includes Revised Coating and Practice Programme has been developed. This programme has included spot repair (blasting) method rather than full overcoat and increase of the water blasting as surface preparation which is likely to result in decreased level of contaminants discharged (including Zn). It was decided that containment will not be implemented. AHA will apply for the change of conditions of air discharge and other consents. Compliance with First pre-containment phase (30 August 2011 to 30 August 2014) would be achieved by making sure that



<p>all contaminants; and shall be deployed in the areas north of Pier 1 and south of Pier 5;</p> <p>c) Full Containment Phase: Year 10+, Full Containment to be in place by 30 August 2021. 'Full Containment' shall be considered to be a method which controls and collects:</p> <ul style="list-style-type: none"> • 85% of the mass of all dry discharges and spray paint generated during maintenance works; and • 100% of the mass of washwater used for treatment before discharge other than in Zone B, the 'Lower Overarch' (as specified on 'Figure 1 – Proposed Zones for Encapsulation') which has 100% discharge of all contaminants; <p>and shall be deployed in the area defined as 'partial containment' and the area between Pier 1 and Pier 5 (over the CMA).</p>			<p>coatings in the area of the bridge that require containment after 30 August 2014 will be in good condition by this date and will not require maintenance. It was estimated that after maintenance this area will not need repainting until 2019.</p>
<p>10. During the Pre-Containment phase, the maximum discharge mass from bridge maintenance activities shall not exceed 95.5 tonnes per annum of contaminants, comprised of 92 tonnes of garnet sand per annum and 3.5 tonnes per annum of paint associated with the maintenance activities of the AHB.</p>	10	1	<p>Monthly log maintained to keep records of discharged contaminants from used garnet and paint.</p>
<p>14. The consents shall be implemented in accordance with the EMP. Where there is conflict between the consent conditions and the EMP, the consent condition shall prevail unless alternative agreement is reached between the Consent Holder and the Major Infrastructure Team Manager.</p>	14	1	<p>EMP in place and followed in day to day duties and compliance with consent conditions.</p> <p>New changes of the consent conditions would be applied for as per comment under condition 4 and 9.</p>
<p>27. The Consent Holder shall use garnet sand as the abrasive medium when undertaking dry abrasive blasting as identified in the material safety data sheet provided in the application documentation unless otherwise approved by the Major Infrastructure Team Manager. (Appendix 6 of section 92 response from NZTA dated 29 March 2011).</p>	27	1	<p>Only garnet sand used as abrasive medium as provided by the application for this consent.</p>
<p>28. The Consent Holder shall use garnet sand (containing no more than 5% dry weight free silica) as the abrasive medium when undertaking dry abrasive blasting.</p>	28	1	<p>Only garnet sand containing, no more than 5% dry weight free silica, has been used.</p>
<p>29. All processes on site shall be operated, maintained, supervised, monitored and controlled to ensure that emissions authorised by this consent are maintained at</p>	29	1	<p>A Management Plan is in place for all activities on site, with a strong focus on avoiding potential effects, particularly relating to health and</p>

the minimum practicable level.			safety, but also air discharges.
30. Beyond the boundary of the site, there shall be no dust or odour caused by discharges from the site, which in the opinion of an enforcement officer, is noxious, offensive or objectionable.	30	1	There was no odour or dust caused by discharges to air from the site that were noxious, dangerous, offensive or objectionable, beyond the site boundary.
31. No discharges from any activity on site shall give rise to visible emissions, other than water vapour and clean steam, to an extent which, in the opinion of an enforcement officer, is noxious, dangerous, offensive or objectionable.	31	1	No visible emissions were noted at the site or beyond its boundaries.
32. Beyond the boundary of the site, there shall be no discharges to air of any hazardous air pollutant, caused by discharges from the site, which is present at a concentration that causes, or is likely to cause adverse effects to human health, the environment or property.	32	NI	No hazardous air pollutant monitoring was undertaken beyond the site boundary during the visit.
33. That no dry abrasive blasting shall be undertaken when wind speeds are greater than 7 m/s, averaged over 5 minutes, or when: a) undertaking maintenance work north of Pier 1 when the wind is from the southwest or southeast quarters; or b) undertaking maintenance work south of Pier 5 when the wind is from the northwest quarter.	33	1	Wind data are checked at 9 am and 11am every day. Abrasive blasting is not undertaken when wind speeds are greater than 7 m/s, averaged over 5 minutes and North of Pier 1 or south of Pier 5.
34. That, in order to minimise the drift of blast debris and paint spray, suitable screens shall be used at all times when undertaking dry abrasive blasting and/or spray painting of the AHB and extensions north of Pier 1 and south of Pier 5.	34	1	Appropriate screens have been used during dry abrasive blasting and spray painting, north of Pier 1 and south of Pier 5. Photos of the screens viewed.
35. That the Consent Holder shall provide residences and businesses within 200 metres of any blasting or painting with a quarterly update of the proposed schedule of work for the upcoming quarterly period. The information shall include details of how to contact NZTA (including a phone number) if they consider themselves to be affected by dust from the scheduled works.	35	1	The consent holder always updates neighbours about the proposed schedule of work for the upcoming quarterly period.
37. A log shall be maintained of the results of all daily, weekly and monthly inspections and visual assessments of all emissions control equipment and of any visual dust emissions from the site or processes.	37	1	Examples of the logs viewed and some copies received after compliance visit.

<p>38. That all records that are required by the conditions of this consent shall be made available upon request by an enforcement officer during working hours and shall be kept for a minimum of 2 years from the date of each entry.</p>	38	1	All records were available for inspection.
<p>39. That an enforcement officer shall be notified as soon as practicable in the event of any significant discharge to air, which results or has the potential to result in a breach of conditions numbered 1 to 40 or adverse effects on the environment. The following information shall be included:</p> <p>a) Details of the nature of the discharge;</p> <p>b) An explanation of the cause of the incident; and</p> <p>c) Details of remediation action taken.</p>		NE	There were no incidences that resulted in significant discharges into the air.
<p>40. All air quality complaints that are received shall be recorded. The complaint details shall include:</p> <p>a) The date, time, location and nature of the complaint.</p> <p>b) The name, phone number and address of the complainant, unless the complainant elects not to supply these details.</p> <p>c) Weather conditions, including approximate wind speed and direction, at time of the complaint.</p> <p>d) Any remedial actions undertaken by NZTA.</p> <p>Details of any complaints received and remedial actions undertaken by NZTA shall be provided to the Major Infrastructure Team Manager within 24 hours of receipt of the complaint(s).</p>	40	1	No complaints received since this consent was issued.

COMPLIANCE RATING	
NI	The consent condition was not assessed or inspected.
NE	The consent condition has not been exercised. The condition may refer to a future date or the activity the condition refers has yet to be undertaken.
Category 1	The consent condition has been complied with. Where a condition refers to a provision in a Management Plan, then the Plan has been referred to in assessing consent compliance.
Category 2	<p>The consent condition has not been complied with. AC officers have assessed the non-compliance as technical in nature or having no more than minor actual or potential adverse effect.</p> <p>Category 2 non-compliance is further divided into the following categories:</p> <p>2A - Self-monitoring or one-off data is incomplete, outstanding or not compliant.</p> <p>2B - The item has not been constructed, maintained or operated as required by the consent condition or relevant management plan.</p> <p>2C - Combination of 2A and 2B.</p>
Category 3	The consent condition has not been complied with. AC officers have assessed the non-compliance as either resulting in an adverse effect on the environment or having the potential to result in adverse effect on the environment. Alternatively since the last audit there is evidence of repeat Category 2 non-compliance where ARC officers have previously requested the matter be addressed.
Category 4	The consent condition has not been complied with. AC officers have assessed the non-compliance as resulting in significant adverse effects on the environment or having the potential to result in significant adverse effects on the environment. Alternatively since the last audit there is evidence of repeat Category 3 non-compliance where ARC officers have previously requested the matter be addressed.