

3 March 2017

6 MAR 2017

Total Bridge Services
PO Box 56416
Dominion Road, Auckland 1146

Attention: Hugo Ormazabal

Dear Hugo

RESOURCE CONSENT – COMPLIANCE INSPECTION

Consent Details:

File Ref 8035

Consent Number:	REG-214016
Consent Holder:	NZ Transport Agency
Activity Type:	Discharge To Air
Location:	Auckland Harbour Bridge (AHB), Waitemata Harbour Auckland
Expiry Date:	18 December 2039

This letter is to confirm that the above site was inspected on 8 February 2017. The inspection was held to evaluate the current site conditions and compliance with consent number 38519.

The overall compliance rating is **1 – Full compliance**.

The above compliance rating reflects commitment to a regular inspection, maintenance and monitoring programme which should be continued to ensure on-going compliance with the above consent.

Please be aware that the Auckland Council is a ratepayer funded organisation. For this reason it is our policy to recover costs incurred for compliance assessments, from the consent holder. An invoice will follow, payable by you under section 36 of the RMA, and may include officer's time for travel, file review, site visit, correspondence, report writing and resolution of any non-compliance.

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.iovanovic@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:	REG-214016									
Consent Holder:	NZ Transport Agency Attention: Tammy Muharemi									
Location:	Auckland Harbour Bridge (AHB) Waitemata Harbour Auckland									
Activity Type:	Discharge To Air									
Works Description:										
Expiry Date:	18 December 2039									
Type	Scheduled Date	Actual Inspection Date			Time On-site					
Routine Inspection	19 February 2017	8 February 2017			80min					
Contact Name	Hugo Ormazabal	Position			Delivery Manager					
Inspected By	Action Taken	Inspection Compliance Rating								
Marijana Jovanovic	Letter	NI	NE	1	2	2A	2B	2C	3	4

Summary:

The weather conditions during the site visit were sunny with moderate south-westerly winds. At the site Marijana Jovanovic met with Hugo Ormazabal, Delivery Manager for Auckland Harbour Bridge Alliance (AHBA) and Kathryn McDonald, Environmental Consultant from Opus Ltd for AHBA.

After discussing the compliance with consent conditions a site walkover over the part of the bridge close to the office was undertaken. Few places on the Bridge construction that were painted with the Termarust product were viewed. This product was introduced 2 years ago but due to its long curing time old product -Ferrox has been used. No new products have been introduced.

All relevant records and logs were checked. Annual Maintenance Discharge Report for January – December 2016, was provided during the site visit. There were no complaints received in last few years.

Inspection Items:

Inspection Item	Item No.	Comp. rating	Comment
<p>1. The activity shall be carried out in accordance with the plans and all information submitted with the application, detailed below, and all referenced by the Council as consent number</p> <ul style="list-style-type: none"> Application Form, and Assessment of Effects prepared by Beca Limited entitled "AHB Alliance - Auckland Harbour Bridge Maintenance Discharge, dated 9 October 2014; and <p>Report title and reference Author Rev Dated</p>	1	1	There have been no changes to the plant and processes since this consent was issued.

<p>Adaptive Management Framework Auckland Harbour</p> <p>Bridge Alliance G 8 October 2014</p> <p>Marine Ecology Assessment - "Auckland Boffa Miskell D 3 Harbour Bridge - Marine Ecology Limited September Assessment - Maintenance Discharges " 2014 and associated appendices</p> <p>Discharges to Land Assessment of Effects - "Assessment of Discharges to Soil" Opus International Consultants Limited N/a 3 October 2014</p> <p>Air Quality Assessment - "Assessment of Discharges to Air From Auckland Harbour Bridge Maintenance " and associated appendices Air Matters 6 18 September 2014</p> <p>Washwater Sampling Report Opus International Consultants Limited N/a 19 September 2014</p>			
<p>7. 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.</p>	7	1	Full access permitted.
<p>Navigation and Safety</p> <p>9. 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</p>	9	1	<p>There have being no maintenance work undertaken recently on the main navigation span.</p> <p>In case that work on the navigation pan is planed Harbourmaster's Office would be notified in writing 10 working days prior works starts.</p>
<p>10. The Consent Holder shall notify the Harbourmaster's Office and the Pollution Response Team in the case of any spill of hydrocarbons which enters the Waitemata</p>	10	1	As above

<p>the Spill Response Plan will immediately be deployed as required by the provision of the Spill Response Plan required by Condition 16.</p>			
<p>Adaptive Management Framework 11. The consents shall be implemented in accordance with the AMF. Where there is conflict between the consent conditions and the AMF, the consent condition shall prevail unless alternative agreement is reached between the Consent Holder and Council (Major Infrastructure Projects Team Manager).</p>	11	1	AHBA together with consultants from Opus work on this. Opus undertakes monthly audits.
<p>12. The purpose of the AMF is to enable maintenance activities on the Auckland Harbour Bridge in a flexible and practicable way and to provide for discharges to the environment that avoid remedy or mitigate significant adverse effects by maintaining or reducing discharges within prescribed thresholds. To achieve this purpose the Consent Holder shall undertake the maintenance activities following the process as set out in the AMF (Appendix A of the assessment of environment effects detailed in Condition 1).</p>	12	1	Maintenance activities are undertaken following the processes outlined in AMF.
<p>13. In achieving the purpose of the AMF the Consent Holder shall not exceed the following thresholds (Note: air concentration thresholds apply only over land):</p> <p>Contaminant Coastal Mass Thresholds Period</p> <p>Zinc 223 kg Annual total</p> <p>Abrasive medium I Dust 14,679 kg Annual total</p> <p>Paint (excluding Zinc) 646kg Annual total</p> <p>Contaminant Air Concentration Thresholds and (document reference) Measurement</p> <p>Averaging Period Issue and</p> <p>PM10 501Jg/m3 (MfE) Acute- 24hr</p> <p>Total Suspended Particulates 801Jg/m3 (MfE) Acute - 24hr</p> <p>Zinc 201Jg/m3 (TCEQ ESL) Acute 1hr</p> <p>Lead 1.5g/m3 (Ontario MfE) Acute 0.5hr</p> <p>Chromium 3.61Jg/m3 (TCEQ ESL)</p>	13	1	<p>Model developed by Opus is used to calculate discharges into air from amount of material used for the maintenance over the certain period.</p> <p>Maintenance discharge report for 2016 was handed out at the site visit. Thresholds were not exceeded.</p>

<p>Acute 1hr</p> <p>Iron 501Jg/m3 (TCEQ ESL) Acute 1hr</p> <p>Xylene 350j.Jg/m3 (TCEQ ESL)Odour 1hr</p> <p>Toluene 6401Jg/m3 (TCEQ ESL) Odour 1hr</p> <p>Naptha 35001Jg/m3 (TCEQ ESL) Odour 1hr</p> <p>Ethylbenzene 7401Jg/m3 (TCEQ ESL) Odour 1hr</p> <p>Methyl Isobutyl Ketone 8201Jg/m3 (TCEQ ESL) Odour 1hr</p> <p>Diisocyanates 50j..1g/m3 (TCEQ ESL) Acute 1hr</p>			
<p>Environmental Management Plan</p> <p>14. To demonstrate how the thresholds in Condition 13 will be achieved the consent holder shall submit an updated Environmental Management Plan (EMP) to Council (Major Infrastructure Team Manager) for written approval within 60 (sixty) working days of the commencement of this consent. The Council (Major Infrastructure Projects Team Manager) shall have 20 working days from receipt of a revised EMP to seek changes or the EMP shall be considered endorsed by the Council.</p>	14		EMP submitted 25 March 2015.
<p>15. The EMP is a 'live' document. At any time across the duration of this consent, the consent holder shall be entitled to resubmit modifications to the content to change or improve the processes used to give effect to this consent. The Council (Major Infrastructure Projects Team Manager) shall have 20 working days from receipt of a revised EMP to seek changes or the EMP shall be considered endorsed by the Council.</p>	15	1	There have been no changes to the EMP.
<p>18. To enable summary reporting on compliance with the annual discharge thresholds the EMP shall identify methods and frequency of monitoring which shall include the following;</p> <p>a) Activity carried out: waterblasting, wet abrasive blasting, dry abrasive blasting, or spray painting;</p> <p>b) Location where work was carried out: Coast or land;</p> <p>c) Surface area the activity was carried out on (m²);</p>	18	1	All records are kept electronically and were available for inspection.

<p>d) If abrasive blasting, the amount of agent used (kg), lead content at that location;</p> <p>e) If painting, the amount of paint used (L), and an estimate of the overspray (%) (and guidance on how to estimate this);</p> <p>f) If containment has been used, an estimate of the percentage of containment achieved (and guidance on how to estimate/ determine this); and</p> <p>g) If working within Buffer Zones, the wind speeds and direction.</p>			
<p>19. The consent holder shall submit to the Council (Major Infrastructure Projects Team Manager) an annual report containing a summary of the results of the monitoring data collected in accordance with condition 17 to demonstrate compliance with condition 13 (contaminant thresholds) and conditions 22 to 24. The annual monitoring report shall also include details of any new method or product that has been trialled using the AMF and outline how the steps of this process have been satisfied and any recommended amendments to the EMP.</p>	19	1	Annual Report for 2016 was submitted during the site visit.
<p>Adaptive Process</p> <p>20. To achieve the purpose of the AMF, the consent holder may utilise the adaptation process as provided for by the AMF to test and trial new products and methods. The 4-step adaptation process is set out in the AMF and is guided by the supporting technical sheets that prescribe the testing and trial methodology. Field trialling of new products shall be</p> <p>Limited to a maximum area of 100m² unless alternative agreement is reached between the consent holder and the Council (Major Infrastructure Projects Team Manager).</p>	20		<p>Termarust was introduced in 2015 but because of long curing time has not been used very much. No new products have been introduced yet.</p> <p>Old product 'Ferrox' used in the past is mostly used.</p>
<p>21. Any future amendments to the EMP or plans therein resulting from the implementation of the consent or from the implementation of the adaptation process within the AMF under Condition 20 shall be forwarded to the Council (Major Infrastructure Projects Team Manager). The Council shall have 20 working days from the receipt of the revised EMP to seek changes or the EMP shall be considered to be endorsed by Council.</p>	21	NE	
<p>Specific conditions- air discharge permit</p>	22	1	Maintenance activities have been undertaken in accordance to

R/REG/2014/2140176			requirements of AMF.
22. All maintenance activities resulting in the discharge of contaminants to air over land shall be undertaken in accordance with the AMF to ensure that emissions authorised by this consent are maintained within the thresholds in Condition 13 or minimised where practicable.			
23. The AMF shall be implemented so that beyond the boundary of the state highway designation, there shall be no dust and/or odour caused by discharges from the site, which in the opinion of a Council enforcement officer, is noxious, offensive or objectionable over land.	23	1	There were no dust or odour discharges noted at the site and beyond the boundary during the site visit.
24. The AMF shall be implemented so that there shall be no hazardous air pollutant resulting from discharges from maintenance activities, beyond the boundary of the state highway designation, at a concentration that causes, or is likely to cause adverse effects to human health.	24	NA	
Process Conditions			
25. Air discharges from maintenance activities shall be managed by controls, including but not limited to buffer zones, wind speed and direction thresholds, and containment in accordance with the EMP to meet all relevant air discharge thresholds.	25	1	Wind data is collected and checked few times per day. Mostly spot abrasive blasting and brush painting is used for the maintenance, which is undertaken in accordance to EMP.
26. Abrasive blasting shall be undertaken using abrasive material containing less than 5% dry weight silica.	26	1	Only garnet sand containing, no more than 5% dry weight free silica, has been used. Amount used in 2016 is reduced compared to previous year.
Reporting			
27. The consent holder shall notify Council (Major Infrastructure Projects Team Manager) 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 the conditions of consent or adverse effects on the environment. The following details shall be included: a) Details of the nature of the discharge; b) An explanation of the cause of the incident; and c) Details of remedial action taken.	27	NE	There was no incidence that caused increased discharges into the air.
28. The consent holder shall ensure that	28	1	No complaints in regards to

Consent Inspection Record Updated In D/B



<p>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.</p> <p>Details of any complaints received and remedial actions undertaken shall be provided to the Council (Major Infrastructure Projects Team Manager) within 24 hours of receipt of the complaint(s).</p>			<p>received.</p>
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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.