

Regulatory Compliance Unit

Environmental Health Team

Memo

Date: 21 July 2023
From: Agnes van der Erf

To: Rachel Cottam

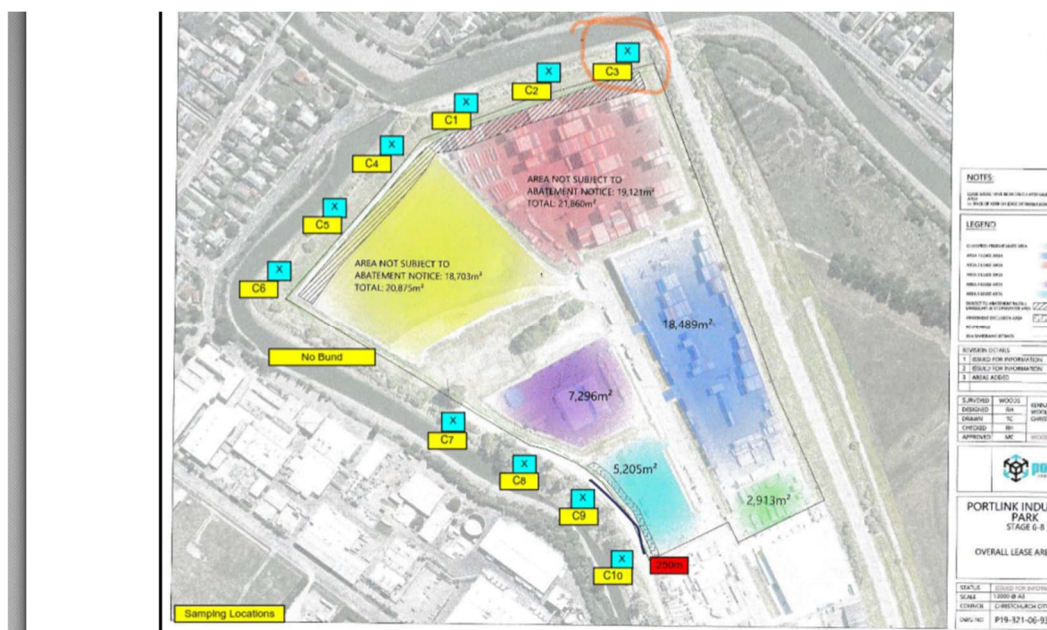
I am Agnes van der Erf and I have worked as an Environmental Health Officer at Christchurch City Council for 5 years. I have a Bachelor of Science and a Post Graduate Diploma in Environmental Health.

I have reviewed the information regarding contamination submitted under application RMA/2022/3611 for the Subdivision – Boundary adjustment with land use at 320A Cumnor Terrace

Contamination

I have reviewed the Detailed Site Investigation (DSI) completed by KPES who sampled the bund soils. Results show that heavy metals levels are suitable for recreational use or even the more restrictive residential use. Some heavy metals are above background levels for the area.

One sample in the northeastern corner closest to the bridge had a detect of asbestos however this was at levels which meet residential land use and poses no health risk to site users or workers in the area. The report confirms that asbestos contamination is not widespread. If soils were to be removed from the bund and taken off site, they may not be suitable for cleanfill disposal, depending on the receiving landfills disposal criteria.



Information was received by Council in late 2022 regarding some asbestos containing material (ACM) in a stockpile located near the haulage road. Testing of this product confirmed it was asbestos however its presence was not extensive within the stockpile and limited to a patch. It is unknown what became of this stockpile and the material it contained. There is a risk, albeit low, that some ACM may remain in this area. Any future earthworks on the haulage road at volumes that would trigger the National Environmental Standards for Contaminated Soils (NESCS), would require a soil investigation.

The subdivision will be controlled under the NESCS and any excess soil may not be suitable for disposal as cleanfill.

Vibrations

I've caught up with Isobel Stout (Senior EHO) regarding the retrospective aspect of this application and we both feel without actually assessing it when it was occurring we have no way of knowing if either noise or vibration was non-complying. There is no effect at the moment and at the time of writing this is not an ongoing issue. If any damage was caused by the vibrations it is a civil matter and contractors have insurance to cover this type of work.

Given that more sensitive residential neighbours are not directly adjacent to the works, with the river providing some separation, any vibrations relating to earthworks should be capable of meeting the vibration standards. However, the compaction works look to be fairly extensive and will more than likely take some time. We can condition that monitoring must be completed while this activity is occurring, requesting reporting back to Council to confirm compliance.

I have considered vibrations caused by the container movements and this would be best addressed through a Handling Guidance document for the site. This document should cover best handling practices that will limit vibrations and noise received at surrounding properties when containers are being moved and should be part of the site induction for new employees with training and regular reviews to keep it current.

Even with a Handling Guidance Document in place, from time-to-time mishaps will occur and containers may be dropped. If residents have concerns about damage to their dwellings, it will be a civil matter between Portlink and themselves (or their insurer). This concern should be raised with Portlink so they can engage engineers to complete surveys, then they will have an understanding of prestart (or current) dwelling conditions.

Dust

With dust there are two areas of concern, day to day wind whipped up movement and that which is a result of earthworks. The Erosion, Sediment Control Plan (ESCP) should be sufficient to manage dust during earthworks with limits/stop work in place during times of high wind and any exposed soils dampened down with trucks and sprinklers, with controls on runoff. The ongoing management of the area until grasses/groundcover has time to grow is a bit more problematic. What is suitable for a subdivision may not pass the requirements of river management areas but the parks/reserves team must have some ideas how best to address this. There are soil binders and polymers which seal the surface but I'm not sure if they'd want those near the river.

Fumigation

Methyl bromide is the usual fumigation pesticide for logs [file \(nzfoa.org.nz\)](https://www.nzfoa.org.nz) and this is quite dangerous in enclosed spaces but once exposed to air it rapidly dilutes and poses little risk. There are regulations and perhaps a licence involved that either MBI or Worksafe enforce for these types of activities (under the old HSNO legislation) and Council don't have any powers to enforce a change in location.

As the current fumigation location is at least 100m away from the nearest residents, there is plenty of distance to dilute any spray residuals. It is also worth noting the prevailing northeast wind will direct it more towards the commercial area. As it is a gas it tends to dissipate upwards on release and if any, only tiny amounts would make it

into the reserve and not at volumes to be harmful to people. Provided they undertake the fumigation activity according to WorkSafe Regulations I don't have any health concerns.

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