

Our Reference: A1638253

File: RM22.099

13 May 2022

Mobil New Zealand Limited  
C/- Andrew Hart (Applicant agent)  
WSP New Zealand

Via email to: [andrew.hart@wsp.com](mailto:andrew.hart@wsp.com)

Dear Andrew

**Request for further information under section 92(1) of the Resource Management Act 1991 (the Act) – Consent Application Number RM22.099**

Thank you for your application to authorise passive discharges of hazardous substances from a contaminated site.

I have made an initial assessment of your application along with Simon Beardmore (E3 Consulting – Land Contamination Specialist) who is providing a technical review on behalf of Council's Resource Science Unit. To be able to make a full assessment of the application, we request the following information under section 92(1) of the Resource Management Act (the Act).

- (1) What investigation has been undertaken on Per and Polyfluorinated Alkyl Substances (PFAS)? What PFAS chemicals have been used, stored or tested on the site? What is the potential for PFAS contamination of soil and groundwater on the site and/or off-site?

Please refer to RM22.099 – Mobil Dunedin Terminal – Technical Review by Simon Beardmore: Section 6.2; Section 7.0 Table 1, answers to Question 2; Section 7.0 Table 2, answers to Question 2; Section 7.0 Table 3, answers to Question 1, answers to Question 2; and Section 8 Summary and Conclusions.

Note PFAS has currently been scoped out of the discharge permit, however if passive discharges are occurring/will occur from PFAS, these will also require authorization by the consent authority.

- (2) Would the applicant consider further physical investigation and monitoring towards the end of the consent term (Year 8 or 9) as part of the consent renewal process?

I have requested this information as it will facilitate the efficient ongoing management of the site, as conditions of consent levied now by Council that relate to this future renewal process may make the future consenting process more cost effective. This would align the applicants and Councils approach to Section 18A Procedural Principles of the Act, particular principles of efficient and cost-effect processes. In addition, this may also serve to support the Affected Party Approval process.

- (3) Based on the additional information requested above, please update the Environmental Management Plans (EMPs) and re-submit.

Note, providing finalised versions rather than draft versions of the EMPs to Council (as part of this Section 92 process) is recommended. Given the obligations that are proposed to be imposed on Chalmers Properties and Dunedin City Council in the draft EMPs, prior to submitting the EMPs to Council, I strongly recommend the applicant obtains acceptance from each party (as part of the Affected Party Approval process).

Your Application will be placed on hold under section 88C of the Act until the requested information has been received.

In accordance with section 92A of the Act, please respond within 15 working days ( from the date of this letter (**due 2 June 2022**) with one of the following:

1. The information requested above; or
2. Written advice that you agree to provide the information, and the date by which you intend to provide it; or
3. Written advice that you refuse to provide the requested information.

Please note that the Act requires Council to publicly notify your application if you do not provide the requested information before the due date (or an agreed alternative date), or if you refuse to provide the information. It is, therefore, important that you contact us promptly to discuss an alternative timeframe if you are unable to provide the information by the due date.

Please note that if the information you provide raises more questions, your application will remain on hold until sufficient information has been provided to enable processing to continue.

If you have any further queries, please contact me on (03) 474 0827 or 0800 474 082.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Louis Brown', written over a horizontal line.

Louis Brown  
Senior Consents Planner