

Our Reference: A1708762

File: RM22.099

11 October 2022

Via email to: andrew.hart@wsp.com
CC: chris.belej@exxonmobil.com

Dear Sir

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 the passive discharge of hazardous substances from a contaminated site.

This application has been limited notified to parties that Council considers to be adversely affected by the proposal. Through this process a submitter highlighted concerns about contaminated groundwater accessing Dunedin City Council stormwater pipes under Halsey Street and then discharging into Otago Harbour. To be able to make a full assessment of the application, we request the following information under section 91(1) of the Resource Management Act (the Act).

Groundwater monitoring wells BH48, BH49, and BH51 have measured naphthalene, ethylbenzene, and xylene at concentrations exceeding ANZG 95% species protection guideline values for marine ecosystems. Groundwater elevations in this area are typically higher than the reported depth of the stormwater lines; therefore, it is possible that groundwater could enter the stormwater system through cracks or joins in the pipes. As such, please provide the following information:

- (1) Please provide any stormwater monitoring data, if any is available, and analysis of data, that would be helpful in determining whether naphthalene, ethylbenzene, and xylene may have entered the stormwater pipes under Halsey Street,
- (2) Please provide any data, and analysis of data, related to measurements of volatile organic compounds from stormwater manholes, if any data is available.
- (3) Please provide an updated assessment on effects to Otago Harbour based on the fact that stormwater may be a potential pathway for contaminants to enter the Coastal Marine Area as a result of this activity.

I require this information to understand the potential adverse environmental effects associated with the potential migration of contaminants from the site to the stormwater lines.

I request a time extension of 20 working days under section 37A of the Act while you are obtaining this information. I will continue to work on the application during this time and this time extension will not impact on timelines for the pre-hearing meeting. Please advise within two working days of receiving this letter whether you agree to this time extension.

If you have any further queries, please contact me on 027 278 7523 or shay.mcdonald@orc.govt.nz.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shay McDonald', written in a cursive style.

Shay McDonald
Consents Planner

A handwritten signature in black ink, appearing to read 'Rebecca Jackson', written in a cursive style.

Rebecca Jackson
Team Leader Consents (Acting)