

Sarah Wainwright

From: Peter Stacey <Peter.Stacey@ghd.com>
Sent: Monday, 3 August 2020 7:24 PM
To: Colleen Prendergast
Cc: 'Brett Hood (brett@reyburnandbryant.co.nz)'; 'Doug & Helen Schmuck (totarahill@xtra.co.nz)'
Subject: EPA - Controlled Work Area

Hi Colleen,

See controlled work area definition below from: *"Decision on the Application for reassessment of Antifouling Paints (APP201051)" Appendix E – Controls for Antifouling Paints*

*"The **controlled work area**, as referred to in subclause (1) is a designated area in which antifouling paints are applied, using a method and located such that off-target deposition of the substance, including onto bystanders, is avoided by taking all practicable steps."*

There appears to be no specific requirement to use screens, however all practicable steps must be taken to prevent "off-target" deposition.

It could be argued that the deployment of screens is practicable, with these being erected along the reserve side of the slipway in a similar manner to the screen used at the bottom of the slipway. The screens could help reduce overspray drifting onto the reserve, particularly for some of the larger vessels which overhang the reserve. However they would be less helpful for the smaller vessels where you can get them further up the slipway and within the confines of the boatyard.

In terms of antifouling emissions, the screens would only be effective if the paint is being applied using a spray gun. Speaking with Doug earlier today, spraying of antifouling represents about 50% of the total application per year, about 35 hours. You would then need to consider the number of hours that large vessels will be worked on that extend out onto the reserve. At a guess this might be less than 50% of the time – **Doug to confirm**. This would equate to only 18 hours per year.

In my opinion, the use of screens is achievable, however it would represent a reasonable amount of effort and cost to only mitigate a very small number of hours of spray painting a year – especially given that they would only be in place to prevent spray drift onto parts of the reserve which are unlikely to be frequented by members of the public.

Please let me know if you require any more assistance, either pushing back against the requirement to use screens, or if this is something that Doug would support, writing a condition around their use.

Cheers

Peter Stacey
BSc, GradDip(Bus), CAQP
Technical Director – Air Quality

Please note, I am working remotely. GHD's commitment to delivering for our clients remains strong, and we understand that through these uncertain times our clients need our support more than ever. I look forward to continuing our work, together.

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