

Wasley Knell Consultants Limited  
PO Box 381  
Tauranga

11 July 2018

**Attention: Greg Knell**

**RE: 25 Ulyatt Road, Napier – request for further information**

Dear Greg,

## Introduction

We understand Napier City Council (NCC) has requested additional information in relation to land at 25 Ulyatt Road, Taradale, Napier, which Bupa Care NZ Limited (Bupa) is looking to develop as an aged care facility. HAIL Environmental provided a Preliminary and Detailed Site Investigation (PSI-DSI) in support of Bupa's resource consent application. You have advised that NCC asked:

### Soil Contamination

*The information submitted within the NESCS report suggests that sufficient sampling has been undertaken and the comments and conclusions provided appear reasonable, however there are some queries in respect of the information provided, which we would appreciate further clarification to these points if possible.*

- *Under heading 5.6, paragraph 2 the analyte name is missing for the eco-SGV of 90 mg/kg,*
- *The conceptual model notes ethofumesate and DDT pose a risk to future users through direct contact and produce consumption. The testing undertaken does not specifically target these agrichemicals and the commentary does not justify why the risk is low with regard to DDT and ethofumesate.*

## Comments

HAIL Environmental comments as follows:

- Regarding the typographic error in section 5.6 of the PSI-DSI, the missing analyte is **copper** – which does not present a risk to human health, but has an eco-SGV of 90 mg/kg, as shown on table 6 on the following page of the PSI-DSI.



- As discussed in section 4.1 of the PSI-DSI, ethofumesate was the principal herbicide in use at the site at the time of the investigation. This herbicide is expected to have a relatively short half-life in soil of around 90 days, and low human toxicity. Accordingly, it is **highly unlikely to pose a significant risk to human health** in future use, and residues would be expected to degrade and pose no further environmental risk within a year or two of use ceasing. Probably for this reason, we have been unable to identify a soil guideline value for it – for example, there is no United States Environmental Protection Agency regional screening level.
- As regards DDT the PSI-DSI is regrettably disjointed, with one logical step omitted from text. What it should have said, is that the site appears to have been in low-intensity pastoral use during the 1950s-1970s, the period when DDT was typically added to superphosphate fertiliser. More recently, the site surface has been stripped and turned several times in the process of turf production. So DDT application would most likely have been relatively low in the first place; and a proportion of the residues would have been removed, while the remainder would have been mixed through the soil profile. Accordingly, it is possible that DDTs could still be present in site soils, but at trace levels, **highly unlikely to pose a significant risk to human health**. This is why organochlorine pesticides were not tested for, and the focus was on more modern organonitrogen and organophosphorus pesticides that could have been used during turf production. None of these pesticides were detected.
- We further note that, at this site, sprays were stored outside the area where the proposed activity is to occur. Therefore, we do not expect hotspots of point source contamination within the site.

## Limitations

This letter has been prepared for Bupa Care NZ Ltd by HAIL Environmental in accordance with the purpose and scope set out above, and the usual care and thoroughness of the consulting profession. Any use of any part of this letter by any other party, or in any other context, is the responsibility of the user.

This document does not purport to give legal or financial advice.

## Closing

Should you have any questions related to this matter, please contact the undersigned on 021 036 7764 or [dbull@hailenvironmental.co.nz](mailto:dbull@hailenvironmental.co.nz).

Yours faithfully,



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