



03 AUGUST 2022

**Hauraki District Council**

c/- Leigh Robcke

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**HD1655 – Waihi North – Section 92 - Request for further information**

Dear Leigh,

Thank you for the opportunity to review the contaminated land documents for the Oceania Gold Waihi North project. I have reviewed relevant portions of the consent application, which include:

- Overarching Assessment of Environmental Effects
- Site-specific Assessment of Environmental Effects
- Waihi North Project - Preliminary Site Investigation (Ground Contamination)
- Site Management Plan (Ground Contamination)

**Additional information requested**

The following additional information is requested:

- The preliminary site investigation (PSI) notes asbestos as a contaminant of potential concern (CoPC) for some of the buildings. However, potential lead-based paint has not been mentioned and was frequently present on buildings with asbestos present. Has lead-based paint been considered? If not, please explain why it was ruled out.
- There is no mention of contamination from treated timber poles at the stockyards. Please explain why this was not considered as a CoPC.
- Arsenic is listed as a CoPC for the market gardens but lead was not. Please explain why lead was not considered as a CoPC.
- There is a tunnel house noted in the historical aerial photos at the processing plant area. This appears to have been discounted as a potential HAIL activity. Please clarify.
- The PSI says only class B asbestos is expected to be present in soils. Please provide detail and rationale for this conclusion.
- The PSI is not certified, which is required by Contaminated Land Management Guidelines (CLMG) No. 1 (revised 2021). Please provide certification and associated professional qualifications.

- The draft SMP contains generic remedial action plans (RAPs) that do not meet CLMG No. 1 requirements. This is sufficient for now, and the proposed conditions (HCC 89 – 92) address the SMP update. Please verify that the updated site-specific RAPs meeting CLMG No. 1 requirements will be included in the updated SMP (following completion of the DSI).
- The SMP references a sampling plan for the DSI. Will this be provided to Council for review prior to implementation?
- Composite sampling is recommended in several instances in the SMP. Please provide additional information around how this meets CLMG No. 5 requirements.
- Contamination from historic sheds was discounted. Please provide the rationale (e.g. the area has been tilled).
- No analysis for polycyclic aromatic hydrocarbons (PAH) is recommended for the fuel tanks. Please explain why this was not considered as a CoPC.
- The SMP requires 2 samples to validate hydrocarbon remediation. Please provide the rationale for this statement. Alternatively, this may be included in a RAP; if so, please clarify.

Please let me know if you have any questions.

Kind regards,



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