

Compliance monitoring assessment Otaki Wastewater Treatment Plant 2021-2022


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| Consent No: | WGN160002 [33564 & 33565] | Date: 30/11/2022 | Monitoring officer: Claire McKeivitt |
| Activity: | To discharge treated wastewater to land and contaminants to air from the operation of the Otaki Wastewater Treatment Plant. | | |

Your compliance rating

This report assesses compliance for the period 1 July 2021 to 30 June 2022.

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| [33564] | | LOW RISK NON-COMPLIANCE |
| [33565] | | Most conditions met. Some action may be required |

Overall compliance summary for Otaki WWTP:

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| <p>GOOD</p>  | Overall good management of site and consents. The consent holder is generally effective in meeting their consent requirements. There were some minor breaches of consent conditions, however the consent holder is operating within the scope of environmental effects and administrative requirements considered when their consents were issued. |
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Operations and Maintenance Manual (OMM)

Condition 6 sets out the requirements for the OMM, and condition 7 sets the intervals for which the OMM should be reviewed. Thank you for submitting the updated OMM V8 (September 2022) which takes into account the land discharge treatment area (LDTA) upgrades.

Action required: The updated OMM does not include the following information. Please address by updating the OMM by 30 January 2022:

- Condition 6 requires the OMM to be prepared in collaboration with Ngā Hapū o Ōtaki. In the 2019 OMM update, you stated that Ngā Hapū o Ōtaki were involved in the LDTA report, and would be involved in the OMM update, and therefore were not involved in the 2019 OMM. Please provided evidence of Ngā Hapū o Ōtaki 's involvement in the OMM update.
- Condition 6 a) details, including a map of the current LDTA and the reserve area;
- Condition 12 requires flow meters at the inlet, this is not discussed in the OMM and should be.
- Condition 27 requires a reserve area of 5.45 ha to be retained, and for it to be shown in the OMM (Note 2), there is no map which shows this area.

Effluent Quantity

Condition 9 limits the discharge of effluent to 2,820 m³/day. The maximum effluent discharge for 2021/2022 was 2,801 m³. We understand that in response to previous breaches of the effluent discharge rate, automatic

controls now lock the effluent pumps so they are unable to exceed the discharge limit. You have been assessed as **compliant** with condition 9 for this annual compliance reporting period.

Condition 11 requires you to provide 5,000 m³ of wet weather storage. This condition also requires you to provide an assessment in the annual report comparing the actual inflow volumes to the wastewater treatment against the inflow volumes predicted in the resource consent application.

You have provided calculations showing the storage requirements for the forecasted flows in the year 2036 under both wet and dry weather conditions. You have concluded that to maintain this storage, adjustable outlet weirs should be installed, and that sludge in the oxidation ponds should be kept below 20%. You have been assessed as **compliant** with this condition.

Effluent Quality

All effluent quality monitoring required by conditions 15, 16 and 17 has been completed and is **compliant**.

Groundwater Quality

Condition 18: requires the consent holder to monitor on a monthly basis ground water levels and quality at bores 1, 2, 3, 4, 5, 6 and 7 and water quality in the spring (at NZTM 1779714.5486078) for:

- BOD5 (g/m3)
- Chloride (g/m3)
- E. coli (MPN/100ml)
- Ammonia Nitrogen (g/m3)
- Nitrate Nitrogen (g/m3)
- Nitrite Nitrogen (g/m3)
- Dissolved reactive phosphorus (g/m3)
- Total phosphorus (g/m3)
- Temperature (oC)
- pH
- Conductivity (µs/cm at 25oC)

The data has been collected for the seven bores plus the spring for each of the above parameters. All monitoring was undertaken as required.

Condition 19 sets out that the water quality samples from bores 4 and 5 should not exceed 100 MPN/100ml of E.coli and 11.3 g/m³ for Soluble Inorganic Nitrogen. The data provided shows compliance with these limits.

Condition 21 requires the consent holder to monitor, and report on water quality data from bores 4, 5 and the surface spring, against contaminant trigger levels. The annual report shows that this monitoring was completed, however, it is noted that the sample results have exceeded the trigger levels for dissolved reactive phosphorus (DRP) in the bores and *E.coli* in the spring.

Condition 21 requires the consent holder to submit a report to GWRC within 40 working days should the results from water quality monitoring exceed the contaminant trigger levels on three consecutive monitoring rounds, which it did for DRP in bore 4 from 19/7/2021 – 22/3/2022 and bore 5 from 12/8/2021 – 8/6/2022. GWRC did not receive a report assessing this within 40 working days, which is **not compliant** with condition 21.

The Cardno annual report assesses the increase of DRP at bores 4 and 5 and notes that the downstream public water supply bores have not seen an increase in DRP. Bore 4 and 5 must be within the plume of the treated wastewater from the land discharge treatment area (LDTA), however, it is assumed that the plume has attenuated by the time it reaches the public supply bores.

Action required:

- The Cardno Annual report states “As the WWTP monitoring bores have been consistently exceeding the limit since testing started in 2016, it is suggested that either the DRP limit for the bores is reviewed (as discussed in previous reports), or alternate or additional bores are placed downstream to identify the extent of the plume”. Please advise which action you will take to get in compliance with your consent requirements by 23 December 2022.

Community Liaison Group, Complaints, and Incidents

Condition 40 requires KCDC set up a community liaison group (CLG) and hold a meeting annually. As yet there has been no CLG established for the Otaki WWTP. Recent correspondence with KCDC shows that actions are being undertaken to organise an independent facilitator.

Action Required:

- Please follow through with your actions and ensure a CLG meeting is undertaken.

Conclusion

Compliance with effluent quality and quantity has significantly improved in the 2021-2022 reporting year from previous years. Due to the ongoing non-compliance with conditions 21 and 40, a formal warning has been issued to KCDC with this compliance report.

Please note that the Greater Wellington Regional Council (GWRC) has a responsibility to enforce the Resource Management Act 1991 (RMA). Accordingly, you should take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your consent.

Your consent incurs variable compliance monitoring charges at your consent anniversary. These charges are likely to increase to reflect any additional time spent monitoring your consent to due to non-compliance.

If you have any questions about compliance monitoring of your consent, or this compliance assessment report, please contact me on 021 227 6647 to discuss.

Sincerely,



Claire McKeivitt

Senior Resource Advisor
Environmental Regulation

GWRC compliance rating system

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| | <p>FULL COMPLIANCE – All conditions met – well done! No further action required</p> <ul style="list-style-type: none"> All conditions assessed are met including supplying information and/or records |
| | <p>LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required</p> <ul style="list-style-type: none"> Minor breach of effects based conditions or works outside scope of consent with low risk of adverse environmental effects Breach of conditions which is technical in nature (eg, failure to submit monitoring report or records) |
| | <p>MODERATE NON-COMPLIANCE – Some condition(s) not met. Action required</p> <ul style="list-style-type: none"> Repeated failure to supply monitoring report or records. Breach of conditions where there are some environmental consequences and/or moderate risk of adverse environmental effects |
| | <p>SIGNIFICANT NON-COMPLIANCE – Many condition(s) not met. Immediate action required</p> <ul style="list-style-type: none"> Breach of conditions where there are significant environmental consequences and/or high risk of adverse environmental effects |

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| <p>VERY GOOD</p> <p>★★★★★</p> | <p>Overall excellent management of site and consents. The consent holder is proactive in meeting their consent requirements. If issues have arisen concerning consent conditions, the consent holder responds with promptness and effectiveness.</p> |
| <p>GOOD</p> <p>★★★★☆</p> | <p>Overall good management of site and consents. The consent holder is generally on top of meeting their consent requirements. Whilst there are some minor breaches of consent conditions, these have no ongoing environmental effects.</p> |
| <p>FAIR</p> <p>★★★☆☆</p> | <p>Overall the management of site and consents is considered to be fair. There are occasional breaches of consent conditions and/or lapses in providing information to GWRC.</p> |
| <p>POOR</p> <p>★★☆☆☆</p> | <p>Overall the management of site and consents is considered to be poor. There are consistent and ongoing breaches of consent conditions. The consent holder is not getting on top of their consent requirements.</p> |

Consent monitoring charges

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| <p>Each consent receives a consent monitoring charge from GWRC.</p> <p>This charge is made up of three parts:</p> <ul style="list-style-type: none"> A <i>customer service charge</i> that covers the administrative cost of your consent(s); A <i>compliance monitoring charge</i> that covers all actual and reasonable time associated with assessing compliance with your consent(s) including the time spent visiting and assessing your site, information and reports you submit, file notes, travel time and reporting to you on compliance with your consent(s); and A <i>State of the Environment (SoE) charge</i> that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity. <p>For further information on consent monitoring charges, please see our <i>Resource Management Charging Policy</i>.</p> |
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