






DRAFT compliance monitoring assessment, 1 July 2018 – 30 June 2019


Consent No:	WGN980083	Date: 12 September 2019	Monitoring officer: Josie Burrows
Activity:	[496] To occupy and use the coastal marine area with a concrete deflection wall and outfall structures [1536] To discharge contaminants to air from the Porirua City Council Wastewater Treatment Plant [33805] To discharge treated effluent from the Porirua City Council's Wastewater Treatment Plant		

Your compliance rating

This report covers the period 1 July 2018 to 30 June 2019. The consents have been rated as follows:

[1536]		COMPLYING Well done! No further action required
[469]		MINOR NON-COMPLIANCE Condition(s) not met / Action required (see comments below)
[33805]		NON-COMPLIANCE Condition(s) not met / Immediate action required (see comments below)

Overall compliance summary for the Porirua Wastewater Treatment Plant:

POOR 	Overall poor management of site and consents. There are repeated and/or multiple breaches of consent conditions. This is resulting in actual or potential environmental effects that are beyond what was considered when the consents were issued. This is considered unacceptable and the consent holder needs to give immediate attention to meeting their consent requirements.
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Comments

WGN980083 [33805] To discharge treated effluent from the Porirua City Council's Wastewater Treatment Plant

Quality of effluent discharge

Condition 11 requires the consent holder to take the following samples for the specified analyses and compare to the consented limits:

- Daily 24 hour flow proportioned composite - Biochemical Oxygen Demand (BOD₅) and suspended solids
- At least 20 grab samples per month - faecal coliform bacteria.

- Quarterly 24 hour flow proportioned composite – specified metals and other compounds.

The consent holder completed all required testing, except for one grab sample during the month of June (operator change-over period). There were no exceedances of the consent requirements for BOD₅, suspended solids or specified metals and other compounds.

Faecal coliform limits were exceeded in January 2019. This event and investigation is discussed further in the ‘breaches of consent conditions’ section.

Volume of effluent discharge

Condition 12 requires the consent holder to continuously monitor and record the treatment plant effluent flow. The consent authorises the average discharge flow of 24,000m³/day and peak discharge of 92,800m³/day.

The consent holder provided this data, which showed the average discharge flow of 24,000m³/day was exceeded in six months during the compliance period, and the annual average flow also exceeded this limit at 24,132m³/day. This is a reduction from the 2017-18 period (average discharge flow exceeded for eight months; annual average flow 26,732m³/day).

The consent holder advised via phone call that the effluent flow rate has exceeded the consented limits due to improvements throughout the Porirua network and population increase in Porirua. The improvements in the network mean there is more wastewater reaching the plant for treatment, which is a positive outcome for the overall health of the Porirua Harbour.

There were no exceedances of the peak flow rate during this compliance period.

Shoreline monitoring

Condition 14 requires monthly and post overflow discharge event monitoring for enterococci and faecal coliforms is undertaken at six shoreline locations between Titahi Bay Beach and Te Korohiwa Rocks.

The annual report identified that the control site has been moved to Whitireia Road, due to health and safety concerns with the original location. I consulted with Dr Claire Conwell (Senior Environmental Scientist, Greater Wellington Regional Council) to determine whether this was an appropriate control site for this sampling regime.

Dr Conwell requested WWL provide the rationale for selecting the control site, including details on how it relates back to the activity and how it is interpreted in relation to the other monitoring sites. The consent holder provided this information, and Dr Conwell confirmed she was comfortable with the location of the control site and the sampling points. The control and monitoring sites will be formally re-assessed during the re-consenting process.

The annual report identified that samples are collected during a discharge event, and if there is no discharge event during the month the samples are collected at the end of the month. I consider the wording of the condition requires shoreline sampling to be undertaken if there is a discharge event **in**

addition to monthly non-event monitoring, so that there is an understanding of the standard operational and discharge event effects on coastal water quality.

In future, please ensure samples are taken monthly and discharge event samples are taken in addition to the monthly sample.

Bypass and overflow events

There were 18 consented bypass/overflow events during this compliance year, which triggered the required shoreline monitoring above. These events appear to have been caused by heavy rainfall resulting in sludge carry over, overflow and bypass.

There was one non-consented bypass/overflow event (dry weather sludge carry-over). This is discussed further in the 'breaches of consent conditions' section.

Breaches of consent conditions

The consent holder undertook investigations in relation to two events (October 2018 and January 2019) during this compliance year. These incidents are summarised below.

On 6 October 2018 there was an unconsented discharge from the WWTP. The discharge was sludge carry over and occurred during dry weather. WWL investigated and submitted a report to GWRC. GWRC decided to prosecute WWL regarding the unconsented discharge. The sentencing hearing date is 13 September 2019.

In January 2019 faecal coliform limits were exceeded in a number of samples, resulting in the 20 sample geometric mean of 1,134cfu/100mL (consent limit 1,000cfu/100mL). The consent holder identified this was due to the build-up of material in the channels from the clarifiers leading to the UV system and the malfunctioning blower system.

A rental blower was hired and installed, however this did not have the capacity of the existing blowers so could only be used as a support unit. The consent holder has been in contact with the supplier regarding an upgrade to increase the capacity, however there have been challenges with the supplier which has resulted in several delays and there is not a formal start date for this upgrade project.

The consent holder has identified that the long term solution is to replace the blowers. The shipping date for the new blowers has been pushed back to arrive on site in August 2019 with installation to be completed in September 2019.

Minimising infiltration and ingress to the sewerage system

Condition 23 requires the consent holder to investigate and implement ways and means of minimising infiltration and stormwater ingress into the sewerage system, and report annually on the progress made.

In this compliance year, a wastewater overflow monitor was installed at the Paremata wastewater pump station to monitor overflow to stormwater at this location. Water quality monitoring, which is used to assess and prioritise catchments for investigation, was continued.

A feasibility study was carried out to identify suitable wastewater storage sites across the CBD and numerous wastewater and stormwater asset renewals and investigation works were completed.

Overall, I consider these works to be very positive, and agree they will improve the reliability of the wastewater network and have positive public health outcomes.

Community Liaison Group

The consent holder held the annual meeting on 13 November 2018 and distributed the minutes of this meeting to the group, thus fulfilling the obligations of condition 24.

The residents considered the signage regarding discharges at Titahi Bay Beach is up too long and needs to be removed once the incident is over. There was discussion on potential lockable signs at permanent locations that could be used when there is a possible health risk. It was identified that further discussion by WWL would be required with interested parties for this to be taken forward.

An update was provided on 6 October 2018 unconsented discharge from the WWTP, and that a new plant alarm system was in place. It was identified that better notifications of the Wardens was required, and WWL spoke about a review of the communications procedure.

Consent rating:

This consent is rated as *Non-complying (Major)*.

WGN980083 [1536] To discharge contaminants to air from the Porirua City Council Wastewater Treatment Plant

This consent is rated as *Complying*. Please continue to comply with all consent conditions.

WGN980083 [496] To occupy and use the coastal marine area with a concrete deflection wall and outfall structures

Compliance correspondence indicates that the 'elbow' of the outflow pipe was damaged during storm conditions. **Please provide an assessment of the effects of the damage to this structure and identify whether remediation of the structure is required, by 31 October 2019 or a later mutually agreed upon date.**

This consent is rated as *Non-complying (Minor)*.

Obligations

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.

On this occasion we have decided not to take any further enforcement action because of the current enforcement action being undertaken in relation to the 6 October 2018 discharge, and the actions you

have taken to install blowers in relation to the January 2019 event. However, we may not be so lenient should you be responsible for any further breaches of the Resource Management Act 1991 RMA. Accordingly, you should to 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.



GWRC compliance rating system

	<p>COMPLYING – Well done! No further action required – keep complying with your consent conditions</p> <ul style="list-style-type: none"> Administrative conditions assessed are met (e.g. supplying information and/or records) Effects based and best practice conditions assessed are met (e.g. complying with any maximum limits) Some very minor breaches of consent conditions where no explanation or follow up is considered to be required
	<p>MINOR NON-COMPLIANCE – Condition(s) not met / Some action required</p> <ul style="list-style-type: none"> Failure to supply information and/or keep adequate records. Failure to adequately notify GWRC of works Minor works outside scope of consent issued but within scope of environmental effects considered when consent processed. Minor breach of effects based or best practice consent conditions
	<p>NON-COMPLIANCE – Condition(s) not met / Immediate action required</p> <ul style="list-style-type: none"> Previous minor non-compliance has not been fixed or corrected Breach of effects based or best practice consent condition with more than minor actual or potential environmental effects Works outside scope of consents with more than minor actual or potential environmental effects

<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

Each consent receives a consent monitoring charge from GWRC.

This charge is made up of three parts:

- A *customer service charge* that covers the administrative cost of your consent(s);
- A *compliance monitoring charge* 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 *State of the Environment (SoE) charge* that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity.

For further information on consent monitoring charges, please see our *Resource Management Charging Policy*.

