

Compliance monitoring assessment


Consent No:	WGN980083	Date: 19.10.2021	Monitoring officer: Alice Bird
Activity:	<p>[496] To occupy and use the coastal marine area with a concrete deflection wall and outfall structures.</p> <p>[1536] To discharge contaminants to air from the Porirua City Council's Wastewater Treatment Plant.</p> <p>[33805] To discharge treated effluent from the Porirua City Council's Wastewater Treatment Plant.</p>		

Your compliance rating

This report covers the period 1 July 2020 to 30 June 2021. The consents have been rated as follows:

[1536] [496]		FULL COMPLIANCE All conditions met – well done! No further action required
[33805]		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required (see comments below)

Overall compliance summary for Porirua Wastewater Treatment Plant:

<p>FAIR</p> 	<p>Overall fair management of site and consents. The consent holder struggled to meet aspects of their consent requirements. There were more than occasional breaches of consent conditions that manage environmental effects and/or issues with meeting administrative related consent conditions.</p>
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Comments

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

Condition 11 requires the consent holder to take samples for the specified analyses and compare the results with the consented limits. Table 1 below outlines the sampling requirements and an assessment of the results from the 2020-2021 year against those requirements.

Table 1: assessment of condition 11 requirements

Condition requirements	2020-2021 assessment
Daily 24 hour flow proportioned composite – Biochemical Oxygen Demand (BOD5) and suspended solids	There were no exceedances of the consent requirements for BOD5 or suspended solids.
At least 20 grab samples per month – faecal coliform bacteria	The months of October 2020 and December 2020 exceeded the consent requirements for faecal coliforms.
Quarterly 24 hour flow proportioned composite – specified metals and other compounds	There were no exceedances of the consent requirements for specified metals and other compounds.

The exceedances of faecal coliforms during October 2020 and December 2020 were *non-compliant* with condition 11.

Condition 12 requires the consent holder to continuously monitor and record the treatment plant effluent flow.

As agreed between GWRC and the consent holder, the consent holder is required to continuously monitor and record the treatment plant influent flow rather than effluent flow. This being due to the inflow and outflow effluent being equivalent and the flow meters on the inlet being more accurate than on the outfall. The influent data was provided when requested by GWRC and is therefore, *compliant*.

Condition 14 requires the permit holder to monitor the enterococci and faecal coliform contents of the receiving waters at six shoreline locations between Titahi Bay Beach and Te Korohiwa Rocks.

Additionally, the permit holder shall establish a sample control site and measure background enterococci and faecal coliform contents of the coastal waters.

The original control site posed a health and safety issue for the technician when collecting the sample. A meeting was held on 29 August 2019 regarding the reallocation of the control site sampling location and GWRC agreed to the new sample location. The shoreline monitoring summary was submitted with the annual report. This was *compliant* with the requirements of condition 14.

Condition 15 requires the water at all sampling locations required by condition 14 to be monitored for enterococci and faecal coliforms monthly. In the event of a discharge of partly or untreated sewerage effluent due to either plant malfunction, plant overflow, or plant bypass, the waters shall be further monitored at or about 24 hours, 72 hours, and 144 hours after that discharge commenced.

There were 14 bypass discharge events that occurred throughout the 2020-2021 compliance period. The breakdown for each month and explanation of the events were covered under condition 21 in the annual report.

As noted in previous compliance reports, at the time of consent granting, bypass discharges were expected to be so infrequent as to not warrant a need for a separate discharge permit. Therefore, several of these 14 bypass discharges were unauthorised. This matter is being addressed through the consent renewal process.

Condition 17 requires the permit holder to produce quarterly monitoring reports and forward them to GWRC.

All four quarterly reports were submitted to the satisfaction of the Manager, GWRC and are *compliant* with this condition.

Condition 18 requires the permit holder to undertake a number of steps when there has been a breach of condition 11.

There were two exceedances in effluent coliform limits during October and December 2020. A detailed report was received by GWRC regarding these incidents. Therefore, this condition is *compliant*.

Condition 21 requires the permit holder to undertake a number of steps in the event of a plant malfunction or discharge of untreated or partially treated effluent.

During the 2020 – 2021 compliance period, there were 14 bypass discharge events. This is more than the previous year when there were 12 bypass discharge events. In January and March 2021, there were

two incidents of a release of un-disinfected effluent discharge. The investigation reports for these incidents were received by GWRC.

These discharges included two bypasses of the UV treatment stage, these occurred on 22 January 2021 and 22-23 March 2021. In response to these discharges of partly treated wastewater GWRC issued Veolia Water New Zealand and Wellington Water limited with abatement notices requiring them to carry out actions to prevent further bypasses of the UV treatment stage.

Wellington Water confirmed that the corrective actions listed at clauses 4(a)(i)-(v) of the abatement notices had been completed by the due date of 30 September 2021. They also requested a change to clause 4(a)(vi) to amend the UV upgrade project completion date to 28 February 2022. This aspect is ongoing.

Condition 23 requires the permit holder to take all reasonable steps to investigate and implement ways and means of minimising infiltration and stormwater ingress into the sewerage system and provide the Manager, GWRC with an annual progress report.

An inflow and infiltration report was received by GWRC and is therefore *compliant* with condition 23.

Condition 24 requires the consent holder to establish a community liaison group. The consent holder held the annual meeting on 7th October 2020. The following points were noted:

- Veolia mentioned that the telecommunications to the plant had been improved and that they had received an odour complaint from a neighbouring farm and were awaiting for ideal conditions to begin investigations.
- Wellington Water Limited provided an update on the consent being sought in relation to wet weather discharges from the Porirua network. The consent application was being developed at the time and was expected to be lodged with GWRC by the end of June 2021.
- The new government freshwater direction was addressed and it was understood that the GWRC policy team would have to give effect to these higher level documents in the PNRP
- Management of the signage at Titahi Bay Beach has been transferred from the WWTP operations to Wellington Water Network Performance team
- Pump station discharges were discussed as a general source of concern for the community
- Conditions 4, 11(b), 12, and 15 were questioned and answered sufficiently.

Consent rating:

Consent WGN980083 [33805] is rated as *significantly non-compliant*.

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

Condition 8 requires the permit holder to carry out monitoring of air-borne pathogens to demonstrate compliance with condition 6 or 7 if so requested by the Manager, Consents Management, Wellington Regional Council. This information was not requested in the 2020-2021 compliance period.

Condition 9 requires the consent holder to keep a record of any complaints received. No complaints were received during the 2020-2021 compliance period.

Condition 10 requires the consent holder to notify GWRC if an incident occurs that may cause or has caused adverse effects on the environment at or beyond the site boundary. No incidents occurred throughout the 2020-2021 compliance period that may have caused adverse effects on the environment at or beyond the site boundary.

Consent rating:

Consent WGN980083 [1536] is rated as *fully compliant*.

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

Condition 6: maintenance of the outfall and deflection wall

The 2019-2020 compliance report required the consent holder to submit an assessment of the effects of the damage to the outfall structure and identify whether remediation of the structure is required, by the 31st December 2020. This assessment was submitted and met the requirements of the Manager, Environmental Regulation.

Consent rating:

Consent WGN980083 [496] is rated as *fully compliant*.

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.





Please find attached a formal warning for the exceedances of effluent quality during the months of October 2020 and December 2020.

An extension of time has been requested to comply with clause 4(a) (vi) of abatement notices A960, A961 and A962. GWRC will re-issue the abatement notices with the revised due date for this action.

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>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

<p>VERY GOOD</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>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>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>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

<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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