

## Compliance monitoring assessment

Consent No:	WGN980083	Date: 14/12/22	Monitoring officer: Amanda O'Brien
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 2021 to 30 June 2022. The consents have been rated as follows:

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

*Overall compliance summary for Porirua Wastewater Treatment Plant:*

<p><b>FAIR</b></p> <p>★ ★ ☆ ☆</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 2021-2022 year against those requirements.

*Table 1: Assessment of condition 11 requirements*

Condition requirements	2021-2022 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 month of December 2021 exceeded the consent requirements for faecal coliforms for each day between 1-4 December.
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 December 2021 were *non-compliant* with condition 11.

GWRC issued a please explain letter on 9 March 2022. Wellington Waters' response was that non-compliance in effluent faecal coliform was due to a failure of the automated communication between the flow meter and the UV and wet weather.

The UV system was run on manual mode to return faecal coliform levels back to normal by 23 December 2021. The communication issue in the UV system was resolved on 11 March 2022. The new UV system was expected to substantially increase the capacity of the plant's disinfection system and will further reduce the risk of non-compliance with effluent faecal coliform limits. No further enforcement action was taken for this condition; however, enforcement action was undertaken on the failure to get the new UV system operating within the specified timeframe (see below).

**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, therefore, this condition is *compliant*.

The peak flow was within the consented allowance while average flow was 4,496 cubic meters higher (28,496 vs 24,000 cubic meters), noting several large inflows throughout the year.

**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 and 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 treated 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 10 consented bypass discharge events and 1 unconsented discharge event that occurred throughout the 2021-2022 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. This matter is being addressed through the consent renewal process.

The annual report has been requested to be re-issued to include missing monitoring results for March, April, and May 2022. Results were sited and therefore, this condition is *compliant*.

**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 was one exceedance in effluent coliform limits during December 2021. A detailed report was received by GWRC regarding this incident. 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 2021 – 2022 compliance period, there were 10 bypass discharges during this reporting period, and one sludge carryover event on 19th August 2021. This is less than the previous reporting period where there were 14 bypass discharge events.

On 19 August 2021 there was an unauthorised sludge carry over incident. No investigation was able to be undertaken by GWRC as we were not notified of the incident occurring. GWRC issued a please explain letter on 9 March 2022. Wellington Waters' response acknowledged that not notifying GWRC was a failing and was in discussion with Veolia to improve the communication process. No further enforcement action was taken.

Since the incident, a detailed investigation was undertaken which made a number of recommendations:

- The report concluded that the mixed liquor suspended solids (MLSS) was not being adequately controlled at the time, but with suitable control the plant would have capacity for the peak wet weather flow.
- the most significant recommendation was one being to reduce MLSS below 3,500 mg/L, which was completed by late 2021.
- Automated monitoring has now been installed in the three clarifiers to enable continuous monitoring of the sludge blanket level in each clarifier.
- A follow up investigation of sludge settling parameters completed in March 2022 has shown that through these efforts' sludge is now settling significantly better in the clarifiers than it was in 2021.

During the previous compliance reporting period, in response to discharges of partly treated wastewater, GWRC issued Veolia Water New Zealand and Wellington Water limited with abatement notices on 9 August 2021 requiring them to carry out actions to prevent further bypasses of the UV treatment stage. Actions since include:

- Corrective actions of most items listed in the abatement notice were reported as completed by the 30 September 2021 date (During this reporting period).
- Wellington Water requested to change the date for the requirement that the UV upgrade project be completed to 28 February 2022, which was granted.
- A further extension to 30 April 2022 was requested. This request was denied.
- By 18 May 2022 an inspection was carried out by GWRC that identified the old UV system as still operating with the new system installed but not operating.

- By not completing the UV upgrade by the 28 February 2022, Veolia Water New Zealand and Wellington Water limited breached their abatement notice. Infringement notices and formal warnings were issued on 26 August 2022.
- The UV system is now operating, however, one of the units has been unable to take its designed flow. It is understood this issue is with the manufacturer, and no solution has yet been identified.

**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 as part of the annual report. During this compliance period wellington water continue to make progress on minimising infiltration and stormwater ingress. Of note is the completion of the Duck Creek/Whitby Inflow survey; smoke testing, dye testing and CCTV inspections for both wastewater and stormwater assets in Titahi Bay, Semple Street and Bothamley Park and capital works carried out within the treatment plant catchment along with considerable proposed 2022/23 works noted.

This condition is considered *compliant*.

**Condition 24** requires the consent holder to establish a community liaison group. The consent holder has held a meeting on 23 November 2021. A webinar meeting was held 11 November 2021 to discuss the clarifier sludge carry over issue. Another meeting is scheduled for December 2022, however this is likely to now occur in early 2023.

All other consent conditions (not noted above) were *compliant*.

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 6** requires the permit holder no discharges to air that are noxious, dangerous, offensive or objectionable beyond the treatment plant boundary.

There were no discharges beyond the property boundary that were assessed by a warranted enforcement officer as being noxious, dangerous, offensive or objectionable. Therefore, this condition is *compliant*.

**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 2021-2022 compliance period, therefore, this condition is *compliant*.

**Condition 9** requires the consent holder to keep a record of any complaints received. During the 2021-2022 compliance period, three complaints were received, therefore, this condition is *compliant*.

**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 2021-2022 compliance period that may have caused adverse effects on the environment at or beyond the site boundary, therefore, this condition is *compliant*.

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 31<sup>st</sup> December 2020.

This assessment was submitted and met the requirements of the Manager, Environmental Regulation. Dispersion modelling showed no remediation works are required. No further conditions are required under this condition; therefore, this condition is *compliant*.

Consent rating:

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

## GWRC compliance rating system

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

<p><b>VERY GOOD</b></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><b>GOOD</b></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><b>FAIR</b></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><b>POOR</b></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

<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"> <li>A <i>customer service charge</i> that covers the administrative cost of your consent(s);</li> <li>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</li> <li>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.</li> </ul> <p>For further information on consent monitoring charges, please see our <i>Resource Management Charging Policy</i>.</p>
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