


Compliance monitoring assessment

Consent No:	Multiple, see below	Date: 20 February 2023	Monitoring officer: Joseph Edmonds
Location:	Seaview Wastewater Treatment Plant		
Consents:	<p>Discharge and overflow consents associated with the operation of the Seaview Wastewater Treatment Plant.</p> <p>WGN050359 [24539] Discharge permit to discharge secondary treated and disinfected wastewater to the coastal marine area through an existing outfall at Bluff Point.</p> <p>WGN120142 [33406] Discharge permit to temporarily discharge treated wastewater to the Waiwhetu Stream during and/or immediately after heavy rain events when flows exceed the capacity of the main outfall pipeline and the storm tank system is fully utilised.</p> <p>WGN120142 [33407] Coastal discharge permit to temporarily discharge treated wastewater to the coastal marine area, and onto land where it may enter streams or the coastal marine area from planned repairs, unplanned repairs, leaks associated with temporary repairs, and minor leaks in relation to main outfall pipeline from Seaview Wastewater Treatment Plant to Pencarrow Head.</p> <p>WGN120142 [33408] Discharge permit to temporarily discharge treated wastewater from the Seaview Wastewater Treatment Plant to the Waiwhetu Stream when the main outfall pipeline is being repaired.</p> <p>WGN120142 [31740] Coastal permit to construct a temporary channel on the foreshore to direct treated wastewater discharged from scour valves on the main outfall pipeline into the sea to allow pipeline repair to be undertaken.</p> <p>WGN950162 (01) [1492] Discharge permit to discharge contaminants (Methylmercaptans and H₂S) to air from the operation of a Wastewater Treatment Plant.</p> <p>WGN930193 (01) [47] Coastal discharge permit to discharge anaerobic sewage decay contaminants (sulphide related compounds) to air from outfall venting structure</p> <p>WGN930193 (02) [1369] Discharge permit to discharge contaminants from sewage outfall structure & effluent into the air.</p> <p>WGN930194 (01) [484] Coastal permit to construct and use a sewer outfall.</p>		

Your compliance rating for 1 July 2021 to 30 June 2022

[31740]		FULL COMPLIANCE All conditions met – well done! No further action required
[1492]		LOW RISK NON-COMPLIANCE Most conditions met. Some action may be required
[24539], [33406], [33407] & [33408],		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required (see comments below)
[47], [1369], [484]		Not Assessed Conditions of these consents are not annually assessed.

Overall compliance summary for consents associated with the Seaview WWTP:

<p>POOR</p> 	<p>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.</p>
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Summary of compliance issues:

The effluent quality standards for faecal coliforms were exceeded for over six months of the reporting period, this is significantly non-compliant. A please explain was issued by GWRC on 03 March 2022 and a response was received on 08 April 2022. The remainder of the investigation into non-compliant effluent took place outside of the reporting period. However, the result was infringement notices and abatement notices to cease the unauthorised discharge of non-compliant effluent.

During this reporting period, there were two dry weather discharges from power spikes at the Seaview WWTP. These were non-compliant with WGN120142 [33406]. Abatement Notices to cease unauthorised dry weather discharges immediately and comply thereafter were issued on 09 December 2021.

There were two unplanned repairs to the main outfall pipe during this reporting period. The unplanned repair from 11 – 21 January 2022 exceeded the allowable discharge timeframes to the Coastal Marine Area (CMA). This is significantly non-compliant with WGN120142 [33407].

During these two unplanned repairs, the discharge from the Seaview WWTP went to the Waiwhetu Stream. The sampling and monitoring requirements for the 08 – 22 March 2022 discharge were not conducted in accordance with WGN120142 [33408]. The annual report and other reports provided do not make it clear whether the discharges from the unplanned repairs were only discharged on the ebb tide as per WGN120142 [33408].

All the non-compliances listed above are serious. Numerous forms of enforcement action have been undertaken in this reporting period. Should further and continued non-compliance occur, more serious enforcement action is likely. I consider the annual reporting documentation difficult to follow and light in detail. I had to request substantial further information and search through our files to find additional reports. This resulted in additional time being spent assessing compliance. Please note that due non-compliance, annual monitoring charges will be significantly more than previous years.

Discharges under normal operating conditions (WGN050359 [24539])

Condition 2 states that the rate of discharge shall not exceed 3,100 L/s or 268,00m³/day. The data provided in the annual report demonstrates that this condition has been complied with.

Condition 6 requires the consent holder to take daily grab samples and daily 24-hour flow proportioned composite samples of treated wastewater from the sampling location specified in **condition 7**. The samples shall be analysed for the constituents and at the frequencies and detection limits listed in schedule 1 of the resource consent. The annual report and data within quarterly reports demonstrate that the consent holder is compliant with these conditions.

Conditions 9 & 10 of this resource consent provide effluent quality standards and the requirement to notify GWRC in the event that a running geometric mean and/or 80 percentile calculated daily from the monitoring programme exceeds the value stipulated in Condition 9 for more than three consecutive days. WGN050359 [24539] is assessed as non-compliant with Condition 10 because the faecal coliform standards were continuously exceeded between 28 December 2021 and 30 June 2022. You have received a rating of significant non-compliance for this.

A summary of compliance:

- On 03 March 2022, a please explain letter was sent to Wellington Water Limited (WWL), Veolia, Hutt City Council and Upper Hutt City Council requesting an explanation for the non-compliant effluent quality.
- On 08 April 2022, Stantec provided a response on behalf of WWL. The main reason for effluent non-compliance was said to be the reduction of the effectiveness of the UV system because of algae coating the UV lamps. This please explain response contained an explanation of who was responsible for ensuring the UV system is free from algae and kept clean, how this build-up of algae was prevented in previous years, and what steps were taken to remedy adverse environmental effects from this non-compliant effluent quality. The response also outlined what measures will be put in place to ensure this incident does not occur again as well as when the plant is expected to come back into compliance with the effluent quality limits. The report estimated that the plant could come back into compliance by mid-June, but this did not happen.
- This response was considered by GWRC, resulting in GWRC commissioning an ecological, cultural, and public health effects assessment.
- The remainder of this investigation took place outside of this compliance period. For completeness, although WWL was responsive in undertaking investigations, an abatement notice to immediately cease the discharge of non-compliant effluent quality and to continue to comply thereafter, as well as an

infringement notice for the discharge of non-compliant effluent quality, which is an offence under section 15 (1)(a) of the Resource Management Act 1991 was issued 28 September 2022.

- The response from 08 April 2023 stated that the key measure to prevent this incident from occurring again is the purchase and installation of a dedicated sprayer system for each clarifier. It was noted that if algae were identified as an issue, WWL would explore the option of chlorine dosing in the clarifiers. As of January 2023, chlorine dosing and an appropriate monitoring programme has been discussed with GWRC. WWL intend to submit an S127 application to change the conditions of the existing resource consent to allow chlorine dosing to occur as required.

Condition 11 requires samples of effluent to meet specific standards for a range of heavy metals and other contaminants and **condition 13** requires the consent holder to collect coastal water samples at specific locations from November to April and analyse these for faecal coliforms and enterococci bacteria. The sampling undertaken occurred in accordance with these conditions and complied with the standards where applicable.

Condition 14 requires the permit holder to collect samples of green-lipped mussels. No samples were taken during this reporting period because no mussel species have been found in the locations stated by the consent. The next mussel sampling is due in 2023. GWRC has advised that a change of conditions may be necessary. Discussions regarding this change of conditions have been initiated and are ongoing.

Condition 18 requires the Consent Holder to submit an annual monitoring report by 31 July each year. GWRC received the report on 30 July 2022 with all relevant information. Therefore, complying with this reporting consent condition.

In Appendix IV of the annual report, WWL provided an assessment titled: *Seaview Wastewater Treatment Plant Assessment of Effects of Wet Weather Overflow Discharges and MOP maintenance discharges of treated wastewater to Waiwhetu Stream*. This report was compliant with conditions 11, 12, 14 & 25 of WGN050359 [24539].

Condition 22 requires the permit holder to submit an annual report for the main outfall pipeline. This was supplied as a section within the Annual Report and is compliant with condition 22.

Condition 24 requires the permit holder to advise the manager of any work planned in the next 12 months to repair or replace the pipeline. Supplementary information provided by WWL states that a permanent repair of the leak found on 13 December 2022 will be completed between 05 May – 05 July 2023.

Wet weather overflows from the WWTP (WGN120142 [33406])

Condition 2 requires the consent holder to ensure that only secondary treated and UV-disinfected wastewater is discharged to the Waiwhetu Stream via the Seaview WWTP outfall when flows exceed 1520 L/s and the storm tank is fully utilised.

There were two unconsented dry weather discharges that were non-compliant with condition 2, as the discharges were not related to wet weather events when the flow exceeds the capacity of the main outfall pipeline and , the storm tank was not fully utilised. You have received a rating of significant non-compliance for these discharges. Key details include:

- On 01 September 2021, a power fluctuation resulted in the Seaview WWTP shutting down and a non-compliant discharge of 209m³ of fully treated wastewater to the Waiwhetu Stream.

- GWRC issued a please explain letter on 07 September 2021 to Wellington Water & Veolia for the 01 September 2021 discharge.
- The please explain letter was responded to by Veolia and WWL on 17 September 2021. This response contained a list of measures that will be put in place to reduce the chances of such an event occurring again. These included:
 - Lowering the controlled setpoint in the effluent wet well, so that flow is diverted to the storm tank earlier, by 17 September 2021
 - Investigating whether the generators can be started up quicker, by 31 October 2021.
 - Try to reduce the time until the main effluent pumps restart after a power spike.
 - Investigation into technologies to reduce the effects of power fluctuations by December 2021.
- After consideration of WWL's and Veolia's response dated 17 September 2021, GWRC issued Abatement Notices A998 – A1001 on 09 December 2021 to Wellington Water, Veolia, Hutt City Council & Upper Hutt City Council (respectively), to cease unauthorised dry weather discharges immediately and comply thereafter.
- A second dry weather discharge during this reporting period occurred on 23 January 2022, for similar reasons, resulting in 363m³ being discharged to the Waiwhetu Stream.
- On 03 March 2022, GWRC sent a please explain letter requesting information regarding this event
- Stantec provided a response on behalf of WWL on 08 April 2022, this response was considered in our investigations and no further enforcement action was undertaken for this discharge, however enforcement action was taken for non-compliances in other consents below.

Conditions 6 & 7 require the consent holder to notify GWRC within eight hours of any discharge commencing and provide details to the GWRC within two days following the discharge ceasing. The consent holder has generally provided this information to GWRC in a timely manner; therefore, these conditions are compliant.

Condition 8 requires the consent holder to ensure that lockable folding signs are installed and maintained at certain locations to indicate a health warning and advise that the immediate area has been polluted by treated wastewater. The signs shall remain in place for a minimum of 48 hours following the discharge. Evidence of this was not provided in the annual report. However, supplementary information from WWL stated that the signs are opened when wet weather sampling occurs.

There were 14 wet weather overflows in the annual report period. All the wet weather discharges (except for 27 July 2021, 12 October 2021 and 12 February 2022) complied with the sampling requirements pursuant to **Conditions 11 and 12**. Sampling results were provided in the quarterly reports. Discharges separated by less than 24 hours are classified as a single discharge event.

Condition 14 states that the consent holder is required to assess the results collected in accordance with **Condition 11** and **Condition 12** and provide this in the annual report. This has been provided in Appendix IV of the Annual Report. This is compliant with conditions 11, 12 and 14.

- The results show occasionally high concentrations of faecal indicator bacteria in the treated wastewater.
- Some parameters were elevated during overflow discharges, the report stated that there was no observable difference in water quality between upstream and downstream Waiwhetu Stream Sites.
- pH was above the guidelines at Site B and C 36 of the 42 samples.
- CBOD₅ was significantly higher in the treated wastewater discharge samples compared to all Waiwhetu Stream samples.
- Ammoniacal-N concentrations were above the guideline values at Site A (Port Road) on several sampling occasions.
- Nitrate-N concentrations exceeded the guidelines across all sites before and after overflow events. Site C recorded higher concentrations than both Site A and B, indicating a significant upstream source.
- Occasionally, very high concentrations of faecal coliforms, E. Coli and enterococci were recorded in the treated wastewater.

Condition 15 requires the consent holder to provide photographs of the discharge, these have been provided and are compliant.

Condition 16 requires the consent holder to keep a record of any complaints received. There were no complaints received related to wet weather discharges at the Seaview WWTP, the consent holder is compliant with this condition.

Discharges to the Coastal Marine Area from the WWTP associated with leaks and maintenance (WGN120142 [33407])

Condition 2 – requires that only secondary treated and UV-disinfected wastewater is discharged from the main outfall pipe from repairs and leaks authorised under this consent. The data provided in the quarterly and annual reports demonstrate that all wastewater was secondary treated and disinfected during the two unplanned repairs in January and March 2022. However, the faecal coliforms effluent quality was non-compliant with consent condition 9 of WGN050359 [24539].

Condition 4 – the consent holder shall ensure that discharges to the coastal marine area associated with planned and unplanned repairs authorised by this consent do not exceed three days per repair event from any single location and up to seven days in total. There was one unplanned repair in the reporting period that exceeded three days per repair event and up to seven days in total:

- On 11 January 2022 a leak from the Seaview WWTP Main Outfall Pipe (MOP) just past Burdens Gate was discovered. Correspondence during these repairs indicates that scour valve 11 was discharging from 13 January 2022 until 19 January 2022, this exceeds the three-day period authorised by condition 4, therefore, this has been assessed as non-compliant. The scour valves were discharging from at least 12 January until the late afternoon of 19 January 2022. Therefore, this exceeds the 7-day limit for allowable CMA discharges under this resource consent. This is contrary to the supplementary information provided by WWL. I have assessed compliance using the updates provided by WWL at the time of the event.

- On 08 March 2022 there was another leak from the Seaview WWTP Main Outfall Pipe (MOP) at 48 Seaview Road. This unplanned repair resulted in the main outfall pipe being drained through scour valves 1 and 2, which discharge to trade waste, ending back at the Seaview WWTP. I do not consider this to be a discharge to the coastal marine area and therefore this discharge is compliant with condition 4.

I consider the discharge commencing 11 January 2022 to be significantly non-compliant.

Condition 5 - ensure planned repair work is undertaken between 5 May and 5 July each year to avoid discharges to the coastal marine area during open scallop season. The annual report did not contain a section on the planned repair work undertaken during this period. Supplementary information from WWL states that there are no planned repair works for the 2021-2022 reporting period.

Condition 6 - ensure that steps such as the excavation of trenches beneath the scour valves are taken to minimise ponding beneath scour valves and to ensure that so far as practicable treated wastewater drains freely to the Wellington Harbour. Supplementary information provided by WWL states that they consider this condition was complied with, this was shown by photos of scour valves showing free-flowing water directed to the CMA. There were no reported ponding incidents, therefore, no excavation was undertaken.

Condition 12 – requires the consent holder to notify GWRC of any planned and unplanned repairs 48 hours in advance (where practicable) of any planned/unplanned repair work commencing or no later than eight hours after the commencement of a discharge associated with unplanned repairs. Both unplanned repairs were communicated to notifications@gw.govt.nz, rec-wq@gw.govt.nz and healthprotection@huttvalleydhb.org.nz within 8 hours of the discharge commencing, therefore, the consent holder is compliant with this condition.

Condition 13 – requires the consent holder to ensure notification signs are installed and maintained as close as practicable to the scour valve discharge location to indicate a health warning and advise that the immediate area has been recently polluted by treated wastewater. For both unplanned repairs, I received photographic evidence of the erection of these signs, I consider the consent holder to be compliant with this condition.

Condition 14 – requires the consent holder to notify GWRC of the number of scour valves used in the discharge events.

- For the unplanned repair commencing 11 January 2022, scour valves 11, 12 & 13 were initially opened to drain the main outfall pipe. However, no discharge occurred at scour valve 13. On 18 January 2022, scour valve 8 was opened and drained.
- For the unplanned repair commencing 08 March 2022, scour valves 1 and 2 were used to drain the pipe back to the inlet works of the plant.

I consider the notification of the scour valves used in the discharge events to be compliant with condition 14.

Condition 17 requires that discharges associated with planned and unplanned repairs shall not result in any of the following effects on the water of Wellington Harbour beyond 30 m radius of each scour valve:

- 1) The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials; or
- 2) Any conspicuous change in colour or clarity; or

- 3) Any emission of objectionable odour; or
- 4) Any significant adverse effects on aquatic life

During a scour valve discharge, the consent holder shall take photographs of a scour valve and immediate receiving waters around the point of discharge to show the presence of effects (1-4) and any obvious undesirable biological growths or visible die-offs. The consent holder shall identify and take photographs of a control site for comparison, which must be at least 100 m from any stormwater or stream outfall.

The discharge commencing on 11 January 2022 is relevant to this condition. The January to March 2022 Quarterly report contains an assessment against condition 17. Photographs were provided from 12 – 21 January 2022. However, these photographs are very small, and it is impossible to assess effects 1 – 4. The scour valve location is also not listed, and it is not clear whether a control site has been identified with the relevant photos taken. Furthermore, there is no written text to accompany the photographs taken for condition 17. Please ensure that this information is clear and directly discussed in future quarterly reports.

Supplementary information was provided by WWL, including larger photos and a statement that no effects listed in condition 17.a) were observed at any of the locations where the effluent was discharged.

Condition 19 requires that during the summer bathing season (1 November to 30 April) the consent holder shall collect daily water samples 30 m on either side of a scour valve discharging to the sea. Samples shall continue to be collected for two days following the cessation of the discharge.

Sampling results were received from Joemar Cacnio on 21 January 2022. These results were taken at 0-5 cm and 15 cm below the surface of the water and were analysed for faecal coliform and enterococci bacteria. The date and location were recorded, however, the time, weather and tidal conditions were generally not provided. Please ensure that this information is included in the future. I consider this to be technically non-compliant.

Condition 30 requires a detailed summary of repairs undertaken on the pipeline in the last 12 months. The annual report states the start and end times along with the location of these unplanned repairs on the main outfall pipe, however, detail of what these repairs included is missing.

The report also did not detail repair work for the upcoming year, or the condition of temporary repairs made on the pipeline and the programme for a permanent repair. I consider this to be technically non-compliant. Supplementary information stated:

- a permanent repair of the temporary repair undertaken on 13/12/2022 is scheduled between 05 May and 05 July 2023.
- Wellington Water have not had the involvement from the consultation group for FY21/22.
- Photos of the scour valves (required by condition 17(b)) accompanied by field observations or comments as appropriate were provided in a separate pdf after being requested.
- Wellington Water confirmed that they did not receive any complaints related to outfall maintenance under consent [33407].
- Wellington Water did a desktop condition assessment of the Seaview Main Outfall Pipe in November 2021. Wellington Water is currently preparing an investigation project brief for the outfall pipe.

Going forward, please ensure that the annual report contains an assessment of all this information.

Discharges to Freshwater from the WWTP associated with leaks and maintenance (WGN120142 [33408])

Condition 2 requires that only secondary treated and UV-disinfected wastewater is discharged to the Waiwhetu Stream when the main outfall pipe is being repaired. During the two unplanned repairs to the main outfall pipe, records show that the wastewater was fully treated, therefore, compliant with condition 2.

Condition 5 requires that discharges to the Waiwhetu Stream associated with unplanned repairs occur for the shortest possible time and a maximum period of 2 weeks per event.

There were two unplanned repair events during this annual period, they are detailed below:

- On 11 January 2022 a leak from the Seaview WWTP Main Outfall Pipe (MOP) just past Burdens Gate was discovered. This discharge began at 10:56 on 11 January 2022 and ceased at 10:40 on 21 January 2022. The discharge volume for this event was 251 426 m³.
- On 08 March 2022 there was another leak from the Seaview WWTP Main Outfall Pipe (MOP) at 48 Seaview Road. This discharge to the Waiwhetu Stream began on 09 March 2022 and ceased on 22 March 2022, resulting in 628 057 m³ of fully treated effluent being discharged into the Waiwhetu Stream.

From the correspondence received from WWL during these repairs, I consider that the repair time was minimised, and the data above shows these repair events were within the maximum allowable period of 14 days. This is compliant with condition 5.

Condition 6 requires the consent holder to manage the discharge into the Waiwhetu Stream, so that treated effluent is discharged on the ebb tide as far as practicable.

Appendix E from the please explain response provided by Stantec on behalf of Wellington Water on 08 April 2022 shows that the effluent discharge to the Waiwhetu Stream from 11 – 21 January 2022. The data and graphs provided were inconclusive and difficult to interpret. However, my interpretation was that the wastewater was not only discharged on the ebb tide. I was not able to interpret the discharge to the Waiwhetu stream from the March 2022 discharge.

Supplementary information provided by WWL states that discharging on the ebb tide was undertaken as far as practicable by using the storm tank to manage the flow. If the storm tank is already full, then it is necessary to discharge to the stream on a flood tide. Graphs were provided showing the storm tank levels during both repair events.

I was not able to interpret the different graphs provided and a clear explanation was not provided. The graph provided in the March 2022 unplanned repair discharge notification form and the maintenance discharges report provided in Appendix iv of the annual report does not match up. The graphs are very hard to interpret and do not adequately link to the consent conditions.

I consider this to be non-compliant and request that a clear analysis is undertaken for future events.

Condition 9 requires that on the day of the commencement of the discharge the consent holder shall install and maintain signs that indicate a health warning and advise that the immediate area has been recently polluted by treated wastewater. These signs shall remain in place for a minimum of 48 hours after the cessation of the discharge. For the discharge commencing 11 January 2022, and 08 March 2022 I received notification or evidence that this condition is compliant with condition 9.

Condition 10 requires the consent holder to notify 48 hours in advance (if practicable) of any planned/unplanned repair work commencing, or no later than 8 hours after the commencement of an unplanned repair. The emails sent by Wellington Water communicating the unplanned repairs are compliant with this condition.

Condition 11 requires that within two working days of the discharge stopping, the consent holder shall submit details of each discharge event in a suitable format.

- On 27 January 2022, Joemar Cacnio provided this report to notifications@gw.govt.nz and healthprotection@huttvalleydhb.org.nz, but not rec-wq@gw.govt.nz. This report was not provided within 2 working days and is therefore non-compliant with condition 11.
- On 28 March 2022 this report was provided by Julian Villada (Veolia) to notifications@gw.govt.nz and healthprotection@huttvalleydhb.org.nz, however, this was not provided to rec-wq@gw.govt.nz and was not provided within two working days of the discharge stopping. This is non-compliant with condition 11.

I consider this to be technically non-compliant with condition 11.

Condition 12 requires the flow rate, duration and total volume discharged to the Waiwhetu Stream to be provided in the annual report. This was provided in Appendix IV of the Annual Report and is compliant with condition 12.

Condition 16 requires the sampling collected in accordance with conditions 14 and 15 to be analysed for a list of parameters.

The monitoring results of the Waiwhetu Stream and Hutt River required by conditions 14, 15 and 16 are provided in Appendix IV of the Annual Report. Water quality monitoring for the March event was not available. The report in Appendix IV states that *“monitoring of the water quality in the Waiwehtu Stream and the Hutt River was not undertaken during the emergency repair works and wastewater discharge on the main outfall pipeline at 48 Seaview Road in March 2022, although that is a requirement of the discharge permit”*.

Failure to sample is technically non-compliant with conditions 14, 15 & 16.

Please ensure you conduct this sampling for every event it is required for. You have received an Advisory Notice and Formal Warning for this.

Condition 18 requires that the discharge shall not result in any of the following effects on the water of the Waiwhetu Stream 100 m downstream and upstream of the Waiwhetu Stream Outfall:

1. The production of any conspicuous oil or grease or grease films, scums or foams or floatable or suspended materials, or

2. Any conspicuous change in colour or clarity
3. Any emission of objectionable odour, or
4. Any significant adverse effects on aquatic life

Photos are required to show the presence of effects 1 – 4 and any obvious undesirable biological growths or visible die-offs. These are to be provided in the annual report.

Photos were provided in the January – March 2022 Quarterly Report from 11 January until 22 February 2022. These photos are very small and hard to assess. I do not consider the photos provided for the discharge commencing 11 January 2022 meet the requirements of condition 18, this is technically non-compliant.

Discharge of odour from the WWTP (WGN950162 [1492])

GWRC issued Wellington Water Limited with two infringement notices and a formal warning for offensive and objectionable odour beyond the site boundary on 12 July 2021, the odour was recorded on 16 and 18 March 2021. This issue was covered in the previous compliance report, although the infringement notice was issued within this compliance period.

Condition 6 states that there shall be no discharges to air that are noxious, dangerous, offensive or objectionable at or beyond the boundary of the property. These discharges include odour and dust. There were no discharges that were determined to be dangerous, offensive, or objectionable during this reporting period. Therefore, the consent holder is compliant with this condition.

Condition 16 requires the consent holder to keep a record of any complaints received, these complaints shall be forwarded to the manager within 24 hours of receipt. It also notes that the consent holder shall endeavour to record the complaint's name, the time of the incident that caused the complaint, wind direction and speed, and plant operating conditions at the time of the complaint

The annual report notes that 27 odour complaints were received for the annual period. I was generally supplied with these odour complaints; however, they were often not received within a 24-hour period, therefore, I have rated the consent holder as moderately non-compliant with condition 16.

Wellington Water did supply a table detailing the odour complaints received, however, often this did not include the time of the incident, the wind direction and speed or the plant operating conditions at the time of the complaint. Therefore, I consider the consent holder to be non-compliant with condition 16.

Key compliance actions relating to odour during the reporting period include:

- On 05 November 2021, a GWRC environmental protection officer responded to a complaint and conducted an odour assessment at the Seaview WWTP. This included being escorted around the Seaview WWTP. This odour assessment had a character of dried material, was unpleasant and at times was rated as very strong. This was not determined to be offensive and objectionable.
- Between 02 – 08 February 2022, 3 odour complaints were received. During this time, there was emergency maintenance being performed to the sludge drier at the Seaview WWTP. These repairs resulted in partially dried sludge being trucked to the Silverstream landfill.

- On 05 February 2022, a GWRC environmental protection officer responded to an odour complaint by conducting an odour assessment. The character was said to be sewage and at times it had a distinct intensity. This odour was not rated as offensive and objectionable.

Condition 17 requires that any incident that could have caused or has caused adverse effects on the environment at or beyond the boundary of the site shall be notified to GWRC within 24 hours. A written report detailing reasons for the incident, measures to mitigate the incident and measures to prevent reoccurrence shall be forwarded to the manager within 7 days.

On 04 February 2022, Joemar Cacnio emailed GWRC to notify them of process issues at the Seaview WWTP due to a mechanical failure in the dryer. He stated that this may cause odour beyond the site boundary and that Veolia would send an odour notification. A written report detailing reasons, measures to mitigate and measures to prevent recurrence was not provided, therefore, I have rated this as moderately non-complaint.

During this reporting period, WWL and GWRC have had discussions about updating the odour complaints process. In the May 2022 Monthly Meeting Minutes, it is stated that WWL is working on a new odour complaints process that will have an online form and automatic notifications. GWRC would like to continue discussions about updating the odour complaints processes.

You have received a rating of moderate non-compliance for this resource consent because of non-compliance with conditions 16 and 17.

Condition 18 requires that the opacity of all discharges from combustion appliances and the sludge drier shall not exceed 20%. Supplementary information states that since the discharge is directed through a biofilter, the treated air release does not show any opacity. Supplementary information also stated that there were no reported visible air discharges from the plant because the air passes through a biofilter prior to being discharged, this is compliant with **Condition 19**.

Conditions 20, 21 and 22 relate to combustion appliances, incinerators and if discharges are not directed to a biofilter. Supplementary information provided by WWL stated that these conditions were not relevant.

Condition 23 states that all fans extracting odorous air and air containing pathogens shall maintain sufficient negative pressure to minimise fugitive air discharges. An odour assessment was done last July 2021 which involves assessment of the fans extracting odour. Appendix A of the odour assessment shows that the fans were in negative pressure. This is compliant with condition 23.

Condition 24 states that all ducting carrying odorous air shall, be maintained in a good condition and shall be substantially free of gas or liquid leaks. Supplementary information states that since the odour vents have maintained negative pressure, it is understood that there has been no leaks in the ducting works.

Construction of a temporary channel on the foreshore to direct treated wastewater discharged from the scour valves (WGN120142 [31740])

This consent allows the construction of temporary channels on the foreshore to direct treated wastewater discharged from scour valves during main outfall pipeline repairs. There was one unplanned repair in which this consent was required.

An unplanned repair of the main outfall pipeline occurred between 11 January and 21 January 2022. This resulted in scour valves 8, 11 & 12 being utilised.

Condition 3 requires that the extent of foreshore disturbance shall be limited to that required to create a preferential flow path for treated wastewater discharged from a scour valve to the sea. Supplementary information provided by WWL stated that the same contractor (Carsons) has been conducting repairs to the pipe for years and are careful to limit disturbance to the foreshore.

Condition 5 requires that within two days of the discharge ceasing, the consent holder shall recontour the foreshore where the temporary channel was excavated. Supplementary information provided by WWL stated that on 21 January 2022 the foreshore was restored to its natural contour.

Conditions 6 and 7 require certain procedures to be followed which will reduce the effects on water quality. Supplementary information provided by WWL stated that Carsons (the contractor) are aware of the requirements and follow them responsibly.

Infiltration and stormwater ingress (WGN050359 [24539])

Condition 19 requires the Consent Holder to investigate ways and means of minimising infiltration and stormwater ingress into the sewerage system and provide GWRC with an annual report on progress by 31 July. This report was provided in appendix ii of the annual report and considered compliant with this condition.

The annual report details the works undertaken and notes:

- The Stokes Valley Inflow Survey commenced in 2020 and was completed in July 2021. Various drainage faults were identified and resolved, subject to funding, post rehabilitation monitoring will be undertaken to confirm this.
- An inflow survey is currently in progress in Maungaraki for the 2020/21 reporting period;
- The Hutt Central Catchment is planned for the 2022-2023 financial year.
- Smoke/dye testing and CCTV inspections for both wastewater and stormwater assets were completed at Wainuiomata, Harcourt Werry Drive at Percy Cameron Street and Waiwhetu Stream at Tilbury.
- There were no inflow surveys completed in 2021/2022 by UHCC. The proposed catchment for inspection in 2022/2023 will be confirmed after UHCC review their monitoring data.
- A short-term flow monitoring project was completed in 2021-2022 financial year in the Silverstream and Pinehaven catchment.
- The Hutt City Council listed 8 capital projects for wastewater undertaken in 2021/2022.
- The Hutt City Council listed 14 Capital projects for wastewater in 2022/2023
- The Upper Hutt City Council listed 2 capital projects undertaken for wastewater in 2021/2022
 - Wastewater Manhole Cover Improvements
 - Logan St Wastewater Renewal

- The Upper Hutt City Council listed 3 capital projects for wastewater planned for 2022/2023.
- A range of Very High Critical Assets condition assessments were completed on the network using CCTV and other inspection techniques, such as laser profiling.

Trade waste

The Trade Waste Report was received on 30 July 2022, as required under **Condition 20**. The purpose of this report is to manage trade waste flows into the system to minimise the risk of disruption to the wastewater treatment process. It is considered that this report fulfils the requirements of **Condition 20**. The trade waste report states:

- 35 incidents of significant non-compliance were reported during this period. Significant non-compliance includes samples that exceed double the consented limits (excluding pH).
- WWL stated that there are no ongoing effects from this non-compliance and trade waste staff are monitoring sites and subsequent samples for ongoing compliance. However, this non-compliance is causing an increase in the risk of adverse environmental effects.
- No trade waste consented sites have had significant environmental pollution events reported during this financial period.
- No WWTP contamination issues are known to be reported to the trade waste team during the reporting period.
- A total of 1346 premise inspections took place over the 2021 – 2022 annual period.

Tangata Whenua Values Monitoring Plan

Conditions of consent on WGN120142 [33406], [33407] and [33408] require the Consent Holder to develop a Tangata Whenua Values Monitoring Plan (TWVMP) in accordance with the Tangata Whenua Values Monitoring Scope, developed by GWRC.

Development of the TWVMP has been stalled. GWRC needs to provide further information for this to proceed. On 19 January 2023, Joemar Cacnio emailed me stating he believes Wellington Water is waiting on GWRC's Tangata Whenua values monitoring scope so they can develop a plan in accordance with the relevant conditions.

Because of this, I have rated the consent holder as compliant with this condition.

I note that GW will be arranging a hui with WWL and mana whenua this year to discuss what the development of a TWVMP will look like.

Consultation group (WGN120142 [33406], [33407] & [33408])

A consultation group is required to be set up by condition 4 of WGN120142 [33406], condition 10 of WGN120142 [33407] and condition 7 of WGN120142 [33408]. A consultation group has been set up in the past. However, the consent holder has noted that no consultation group meeting was held for this annual period. On 15 December 2022, I emailed Joemar Cacnio (Senior Wastewater Operations and Assets Advisor) requesting that WWL reach out to the interested parties and organise a community liaison group. On 16 December 2022, Joemar Cacnio confirmed that he will do this.

I consider that the consent holder is compliant with this condition because the frequency is determined by the consultation group following the receipt of reports/plans.

Other

WGN930194 (01) [484], WGN930193 (01) [47] and WGN930193 (02) [1369] do not have any reporting or monitoring requirements. Therefore, have not received a compliance rating.

Conclusion

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.

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>★★★★★</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*.