

Seaview WWTP Compliance monitoring assessment

Consent No:	WGN050359 WGN120142 WGN950162 WGN930193 WGN930194	Date: 31 January 2024	Monitoring Officer: Amanda O'Brien
Location:	Seaview Wastewater Treatment Plant		
Activities:	Coastal, freshwater and air discharges as well as coastal marine area (CMA) construction, an occupation of the CMA associated with the operation of the Seaview Wastewater Treatment Plant.		
Period Covered	1 July 2022 to 30 June 2023		

Your compliance rating:


This compliance report covers from 1 July 2022 – 30 June 2023. Joseph Edmonds inspected the site on 20 January 2022. During this reporting period, there were significant non compliances including effluent quality to the main outfall, unconsented dry weather discharges and discharges to air (odour) that were offensive and objectionable.

The Consent Holder and Plant Operators facilitate monthly compliance meetings with GWRC, where on-going compliance issues and progress is discussed. Thank you for facilitating these meetings and keeping GWRC up to date with the operations of the Wastewater Treatment Plant.

The WGN120142 suite of consents were granted in February 2013 with a 5-year duration. While the original expiry date is 2018, WGN120142 is currently operating under Section 124 of the RMA.

WGN120142 [31740] – Construction of a temporary channel in foreshore WGN120142 [33407] Discharges to CMA during repairs		FULL COMPLIANCE All conditions met – well done! No further action required
WGN120142 [33408] Discharge to Waiwhetu Stream during repairs		LOW RISK NON-COMPLIANCE Most conditions met. Some action may be required
		MODERATE NON-COMPLIANCE Some condition(s) not met. Action required
WGN050359 [24539] Main discharge to CMA WGN950162 (01) [1492] Discharge to Air (Odour) WGN120142 [33406] Discharge to Waiwhetu Stream wet weather		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required
WGN930193 (01) [47] WGN930193 (02) [1369] WGN930194 (01) [484]		Not Assessed Conditions of these consents are not annually assessed.

Your overall compliance summary

<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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Comments

WGN050359 [24539] Discharges under normal operating conditions

Management Plans

- Operations and Management Manual (OMM) - Requires update to include chlorine dosing.
- Management plan for the main outfall pipeline – Version 1 (November 2006).
- Combined Main Outfall Pipeline Contingency Plan and Public Notification Strategy – Version 4 (December 2021).

Condition 2 states that the rate of discharge shall not exceed 3,100 l/s or 268,00 m³/day. The discharge was well below the consented limit with effluent discharges between 42,831 m³/day and approximately 125,000 m³/day. These conditions are compliant.

Condition 6 requires the consent holder to sample treated wastewater daily at the outlet of the disinfection bank, prior to entry into the main outfall pump station as specified in **condition 7**. The samples shall be analysed as detailed in **Schedule 1**. The consent holder is compliant with undertaking these samples. These conditions are compliant.

Conditions 9 and **Condition 10** provide effluent quality standards and the requirement to notify GWRC and regional public health if a running geometric mean and/or 80 percentiles calculated daily from the monitoring programme exceeds the stipulated value (for cBOD₅, suspended solids and faecal coliforms) for more than three consecutive days. **Condition 9** is significantly non-compliant.

Parameter	Condition 9: 90-day geometric mean and 90-day 80th percentile	Condition 10: Notification to GWRC and Regional Public Health after 3 days
cBOD ₅	Compliant	N/A
Suspended Solids	Compliant	N/A
faecal coliforms	Significantly non-compliant	Compliant

On 28 September 2022 abatement notices (A1026, A1027, A1028, A1029) to immediately cease the discharge of non-compliant effluent quality and to continue to comply thereafter.

Faecal coliform standards were continuously exceeded the faecal coliforms 80th-percentile Limit of 5000 cfu/100 ml between 1 July 2022 and 1 August 2022 and again between 13 November 2022 and 16 May 2023 as well as the geometric limit between December 2023 and March 2023. A summary of compliance:

- On 28 September 2022 infringement notices for the discharge of non-compliant effluent quality, which is an offence under section 15 (1)(a) of the Resource Management Act 1991 were issued. These were issued in response to non-compliant faecal coliform effluent results in the previous reporting period.
- On 22 November 2022, during this reporting period, GWRC were notified by email from Jemar Cacnio (Senior Wastewater Operations and Assets Advisor, Wellington Water Limited), that the faecal coliform 90-day 80th percentile had been exceeded as of 13 November 2022 (this reporting period).
- On 31 January 2023, GWRC received the quarterly report from 01 October to 31 December 2022 which contained records of non-compliant effluent and on 17 April 2023, received the Seaview WWTP Effluent Quality Monitoring Results which contain data until 10 April 2023.
- Infringement notices I898, I900, I902 and I904 were issued on 27 April 2023 for the breaches of the Resource Management Act 1991 (RMA) to each Hutt City Council, Upper Hutt City Council, Wellington Water Limited and Veolia Water Services Limited for non-compliance of condition 9 of WGN050359 [24539] and Infringement notices I899, I901, I903 and I905 were issued on 27 April 2023 for breach of abatement Notices A1027, A1028, A1026 and A1029 respectively for non-compliance between 13 November 2022 and 10 April 2023.
- The annual report received on 31 July 2023 stated five causes for the reduction in UV disinfection and faecal coliform non-compliance during this reporting period including:
 - Algae build up around UV lamps.
 - Failure of a post-UV weir gate drive early in the FY22/23 that affected accurate level control and hindering the disinfection effectiveness of the UV system. Repaired in early 2023.
 - A failed ballast was identified in the UV system and replaced in December 2022
 - Significant wet weather events elevate faecal coliform levels
 - In November 2022, a large petrochemical contamination entered the plant from the catchment and negatively impacted the treatment process, especially the UV system.
- Effluent continued to be non-compliant until 16 May 2023. No further enforcement will be undertaken for this extended period (11 April to 16 May). Faecal coliform standards come back into compliance on 16 May 2023.

On 08 April 2022, Stantec provided a response on behalf of WWL that 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. CIP Chlorine dosing was identified as a viable solution to mitigate against the algae.

- On 26 June 2023 GWRC assessed the information and reporting from the summer 2023 period and sent an approval memo to use chlorine dosing in general accordance with the consent. The operational plans are required to be updated to ensure compliance of chlorine dosing is achieved against the RMA.

Condition 11 requires samples of effluent to meet specific standards for a range of heavy metals and other contaminants monthly. This condition and is compliant.

Condition 13 requires the consent holder to collect receiving water coastal water samples at seven locations monthly between November to April and analyse these for faecal coliforms and enterococci bacteria. The sampling was undertaken in accordance with these conditions for 5/6 months with January not being sampled due to site access issues. This condition is technically non-compliant due to failure to sample in January.

Faecal coliforms and Enterococci concentrations were low across the 6 months with the highest recorded faecal coliforms of 100 cfu/100ml on 15 March 2023 at Fitzroy Bay 100m SE of Outfall.

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 (s127) will be necessary. Discussions regarding this change of conditions have been initiated and are ongoing. This condition is a technical non-compliance.

Condition 17 requires the consent holder to submit quarterly reports, and **Condition 18** requires the consent holder to submit an annual report by 31 July each year. GWRC received all quarterly reports and the annual the report was received on 31 July 2023. It was agreed with GWRC, the last quarterly report can be combined into the annual report. While reporting could be improved to provide more context, these conditions are compliant.

In Appendix IV of the annual report, WWL provided the assessment titled: *Seaview Wastewater Treatment Plant Assessment of Effects of Wet Weather Overflow Discharges and MOP maintenance discharges of treated wastewater to Waiwhetu Stream*.

Condition 19 requires the consent holder to investigate ways and means of minimising infiltration and stormwater ingress into the sewerage system. The Inflow and Infiltration Report was provided in appendix ii of the annual report and considered compliant with this condition.

Of note the report states the inflow survey work in the Maungaraki catchment is in progress within the reporting period and Hutt Central was planned to commence in 2022-23 period. The drainage investigation team completed smoke/dye testing of 216 assets and CCTV inspections of 154 assets in Wainuiomata, Harcourt Werry Drive and Waiwhetu Stream at Tilbury, however it is unclear what period this covers. Capital projects in this reporting period and the next reporting period show dedicated ongoing investment in improving both the stormwater and wastewater network.

Condition 20 states the consent holder shall take reasonable steps to monitor and manage trade waste inflows into the sewerage system. The Trade Waste Report was received on 31 July 2023.

Of note the report states 36 incidents of significant non-compliance were reported where samples exceed double the consented quality limits (excluding pH). There are no ongoing effects from this non-compliance, however it does increase environmental risk. A total of 1212 premise inspections took place over the 2022 – 2023 annual period, 134 less than the last reporting period.

There were no reported (or confirmed) significant environmental pollution events from consented sites, however, there were two WWTP contamination issues reported to the trade waste team regarding unacceptable and unexpected amounts of petrochemical material with the treatment process. Investigations were undertaken but no clear site has been confirmed to have caused the discharge.

Even though significant issues were caused by trade waste input, reasonable steps were undertaken to identify the source. This condition is compliant.

Condition 22 requires the permit holder to submit an annual report for the main outfall pipeline. This was supplied within the Annual Report.

There was one unplanned and permanent repair on 22 September 2022 and Wellington Water undertook planned maintenance of the Main Outfall Pipeline near Seaview commencing 29 May 2023 to complete a permanent fix to a leaking internal pipe joint after an initial temporary repair last December (15/12/2022). This condition is compliant.

Condition 24 requires the consent holder to advise the manager of any work planned in the next 12 months to repair or replace the pipeline. No repairs were noted in the annual report for the 2023-2024 reporting period.

Upcoming condition requirements

- **Condition 15** requires the consent holder to undertake a survey of marine subtidal communities. The next survey is due in 2024.
- **Condition 25** requires a Monitoring and Technology Review Report. The next review report is due in August 2025.

WGN120142 [33406] Discharges to Waiwhetu Stream under wet weather conditions

Condition 2 states that only secondary treated and UV-disinfected wastewater is to be discharged to the Waiwhetu Stream via the Seaview WWTP outfall when flows exceed 1520 L/s and the storm tank is fully utilised. Condition 2 is significantly non-compliant.

- There were 26 discharges to the Waiwhetu Stream. While there is no consented frequency, the frequency of overflow events over the past 4 years has been 12, 16, 14 and 19 events, considerably higher than the long-term average of 4 events per year.
- There were 19 discharges to the Waiwhetu that occurred during the reporting period where flows exceed 1520 L/s and the storm tank is fully utilised (wet weather), and 2 relating to maintenance/repairs/leaks.
- There were 5 unconsented discharges to the Waiwhetu Stream (dry weather) that was non-compliant with condition 2, as the discharges were not related to wet weather events or maintenance/repairs/leaks.

On 09 December 2021 GWRC issued Abatement Notices A998, A999, A1000 and A1001 to Wellington Water Limited, Veolia New Zealand, Hutt City Council and Upper Hutt City Council, to cease unauthorised dry weather discharges immediately and comply thereafter. Dry weather discharges are a direct non-compliance of abatement notices. During this reporting period:

- On 17 July 2022 there was a 36-minute dry weather discharge due to instrumentation failure within the plant.
- On 23 November 2023, there was a 3-minute discharge to the Waiwhetu stream. This has not been provided in the annual reporting; however, a discharge report was provided. On 21 December 2022 a please explain was issued to Wellington Water.
- On 23 Feb 2023 there was an 11-minute dry weather discharge due to a power outage. The UV system went off and undisinfecting effluent was discharged into the Waiwhetu stream. On 24 April by email, a please explain was issued to Wellington Water.
- On 02 March 2023 there was an 8-minute dry weather discharge due to electrical failure within the plant and undisinfecting effluent was discharged into the Waiwhetu stream. On 06 March 2023, a please explain letter was issued to Wellington Water.
- On 14 March 2023 there was a 7-minute dry weather discharge due to power outage and undisinfecting effluent was discharged into the Waiwhetu stream. The 14 March 2023 unconsented discharge was not notified until 23 March 2023, during a monthly meeting to discuss compliance. Questions were raised during this meeting for explanation.

In each case, Wellington Water provided detailed responses to the requests for information. Sampling results confirmed that the short durations resulted in low effect on the receiving environment. The response noted that power spikes were outside of Wellington Waters control and investments undertaken to reduce the issue and improve resilience through:

- Back-up generator faulty components replaced,

- The current AC drive replacement project designed to improve the response of the effluent pumps - estimated to be completed by the end of March 2023,
- engaging a consultant to undertake an electrical investigation to improve the plants resilience to power spikes and brownouts,

GWRC have taken into consideration WWL's response, and a formal warning was issued to Wellington Water Limited, Veolia New Zealand Limited, Upper Hutt City Council and Hutt City Council on 08 November 2023 for the dry weather discharges.

In accordance with **condition 4** a consultation group is required to be set up. During the reporting period a community Liaison Group meeting was held on 28 March 2023. This condition is compliant.

Condition 5 requires the consent holder to develop a Public Notification Strategy. The current Public Notification Strategy was updated on December 2021 (a combined report with the Main Outfall Pipeline Contingency Plan). The consent holder has been operating in accordance with this strategy during the reporting period.

Conditions 6 and **condition 7** require the consent holder to notify GWRC and regional public health 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 notification within 8 hours of a discharge commencing, however, there was one instance where notification was not received and non-compliant.

- Notification was not received about the 14 March 2023 discharge until 23 March when it was mentioned in a monthly meeting. This was an unconsented dry weather discharge.

Detailed reporting of discharge events were received within the two-day period during this reporting period and there was good coverage of information including Waiwhetu stream and discharge graphs.

Condition 9 requires the consent holder to monitor flow rate, duration, and total volume discharged from the treatment plant for all overflows and **Condition 10** requires the installation and operation of a flow sensor in the Waiwhetu Stream to continuously monitor flow during a discharge event. This information was provided during discharge reporting. This condition is compliant.

Condition 11 and **condition 12** state the sampling requirements during each day of discharge and one day after. Sampling results were provided in the quarterly reports. There were 19 wet weather overflows in the annual report period with 15 discharges fully complying with the sampling requirements.

Four discharge events were non-compliant with condition 11 and condition 12. It is noted that all events were sampled, however, on 8 July 2022, 9 July 2022, 19 November 2022, and 19 April 2023 one sample was not taken in each case.

Condition 14 states the parameters the samples taken during an overflow need to be analysed for and requires an assessment of the results be provided in the annual report. This has been provided in Appendix IV of the Annual Report. Condition 14 is compliant.

Of note the assessment of results showed there was no observable difference in water quality between upstream and downstream Waiwhetu Stream Sites and;

- Very high concentrations of faecal coliforms, E. Coli and enterococci were recorded in the treated wastewater. Median concentrations were similar across sites, however, 95 percentile concentrations were higher downstream.
- pH was above the guidelines at Site B and Site C for 36 of the 42 samples (both upstream).
- 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 / downstream) 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.

Condition 15 requires the discharge to not result in the listed effect and the consent holder to provide photographs of the discharge. This condition is 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 or planned/unplanned repair works. This condition is compliant.

Condition 17 through to **condition 21**, requires the Consent Holder to develop and submit a Tangata Whenua Values Monitoring Plan (TWVMP) in accordance with the Tangata Whenua Values Monitoring Scope (TWVMS), developed by GWRC. Development of the TWVMS has stalled, therefore Wellington Water Limited is unable to continue with development of their plan in accordance with the relevant conditions. This condition is assessed as compliant for this reporting period.

While technically compliant, this condition was intended to be in place in 9 years ago, and consideration around the outcomes of the intention of this condition need to be addressed.

Condition 24 relates to detailed investigations to reduce adverse effects from discharges and **Condition 26** relates to submission of an options assessment. A report covering these conditions was received in August 2017.

WGN120142 [33407] Discharges to the Coastal Marine Area due to leaks and maintenance

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. During the two repairs to the main outfall pipe, records show that the wastewater was fully treated, therefore, compliant with condition 2.

Condition 4 states 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 and **condition 5** states planned work must be undertaken between 5 May and 5 July. This condition is compliant:

- On 22 December a minor leak on the Seaview Outfall pipeline approximately 1 km south of Burdan's gate in Eastbourne. This discharge was classified as minor and was scheduled for planned repairs between 05 May and 05 July 2023.
- On 22 September 2022 a leak from the Seaview WWTP Main Outfall Pipe (MOP) at 356 Muritai Road Eastbourne was discovered. This was an unplanned but permanent repair. E.Carson's commenced clearing scours 11, 12 and 13 of beach debris at 1:15pm on 22 September. Scour valves were opened on 22 September and closed on 24 September. Scour 1 was re-opened on 24 September when the leak was not resolved.
- On 29 May 2023, the planned repair, identified on 22 December 2022, was undertaken. Scour valves were opened on 29 May.

Condition 6 states that steps are to be taken to minimise ponding so as far as practicable treated wastewater drains freely to the Wellington Harbour. No ponding was reported, and photos show discharge freely flowing to harbour.

Condition 7 relates to where temporary repairs are made; a permanent repair is undertaken within 12 months. This condition is compliant.

Condition 12 requires the consent holder to notify GWRC of any planned and unplanned repairs 48 hours in advance of any planned repair work commencing or no later than eight hours after the commencement of a discharge associated with unplanned repairs. Both the unplanned repair and planned repair were communicated. This condition is compliant.

Condition 13 requires the consent holder to ensure notification signs are installed and maintained as close as practicable to the scour valve discharge location. This condition is compliant.

Condition 14 requires the consent holder to notify GWRC of the number of scour valves used in the discharge events and a description of the immediate receiving environment. This condition is compliant. A summary of information received was:

- For the unplanned repair commencing 22 September 2022, scour valves 1, 8, 9, 11, 12 and 13 were opened. Scour valve 13 was empty. Due to its position, scour valve 9 was designed and constructed to drain into a pit and then to be pumped into the storm water system along Karamu St to the beach.
- For the planned repair commencing 29 May 2023 scour valves 11, 12 and 13 were used to drain the pipe back to the inlet works of the plant.

- For both repairs, scour valve 10 is avoided as this location discharges out onto mussel beds.

Condition 15 relates to notification of a leak being identified and **Condition 16** states a site-specific repair plan being submitted within 7 days. One leak was notified during the reporting period, a site-specific plan was to delay for a permanent repair. This condition was compliant.

Condition 17 and **condition 18** requires that discharges associated with planned and unplanned repairs, shall not result in any of the listed effects on the water of Wellington Harbour beyond 30 m radius of each scour valve and pipeline leaks associated with minor and/or temporary leaks, beyond 10 m radius from the discharge point. Photographs were sporadic in nature. No effects listed were noted at any of the locations where the effluent was discharged.

Condition 19 requires that during the 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. No discharge occurred during the summer period.

Condition 28 relates to the consent holder undertaking investigations to reduce the frequency of pipeline leaks. Most investigation work has been completed; however, the investigations shall continue for the duration of the consent and be reported in the annual report. No information was provided in the annual report.

Condition 30 requires a detailed summary of repairs undertaken on the pipeline in the last 12 months by 1 August each year. The annual report states the start and end times along with the location of these unplanned repairs on the main outfall pipe.

WGN120142 [33408] Discharges to Freshwater associated with leaks and maintenance.

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 repairs to the main outfall pipe, records show that under this consent the wastewater was fully treated, therefore, compliant with condition 2.

Condition 4 and **Condition 5** requires that discharges to the Waiwhetu Stream associated with unplanned repairs occur between 05 May and 05 July each year and for a maximum period of six weeks and a maximum period of 2 weeks per event. These conditions are compliant.

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

- On 22 September 2022 a leak from the Seaview WWTP Main Outfall Pipe (MOP) at 356 Muritai Road Eastbourne was discovered. This was an unplanned but permanent repair. This discharge began at 2:27 am on 22 September 2022 and ceased 7 days later, on 30 September 2022. The discharge volume for this event was 370,536 m³.
- On 29 May 2023 there was a planned permanent repair to the Seaview WWTP Main Outfall Pipe (MOP). The discharge to the Waiwhetu Stream began on 8:28 am on 29 May 2023 and ceased 11 days later, on 9 June 2023, resulting in 578,486 m³ of fully treated effluent being discharged into the Waiwhetu Stream.

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. Discharges occurred over several days for both events. Once the storm tank is full, then it is necessary to discharge to the stream on a flood tide. Graphs show that discharging on the ebb tide was undertaken as far as practicable by using the storm tank to manage the flow, particularly once the repairs had been completed.

Condition 9 requires installation and maintenance of signs at the specified locations on the day of discharge and for a minimum of 48 hours after the cessation of the discharge. This condition is compliant.

Condition 10 requires the consent holder to notify 48 hours in advance of any planned repair work commencing, or no later than 8 hours after the commencement of an unplanned repair. This condition is compliant.

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. Information shall be sent to GWRC and regional public health. This condition is compliant.

Condition 12 and **Condition 13** requires the flow rate, duration and total volume discharged to the Waiwhetu Stream to be monitored and provided in the annual report. This is the same flow meter as required under condition 9 of **WGN120142 [33406]**. Data is provided in Appendix IV of the Annual Report. This condition is compliant.

Condition 14 relates to the requirement to grab samples of treated wastewater each day the discharge occurs, and **Condition 15** requires grab samples of Waiwhetu Stream / Hutt River water three times per week and one day after the discharge has ceased and **condition 16** states what the samples are required to be analysed for.

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. It is noted that samples were taken daily. Hutt River sampling was not

undertaken on 29/09/2022, the day following the discharge. It is unclear why these samples were not taken, however, consideration in the consent is given for H&S when taking Hutt River samples.

Condition 18 requires that the discharge shall not result in effects on the water of the Waiwhetu Stream 100 m downstream and upstream of the Waiwhetu Stream Outfall. Photos are required to show the presence of effects in condition 18 and any obvious undesirable biological growths or visible die-offs.

No photos were provided for 22 September 2022 through to 30 September 2022. Photos were provided for 30 May 2023 to 09 June 2023 in the annual report. Thank you for providing these in large format. Foam was present on 02 June, 03 June and 04 June 2023 at the downstream Waiwhetu Stream location (Port Bridge) and not present at Bell Road Bridge (Upstream). Photos of the discharge location should also be provided. This condition is non-compliant.

Condition 33 relates to detailed investigations to reduce adverse effects from discharges and **Condition 34** relates to submission of an options assessment. A report covering these conditions was received in August 2017.

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

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 and **condition 5** requires that within two days of the discharge ceasing, the consent holder shall recontour the foreshore where the temporary channel was excavated.

- E.Carson's commenced clearing scours 11, 12 and 13 of beach debris at 1:15pm on 22 September. Scour valves were opened on 22 September and closed on 24 September. Scour 1 was re-opened on 24 September when the leak was not resolved.
- On 29 May 2023, the planned repair, identified on 22 December 2022, was undertaken. Scour valves were opened on 29 May.
- Contractor (Carsons) has been conducting repairs to the pipe for years and are careful to limit disturbance to the foreshore. Additional photos of contouring after scours valves have been closed should be provided in the future.

Conditions 6 and 7 require certain procedures to be followed which will reduce the effects on water quality. No complaints or reports were noted that related to these conditions. This condition is compliant.

WGN950162 [1492] Discharge of odour from the WWTP

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.

On 14 June 2021 GWRC issued Abatement Notices A956, A957, A958 and A959 to Wellington Water Limited, Veolia New Zealand, Hutt City Council and Upper Hutt City Council, to cease the unauthorised discharge of contaminants, namely offensive and objectionable odour, to air at or beyond the boundary of the property immediately and comply thereafter.

During this reporting period there was offensive and objectionable odour beyond the boundary. This condition is significantly non-complaint. Key compliance actions include:

- On 29 August 2022 and 17 October 2022 odour assessments was undertaken and deemed offensive and objectionable.
- On 16 December 2022 an odour assessment was undertaken by a GWRC enforcement officer on, which was deemed offensive and objectionable. GWRC sent a please explain request to Wellington Water Limited in response to complaints received on 22 November 2022, 16 December 2022 and 19 December 2022 and a response was provided via email on 23 January 2023. The main cause from 22 November odour was likely related to an emergency drier shut down from 19 - 25 November (from unexpected disposal of petrochemical product into the wastewater network) and sludge being taken to Silverstream landfill. The response stated there were no unusual activities happening at the Seaview WWTP on 16 December 2022 that could have caused any odour.
- An odour assessment was carried out on 17 January 2023 by a GWRC enforcement officer in response to a complaint. The officer confirmed that the odour was offensive and objectionable and was coming from the sludge drying unit. This assessment was carried out within the designated odour boundary so not further enforcement action as taken. An investigation into the odour boundary at the southern end of the WWTP is underway.
- After receiving odour complaints on both 31 January 2023 and on 9 February 2023, in the opinion of enforcement officers who assessed the odour at SWWTP, the odour beyond the boundary of Seaview Wastewater Treatment Plant was objectionable and offensive. Infringement notices (IN1906, IN1907, IN1908, IN1909, IN1910, IN1911, IN1912 and IN1913) for unauthorised discharge of odour under section 15(1)(c) of the RMA 1991 and breach of abatement notices A956, A957, A958 and A959 were issued to each Wellington Water Limited, Veolia New Zealand, Hutt City Council and Upper Hutt City Council.
- On 05 March 2023 odour assessments was undertaken and deemed offensive and objectionable.

Condition 11 relates to the preparation of an environmental management plan to demonstrate how conditions in the consent will be met. This management plan is recorded in the contact management plan with Veolia (reviewed annually) and the Operations and Management Manual.

Condition 15 relates to the monitoring of air-borne pathogens to demonstrate compliance with **condition 6**. No agreed ongoing monitoring frequency was set. In January 2024 WWL have requested Veolia to test as soon as practicable, which should occur in the next reporting period. An ongoing monitoring frequency will be agreed with GWRC once results have been assessed.

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. The annual report notes that 24 odour complaints were received for the annual period including from Members of the community, Veolia and GWRC. I have rated the consent holder as non-compliant.

- I was generally supplied with these odour complaints; while, they were often not received within a 24-hour period, these have been provided when requested.
- Complaints did not include the time of the incident, the wind direction and speed or the plant operating conditions at the time of the complaint. Subsequent follow up emails did provide some of this information.

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. This condition is moderately non-compliant.

- These have been notified on occasion, however, maintenance that has resulted in complaints has not been received and it is expected more than 2 maintenance activities have occurred that could have caused odour. Notification received include:
 - Sludge loadout 6-8 September 2022
 - Planned maintenance of the trade waste pump station at Seaview WWTP 25-29 September 2023
- A specific written report detailing reasons for the incident have not been received for any incidents. Email correspondence and monthly meetings between GWRC, Veolia and WWL has improved the understanding of reasons for actual and potential incidents compared to previous reporting periods.
- It is recommended that a written report is provided to ensure maintenance activities are carried out in accordance with its consent and any improvements can be identified.

During the previous reporting period, WWL and GWRC have had discussions around updating the odour complaints process. GWRC would like to continue discussions about updating the odour complaints processes.

Condition 18 requires that the opacity of all discharges from combustion appliances and the sludge drier shall not exceed 20 %. This condition is compliant.

Condition 19 states that there were no reported visible air discharges from the plant. Since the discharge is directed through a biofilter, the treated air release does not show any opacity and no visible air discharge have been noted except from the odour canon (odour mitigation) during this reporting period. This are considered compliant.

GWRC requested WWL complete a rules assessment, which was undertaken in April 2023. This assessment identified the odour mitigation measure of using an odour canon was not a permitted activity.

There is no specific rule that permits its discharge and as such the activity will default to the discretionary activity rule R42.

While conditions 11 to 13 [of consent WGN950164], which relate to the preparation and update of operations management plans for the management of odour discharges from the facility, the use of odour cannons and the discharge of chemicals to mask odours where not part of the facilities design and therefore the proposed activity is not in general accordance.

GWRC advise that the odour canons require resource consent to operate, however, no enforcement action will be pursued for previous use or on an interim basis (unless consent is not sought), as advice from the Regional Public Health assessment states that there is no public health concern. The use of the canons must still be compliant with visual requirements in condition 18.

Condition 23 states that all fans extracting odorous air and air containing pathogens shall maintain sufficient negative pressure to minimise fugitive air discharges.

The June 2023 Odour Investigation report by Air Quality Consulting NZ notes the dryer building was under slight negative pressure 5 -10 Pa. It was noted that one roof fan was not operational, however, STNZ air flow checks appeared to be within expected values. STNZ noted gaps around cyclones and roof which is a potential pathway for odour.

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.

Evidenced in the June 2023 Odour Investigation report there was corrosion on steel structures around covers, evidence of the seals along the edges of the Primary Sedimentation Tank corrugated iron covering missing/deteriorated and around the flange indicates leaks/lack of negative pressure in the Primary Sedimentation Tank headspace. This condition is significantly non-compliant.

Condition 25 states that all biofilters shall be designed to ensure gasses are effectively dispersed throughout the filter bed, the sides are designed and constructed to ensure gasses cannot bypass the media and ensure sufficient redundancy to allow maintenance to be carried out on the bed without breach of **condition 6**.

The June 2023 Odour Investigation report states that the biofilter size and capacity are consistent with industry good practice. The report attributes a moderate source of odour to the biofilter rubber seal around fans which are split/leaking on both fans. These have now been replaced. The biofilter was further identified in this report as having a significant source of odour due to:

- Media is being at end of life,
- Significant short circuiting of gas flow (backpressure, pH evidence)
- Evidence of being highly odorous on top of the biofilter
- Evidence of vegetation across top of media (no vegetation should be present)

During a meeting between WWL, Veolia and GWRC on 27 July 2023, the project team was waiting for the biofilter media to be removed so an inspection of the structure can be undertaken. It is understood a delay in removal of the material occurred due to identifying a location to dispose of the media which has been classified as contaminated and the composition of the material to be brought in.

WWL sent a letter to neighbouring residents as part of their communication plan stating “Veolia, will replace the plant’s biofilter media to help reduce odour issues from the site” from 14 November 2023. The letter also

notes that residents may “experience stronger levels of odour than normal and that unfortunately, this is unavoidable”.

We note that odour beyond the boundary is not consented for as condition 25 states that the biofilter must be designed to allow redundancy for maintenance to ensure Condition 6, no odour beyond the boundary, is complied with.

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

<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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