

REPORT: TRADE WASTE MANAGEMENT

ANNUAL CUMULATIVE REPORT

JULY 2024 – JUNE 2025

1. PURPOSE OF REPORT

This report collates the information and data obtained from Hutt City Council's trade waste team while undertaking management of trade waste function for both Lower Hutt and Upper Hutt cities.

Supply of this report is to fulfil condition 20 of Consent WGN 050359; to discharge treated effluent from the Seaview wastewater treatment plant.

The condition notes:

The permit holder shall take reasonable steps to monitor and manage trade waste inflows into the sewerage system so as to minimise the risk of disruption to the wastewater treatment process. The permit holder shall provide the Manager, Environmental Regulation, Wellington Regional Council, with an annual report on trade waste which summarises issues arising and actions taken by 31 July.

2. EXECUTIVE SUMMARY

Although dated, the last available total influent data suggests that **5.6% of the average daily flow** at the Seaview Waste Water Treatment Plant (WWTP) is from consented trade waste dischargers.

The liquid waste stream consented dischargers varies greatly in volume, strength and composition.

Using the same total influent data, the trade waste stream at the WWTP accounts for around **10% of suspended solids** (SS) through the plant and approximately **26% of the chemical oxygen demand** (COD) required in the treatment process. This data should be verified against current influent streams at the WWTP, as the data used in this calculation is somewhat dated.

When compared as a ratio to the total influent stream received at the WWTP, all of the trade waste characteristics (flow, COD and SS) are generally tracking slightly downward over a long-term average.

When using data from the last five years however, the trends display a pattern of growth in both flow and COD. Without current WWTP data, it is not possible to know the relationship to total influent flow.

Compliance monitoring through waste stream sampling at consented premises continues to identify a number of non-compliance events; although these are generally rare and none identified during the report period were expected to interfere with the function of the WWTP and waste water network in general.

There were no instances of significant non-compliance with trade waste regulation that caused concern for the health of the waste water treatment process or infrastructure.

No trade waste consented sites have had significant environmental pollution events reported during this period.

During the period covered by this report, **zero** WWTP contamination issues were reported directly to the trade waste team. This is encouraging and is potentially an effect of the work undertaken by staff to educate both the public and commercial/industrial operators within the sector.

3. BACKGROUND

Hutt City Council's trade waste team manages the trade waste function for both Hutt City Council and Upper Hutt City Council; under an internal contract to the Hutt City Council Environmental Protection group.

Management of discharges from commercial and industrial sites forms the core work of the team, however a number of other, related, functions are performed by members of the trade waste team.

Any entity that discharges a non-residential liquid waste to the wastewater network is subject to the conditions of The Hutt Valley Bylaw 2016, and is generally considered to be a trade waste discharger. If the discharge requires any treatment beyond a 'normal' level at the WWTP, that entity is monitored by the trade waste team at some level. Sites (not operators) are licensed for discharge and assessed for risk to the treatment process, which then informs the licensing category that is applied. There are 5 levels of license with an additional factor that can be applied for wastewater that is technically non-compliant with the bylaw, but still acceptable within the treatment process, this is known as a conditional consent. An example of a conditional consent might be a factory that discharges an overall volume of wastewater that is higher than the bylaw allows, but is entirely acceptable within the receiving network - provided flow rates and timings are managed accordingly.

Around 750 premises throughout the Hutt Valley were licensed to discharge trade waste during this period. Each licensee is invoiced an amount annually which reflects the risk category their premises occupies and whether they have a conditional consent condition. Notable clients include water treatment facilities, waste facilities & landfills, breweries, laundries and manufacturers. The majority of the remaining licensees are food premises (~65%) and automotive related premises (~15%).

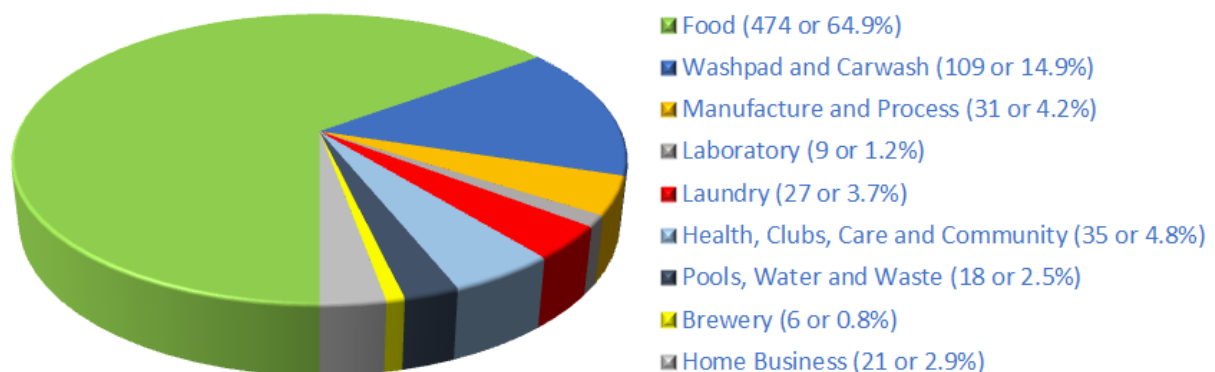


Figure 1: Breakdown of overall discharger type (2024 data)

Generally, dischargers are visited once per year, although many are visited more frequently.

Around **125 licensed dischargers are monitored regularly** via laboratory sampling, with sample analytes and frequencies ranging; depending on risk, variability of waste and compliance history. Verified non-compliant results can be re-sampled at the expense of the discharger.

Significant dischargers are also subject to user-charges, which are calculated by using an averaged sampled strength to inform an approximated cost to treat that waste water stream. The unit cost is multiplied by the strength and the volume to produce a total cost that is due from the client. Only significant dischargers during each period are invoiced.

The overall ratio of business type is fairly consistent through the two cities we monitor, with Lower Hutt having relatively more manufacture, process and automotive outfits, while Upper Hutt has a higher ratio of health, clubs, child care, elder care, after-death care, laboratories and commercial brewing outfits.

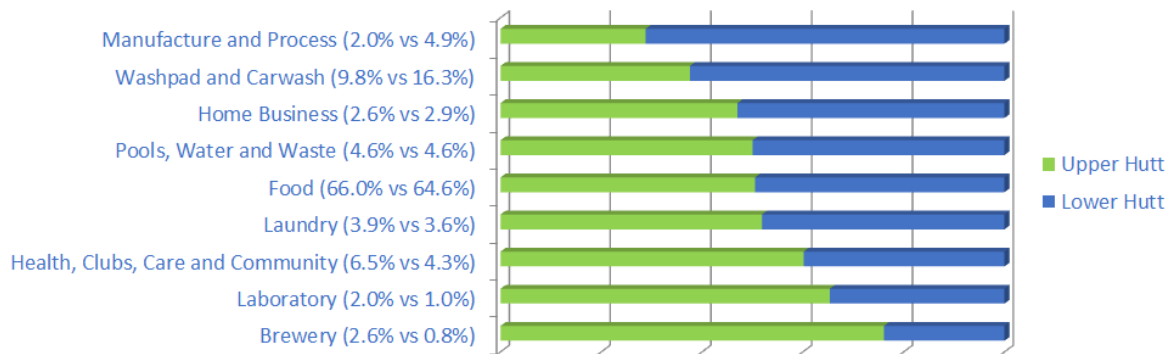


Figure 2: Ratio of total trade waste discharge type (relative to total consents) - Upper Hutt vs. Lower Hutt (2024 data)

4. OVERVIEW

4.1 Loadings

Trade waste contributes a significant portion of the WWTP influent. Trade waste loadings (calculated from the user charges calculations) are presented below:

Period	Daily Volume Avg	Daily SS Avg	Daily COD Avg
July – August 2024	3137	1119	5649
September – October 2024	2984	934	5039
November – December 2024	2725	956	4839
January – February 2025	3898	1049	5119
March – April 2025	3024	926	5151
May – June 2025	3147	1074	5754
Daily Average (Report Period)	3152	1010	5262
Total at WWTP (2017-20 Average)	56775	10297	19978
Trade Waste % 2024-25*	5.56%	9.81%	26.33%
<i>Trade Waste % 2023-24*</i>	<i>5.35%</i>	<i>8.59%</i>	<i>23.56%</i>

Table 1: Trade waste loadings (from user charges). COD not measured in WWTP influent - assumed to be BOD x 2.5

Note that the total WWTP influent data has not been updated in some time, so care should be taken when considering the trade waste stream as a proportion of total influent. As illustrated below, historic data shows a generally downward trend in volumes of trade waste through the WWTP (blue trace), fairly consistent levels of suspended solids (orange trace) and a variable amount of COD (orange trace), including a sharp upward trend present when considering the most recent decade or so alone..

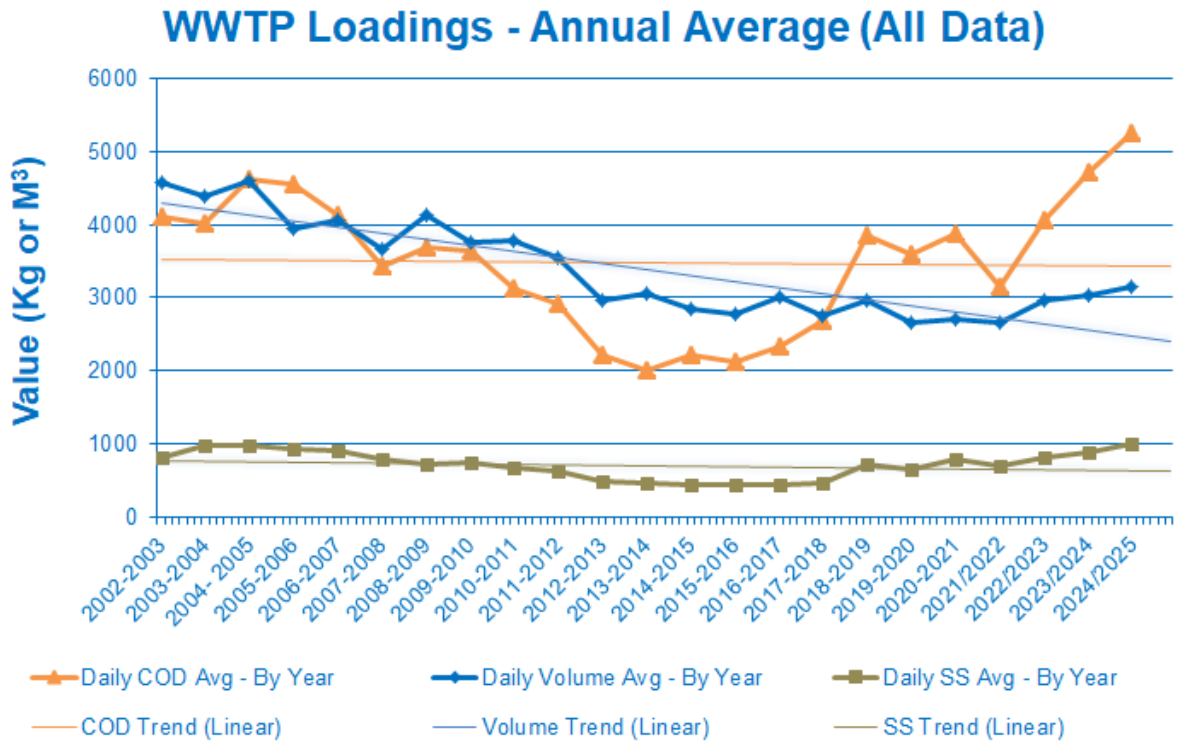


Figure 3: Historic trend of flows, suspended solid content and COD

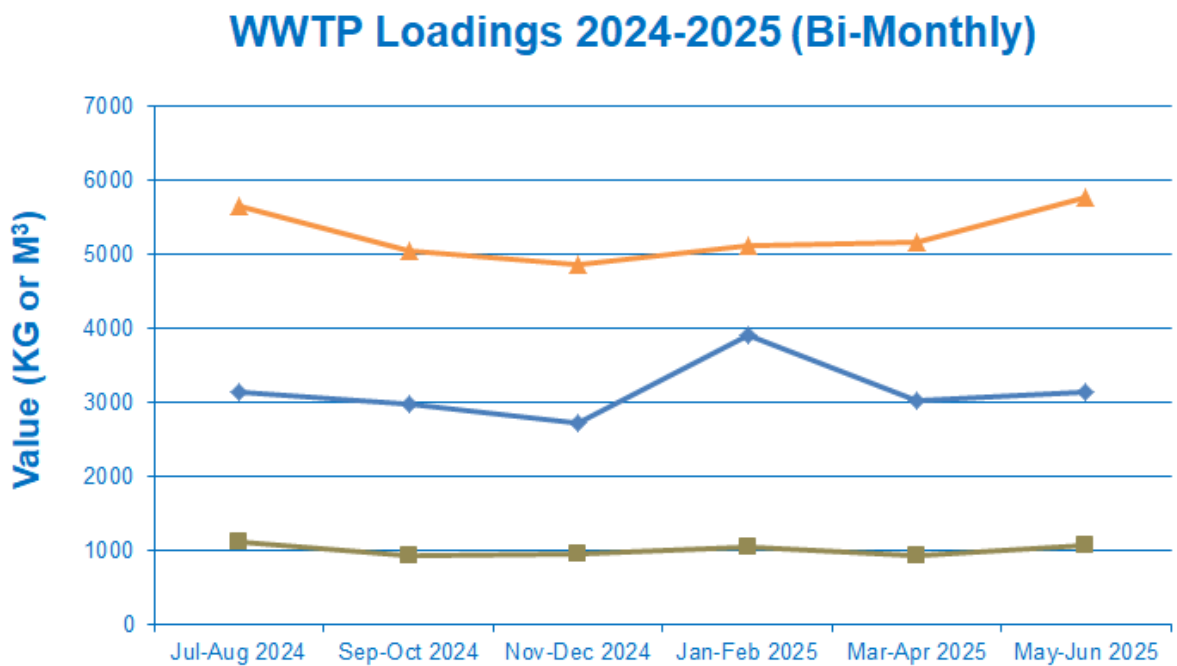


Figure 4: 2-monthly plot of flows (blue), suspended solid content (brown) and COD (orange)

4.2 Sampling

The local sampling team at Eurofins has been excellent in supporting the goals of the team. Increased interaction between the sampling and trade waste teams (both Hutt and Wellington) has been actively fostered through increased facetime and commitments to sharing information and issues as they arise. Direct access between sampling field-staff and Trade Waste Officers has been encouraged and continues to show benefit to all parties. As the sole provider of sampling services in the area, Eurofins have proved to be very responsive and accommodating to requests from the Hutt trade waste team.

Sampling data is being provided reliably, although return times for samples have increased slightly over the report period.

4.3 Site turnover

An expected amount of turnover has occurred during the period with final numbers continuing to increase, as has been the trend for several years. No great variance of numbers has been noted in any type of business in particular, although consented home-caterers are projected to increase in number as we process new and existing businesses.

4.4 Interaction with other teams

The Trade Waste Team has close interaction with both the building and environmental health (food) teams in both Hutt City and Upper Hutt City. These teams often advise us of new and intended businesses, allowing input on any required hardware and process to meet trade waste discharge requirements.

From time to time, there are some failures within this process and we have found ourselves requiring retrospective works to be completed on established sites that we were originally unaware of. Ongoing discussions and workshops have improved this issue somewhat.

5. COMPLIANCE MONITORING

48 incidents of significant non-compliance were documented during the report period. For these purposes, sampled strengths of more than twice consented limits (excluding pH) are considered to be of significant non-compliance.

From the same report period last year, 58 significant non-compliance events were noted. The figure from this year represents an overall drop in significant non-compliance of 17.4%, which is made more notable by the fact that sampling has increased by 142% during this reporting period, achieving 242% of sampling events over the same period last year (see table3, below).

Lapses in food premises grease trap cleaning continues to be a minor, yet consistent, issue amongst a small portion of the food outlets. This is not normally a concern to the treatment plant, but can contribute greatly toward private and public pipe blockages and associated remedial costs. Trade Waste Officers are actively issuing non-compliance notices and charging businesses for recheck visits in an attempt to provide a monetary motivation to achieving compliance.

The type of premises producing non-compliant waste streams tends to vary, with food processing/production, brewing, manufacturing, automotive services, waste processing and takeaway food chains all featuring. Virtually all of the noted non-compliance is thought to have had little notable effect on the waste water network and overall treatment process.

The total of non-compliant samples in the high-volume category is significantly lower than last year, suggesting increased compliance amongst the bigger operators within the sector in general. Also

notable, a significant portion of the non-compliant results are from a limited number of sites – which the team are working closely with to gain compliance.

Period	Non-compliance Incidents where average daily trade waste output volume exceeds 5m ³ /Day	Non-compliance incidents where average daily trade waste output volume is less than 5m ³ /Day
Total 2024-2025	16	32
Total 2023 - 2024	40	18
Total 2022 - 2023	19	17

Table 2: Significant non-compliance *some data may not have been received in time for reporting

Ongoing monitoring, through site visits and sampling procedure (via Eurofins), is carried out by the Trade Waste team. A summary of inspection and compliance monitoring follows:

Period	Visits	Sampling Events
July – August 2024 (2023)	555 (231)	74 (25)
September - October 2024 (2023)	227 (212)	59 (30)
November – December 2024 (2023)	278 (223)	31 (37)
January – February 2025 (2024)	406 (188)	66 (3)
March – April 2025 (2024)	353 (499)	87 (27)
May – June 2025 (2024)	395 (159)	56 (32)
Total 2024 – 2025 (2023 – 2024)	2214 (1512)	373 (154)
Total 2022 – 2023	1212	155

Table 3: Inspection and monitoring

6. NOTABLE SITES

6.1 Brewtown

Now a seemingly permanent feature on annual trade waste reports, Brewtown continues to expand, adding more food outlets and expanding/upgrading existing premises

Tuatara Brewery has recently relocated from Waikanae and is currently fine-tuning their output to better meet compliance guidelines

The market space is being redeveloped to include several permanent kitchen containers, each with a dedicated greasetrap to capture generated waste.

A communal (to client business) washpad is also present at the facility and use is shared, with the site operator monitoring and maintaining the trap as needed.

6.2 Queensgate Night Market

An operator from Auckland is in the process of establishing a weekly night-market in Queensgate. The development will include a shared greasetrapp for all associated food trucks and onsite caterer's use, providing a safe discharge point for those vendors. If the venture is successful, we will look at adopting a requirement for similar market spaces to install a comparable system, reducing the risks associated with these outlets to both stormwater and waste water networks.

6.3 Composting outfit in Upper Hutt

A local business had been processing compost from food waste for some time before coming to our attention. After discussions were held, the business moved to a new site nearby and began processing without any consents (Resource, Building and Trade Waste). UHCC was alerted by concerned residents that experienced an odour. The team at UHCC then advised the Trade Waste Team, who visited site and ordered the operator to entirely cease until consents had been sorted. We await an update on this site and will address concerns about waste water and storm water protection measures as part of the discharge consent process.

6.4 Landfills

The two landfills, Silverstream and Wainuiomata, continue to be amongst the largest dischargers of trade waste by volume.

Silverstream experienced a breach of the leachate line during the report period and contaminated the stormwater settlement pond downstream. The contents of the pond was diverted to waste water to allow safe disposal - no ill-effect was reported by the network operator or WWTP, who were both advised of the issue prior.

Problems with the discharge meters at both landfill sites continue and supplied volume data is non-existent. We continue to calculate flow volumes using averages of previous flow data and rainfall data as part of the charging regime.

6.5 Te Ngaengae

The community pool complex has reopened and returned to previous levels of discharge. An updated filtration system seems to be returning slightly lower strength wastewater, although it has never reached a level on concern – either before or after refurbishment.

6.6 Waste Management Technical Services

Concerns raised last year have been addressed and this client has proven to be compliant over many months due to a change in both staff and process. New local management and chemists seem to be having a positive effect on the quality of the waste stream. Sampling is currently still rather intensive although discussions are being held about winding back sampling requirements due to the ongoing compliance and co-operation from the new staff on site. We continue to monitor the business and value their input on local operator habits. The chemists employed here are also traditionally receptive to deal with after-hours advice and action if there are significant events with unknown or dangerous chemicals.

6.7 Zany Zeus

Zany Zeus (Seaview Road) has changed ownership and continues to trade while upgrading their pre-treatment system to an acceptable standard. The business has committed to continuing the works. We continue to monitor the site through on-site visits, sampling and user-charges.

7. BIOSOLIDS

The Hutt City Council Trade Waste team no longer monitors biosolid performance.

8. CONTAMINATION REPORTS

No reports of WWTP contamination were received during the period, a welcome change from previous years.

9. TRADE WASTE CONSIDERATIONS

Increased numbers food-related home businesses continue to be a feature within the sector.

Business adjacent to Trade Waste needs attention (liquid carriers, cooking oil recyclers etc) to provide life-cycle tracking of waste products.

Cooking oil removal and filter cleaning businesses beginning to pop up as activities intended to be run from residential premises

Schools, community centres, food trailers and home business all need more resource committed to finding viable solutions and protection measures.

10. INFLOW PROJECTS

No inflow projects were completed during this period due to uncertainty around team structure and long-term employment of staff.

Ongoing work in this space is being discussed amongst Wellington Water and Council representatives.

11. OTHER PROJECTS

The team, in conjunction with other teams at Council and Wellington Water, has been discussing the feasibility of a communal dump-point for food trucks and trailers. As a growing sector, these facilities have no permanent, viable solution to deal with collected water while on site. We envisage the provision of communal solutions through the organisers of markets/events as a viable and sustainable solution. Discussions with individual operators are also ongoing and the team is investigating suitable solutions for home use:

12. TRADE WASTE TEAM NEWS

The Trade Waste team restructure, started in 2020, is still underway. Some of the positions have been settled whilst others remain to be on a fixed-term basis, or paid at a lower total reward despite exponential increases to responsibility and workload.

13. APPENDICES

There are no appendices to this report.

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