


Compliance monitoring assessment

Consent No:	WGN060283	Date: 18/10/2021	Monitoring officer: Josh Knowles
Location:	Western Wastewater Treatment Plant, South Karori Road, Karori, Wellington		
Period:	1 July 2020 to 30 June 2021		
Consents:	<p>WGN020236 [22098] Coastal permit to occupy the coastal marine area in respect of the Western WWTP's sewerage outfall structure.</p> <p>WGN060283 [25227] Coastal permit to occasionally discharge milli-screened (partially treated) effluent to the Wellington South Coast coastal marine area (Cook Strait in the vicinity of the Karori Stream Mouth) via an existing outfall during significant weather events.</p> <p>WGN060283 [25230] Discharge permit to discharge contaminants to air from the operation of the Western WWTP.</p> <p>WGN060283 [35255] Coastal permit to continuously discharge disinfected secondary (fully treated) effluent to the Wellington South Coast coastal marine area (Cook Strait in the vicinity of the Karori Stream Mouth) via an existing outfall.</p> <p>WGN060283 [35674] Discharge permit to occasionally discharge secondary treated and disinfected wastewater from the Western Wastewater Treatment Plant to Karori Stream during events when the stormwater tank is full and the flow to the plant exceeds 190 L/s.</p> <p>WGN160340 [34178] Land use consent to undertake works in the bed of the Karori Stream to enable the maintenance of the Western Wellington Wastewater Treatment Plant Main Outfall Pipe including;</p> <ul style="list-style-type: none"> • Clearance of slip or flood debris; • Repairing scoured sections of stream bed and banks which affect the pipeline stability; • Replacement of existing parts of the pipeline and associated structures. • Repairs to fords and river crossings; and • Disturbance and redistribution of bed material, including deposition of redistribution material on the bed of the stream to create access and works areas for machinery to safely access the pipeline. <p>Including any deposition, disturbance or discharge of sediment from bed or bank of the stream to the Karori Stream during maintenance activities.</p> <p>WGN160340 [34179] Water permit to temporarily and permanently divert the flow of the Karori Stream to enable the maintenance of the Western Wellington Wastewater Treatment Plant Main Outfall Pipe including;</p> <ul style="list-style-type: none"> • The diversion of water during maintenance activities; and • The diversion of water to prevent the scour of the bed and banks of the stream where is threatens the stability of the pipeline. <p>WGN060283 [35675] Discharge permit to occasionally discharge milli-screened and settled wastewater from the Western Wastewater Treatment Plant to Karori Stream during events when the stormwater tank is full and the flow to the plant exceeds 390 L/s.</p>		

Your compliance rating

[22098], [25230], [25227], [35675], [34178], [34179]		FULL COMPLIANCE All conditions met – well done! No further action required
[35674]		MODERATE NON-COMPLIANCE Some condition(s) not met. Action required (see comments below)
[35255]		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required (see comments below)

Overall compliance summary for Western Wastewater Treatment Plant and outfall pipeline:

POOR 	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.
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Comments

I have summarised my overall compliance assessment for the Western Wastewater Treatment Plant and outfall pipeline over the 2019-2020 compliance year below:

Operational discharge of treated wastewater to coastal waters [35255]:

Continuous discharge effluent volume:

Condition 2 of this consent requires that the rate of discharge shall not exceed 200 litres per second (L/s) or 17,280 cubic metres per day (m³/day).

The data provided in the annual report shows that volume of effluent discharged from the outfall pipeline did not exceed the limits set in condition 2 of this report.

Condition 6 of this consent requires the consent holder to ‘continuously monitor and record the flow rate and volume of treated wastewater entering the outfall pipeline and the flow rate and volume of the wastewater discharged to the South Coast’. In the compliance assessment period from 1 July 2020 to 30 June 2021 there are no effluent flow records for:

- 1, 2, 18 and 19 July 2020
- 20th October to 10th November 2020
- 20, 27 to 30 June 2021.

The failure to continuously monitor and record the flow rate and volume of the wastewater discharged to the South Coast on these dates is a **non-compliance** with condition 6 of WGN060283 [35225]. The WWL annual resource consent compliance report sets out that the causes of these missing records were a series of electrical and equipment failures.

Condition 5 requires community liaison group (CLG) forums to be held annually. A CLG meeting was held on 9 September 2020, this is compliant with the requirement of condition 5.

Conditions 10 & 11 set effluent quality limits, and requirements to notify GWRC immediately when the geometric mean effluent quality value calculated at the end of each calendar month exceeds the effluent quality limits. This has been assessed as **non-complying** with condition 10 due to the following exceedances:

- Effluent BOD was non-compliant for March, and May 2021.
- Effluent suspended solids were non-compliant for January, March, April, and May 2021.
- Effluent faecal coliform was non-compliant for January and March 2021.

On the 15th of June 2021 formal warning letters were issued to both Wellington City Council (as the consent holder), and Wellington Water Limited (who manage the Western WWTP on behalf of Wellington City Council) for this non-compliant discharge to the Coastal Marine Area. Additionally, an infringement notice was issued to Veolia who operate the Western WWTP for this non-compliant discharge.

As of the end of June 2021, the effluent quality results for the Western WWTP are compliant. Thank you for the work that has been done to get the effluent quality to return to within the compliance limits. Please continue to ensure that the effluent quality remains compliant.

Condition 16 requires the consent holder to collect representative coastal water samples from knee deep water at four locations close to the outlet, once each month for five months through November to March inclusive (the bathing season) each year. The WWL Annual provides the results of this monitoring.

The Annual and Quarterly reporting requirements under conditions 19 and 20 of this consent were both met.

Condition 23 requires an annual report to be submitted on the condition of the main outfall pipeline. On the 23rd of August 2021 the Western WWTP Annual Outfall pipeline report was submitted by WWL

to GWRC. It was agreed by GWRC that the submission of this report after the date required by condition 23 was acceptable.

The outfall pipeline walkover inspection was carried out on 08 April 2021. The report outlined the repairs which were carried out between 1 August 2020 to 31st July 2021. As well as the repairs scheduled for between 1st August 2021 to 31st July 2022.

Condition 25 requires the consent holder shall collect representative water samples from the Karori Stream at four locations, once every fortnight for the duration of this permit. The results of these samples were provided as appendix V of the Annual report.

Coastal occupation permit for outfall structure [22098]

The walkover inspection of the coastal outfall structure was carried out on 04 April 2021 as required by **condition 2** of this permit. The Western WWTP Annual Outfall pipeline report outlined the repairs which were carried out between 1 August 2020 to 31st July 2021. The surge tank at the coastal outfall has been checked by approved contractors and cleared of sand.

Discharge to air permit [25230]

Condition 3 requires ambient microbe monitoring biannually. This was performed at the Western WWTP on 28th October 2020 and 22nd April 2021 – this confirmed the absence of Salmonella, and Faecal Coliforms in the vicinity of the plant.

Condition 4 requires annual biofilter monitoring. The biofilter media assessment was completed in October 2020. The biofilter media is scheduled to be replaced during the 2021-2022 financial year.

In accordance with condition 10 of this consent a record has been kept of the complaints made about the Western WWTP. The record shows that no complaints have been received about the Western WWTP.

Overflow discharge permit WGN060283 [25227]

Condition 2 of WGN060283 [25227] allows for the discharge partially treated effluent to Cook Strait via an existing outfall when the sewage inflow to the treatment plant exceeds 190 litres per second (L/s), and the 1000 m³ storage tank is full. There were six bypass events under this consent in the 2020/2021 reporting year.

In accordance with Conditions 5 of WGN060283 [25227] the consent holder monitored and recorded the time, flow rate, duration and total volume of each of these bypass discharges into the coastal marine area, and shall reported the results to GWRC within 10 working days of the event occurring.

Further, in accordance with condition 6 the WWL annual report provides data on the amount of rainfall recorded in each hour at Karori Reservoir rain-gauge for each of the 7 days preceding each overflow.

The consent holder carried out the effluent quality and receiving environment sampling required by conditions 7 and 8 of this consent as required.

The consent holder provided the annual Inflow and Infiltration report required by condition 12 of this consent as Appendix iv of the WWL Annual Report.

Overflow discharge permit WGN060283 [35674]

Condition 2 of WGN060283 [35674] allows for the discharge of fully treated effluent to the Karori stream when the sewage inflow to the treatment plant exceeds 190 litres per second (L/s), and the 1000 m³ storage tank is full. There were 7 discharges under this consent in the reporting period. These events were all compliant with the requirements of condition 2 except for the 18th Sept unconsented discharge, which occurred while the storm tank was not full. GWRC issued a formal warning in response to this incident, and this will be recorded as a non-compliance with the consent conditions.

In accordance with Conditions 6 of WGN060283 [35674] the consent holder monitored and recorded the time, flow rate, duration and total volume of each of these bypass discharges into the coastal marine area, and shall reported the results to GWRC within 10 working days of the event occurring.

Further, in accordance with condition 7 the WWL annual report provides data on the amount of rainfall recorded in each hour at Karori Reservoir rain-gauge for each of the 7 days preceding each overflow.

The consent holder carried out the effluent quality and receiving environment sampling required by conditions 8 and 9 of this consent as required.

The consent holder provided the annual Inflow and Infiltration report required by condition 15 of this consent as Appendix iv of the WWL Annual Report.

Overflow discharge permit WGN060283 [35675]

Condition 2 of WGN060283 [35675] allows for the discharge milli-screened and settled wastewater from the Western Wastewater Treatment Plant to Karori Stream when the sewage inflow to the treatment plant exceeds 390 litres per second (L/s), and the 1000 m³ storage tank is full. There was one discharge under this consent in this monitoring period.

In accordance with Conditions 5 of WGN060283 [35675] the consent holder monitored and recorded the time, flow rate, duration and total volume of each of these bypass discharges into the coastal marine area, and shall reported the results to GWRC within 10 working days of the event occurring.

Further, in accordance with condition 6 the WWL annual report provides data on the amount of rainfall recorded in each hour at Karori Reservoir rain-gauge for each of the 7 days preceding each overflow.

The consent holder carried out the effluent quality sampling required by condition 7 of this consent as required

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.

The major compliance issues at the Western WWTP in this compliance period relate to the non-compliance with the effluent quality parameters in January, March, April, and May 2021. I appreciate the work that was done to get the effluent quality back to within the consented limits, as well as the way the issues were communicated.

On this occasion we have decided not to take any further enforcement action because effluent quality results have returned to within compliance limits. However, we may not be so lenient should you be responsible for any further breaches of 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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