

Site Compliance Report

Site No: REG606683
Site Owner: Waikato District Council
Site Name: Raglan WWTP: Wainui Rd, Raglan
Date: 10 October 2014

1 INTRODUCTION

This report examines the level of compliance of Waikato District Council with the conditions of the resource consents that authorise the activities of the Raglan WWTP: Wainui Rd, Raglan. Unless otherwise specified in this document the data collected covers the period from **1 July 2013 to 30 June 2014**.

2 AUTHORISATIONS HELD

This report examines the level of compliance of Waikato District Council with the the following authorisations:

Authorisation	Status	Authorisation Description	Commenced	Expiry
AUTH971390.01.01	Current	Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	14/02/2005	14/02/2020
AUTH971391.01.01	Current	Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour	14/02/2005	14/02/2020
AUTH971392.01.01	Current	Discharge odour to the air associated with all aspects of the existing & proposed treatment system	14/02/2005	14/02/2020

3 BACKGROUND

The Raglan wastewater treatment plant (WWTP) in Wainui Road receives, treats and discharges municipal wastewater from the Raglan Township and also the recently reticulated homes along the Whaanga Coast to Whale Bay.

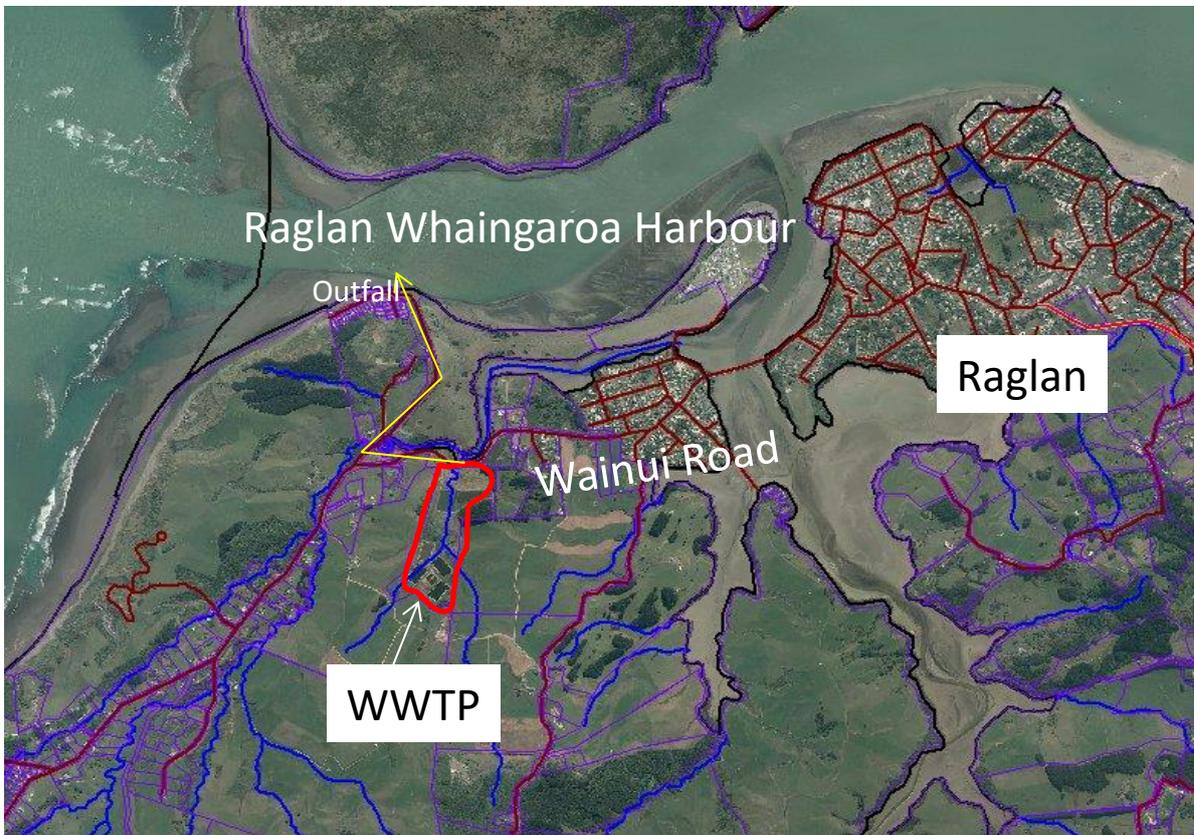
Treatment consists of screening, anaerobic ponds (used occasionally), aerated ponds with aquamats and UV disinfection prior to discharge by outfall into the Raglan Harbour mouth on an outgoing tide.

The Waikato District Council (WDC) holds the above authorisations associated with the treatment and discharge of wastewater from the Raglan wastewater treatment plant (WWTP) to the Raglan (Whaingaroa) Harbour. The authorisations were issued in February 2005 and have an expiry date of February 2020.

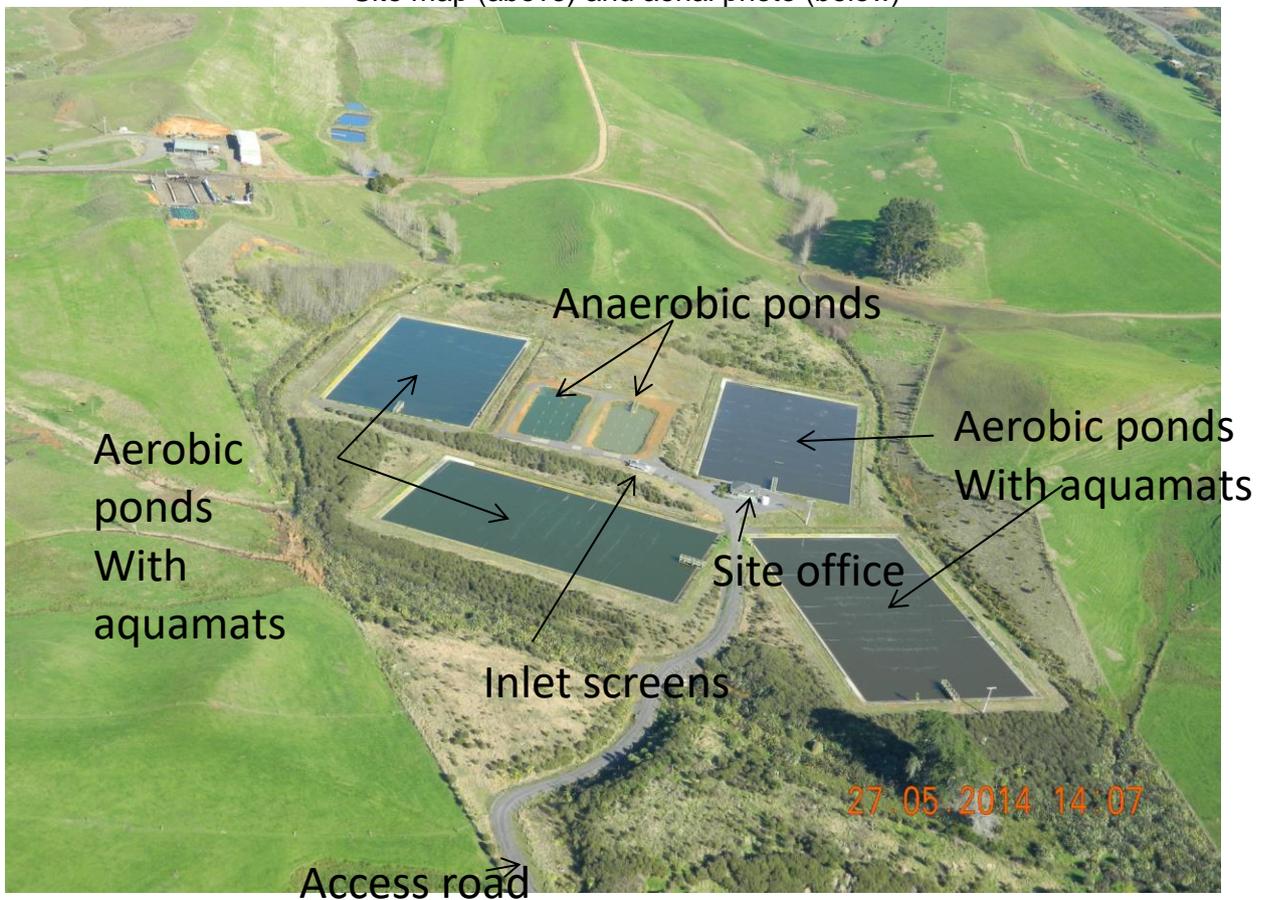
The primary authorisation issued by Waikato Regional Council is for the following activity:

971390 To discharge up to 2,600m³ per day of treated wastewater from the plant after treatment subject to a number of conditions.

The average daily discharge of treated effluent was 1,031m³ over the reporting period.



Site map (above) and aerial photo (below)



A review of the monitoring results during the 2013-14 reporting year indicates good performance in terms of bacteriological treatment.

However the compliance requirement for suspended solids (TSS) is not being met and the reasons for the high TSS in the final pond discharge are currently being investigated. The focus is on the final effluent pond because the TSS in the final Aquamat pond discharge is not high and usually within the final effluent compliance limits.

The storage pond produces algae during the warmer months and that will affect the final effluent TSS result. However, test results suggest an alternative source based on the final effluent cBOD₅/TSS concentration ratio. If the main source of TSS was from algae growth in the storage pond the ratio would be much higher, hence other sources of TSS contamination are being investigated.

The current investigations being undertaken by WDC will determine whether sediment and/or detritus from the final pond is passing through the rock filter to the outlet.

4 COMPLIANCE ASSESSMENT

Please note that a description of the classification system used to describe compliance status is given in Appendix 1 of this report.

AUTH971390.01.01 - Water - sewage

Activity Authorised: Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	
Condition No.	Description
1	The Raglan wastewater treatment and disposal system shall be constructed, operated and maintained in general accordance with the documents titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 –Report", "Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information" dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environmental Effects" dated October 2002, or inconsistent with the resource consent conditions below, which shall prevail. This condition shall preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.
Evidence	The Raglan wastewater treatment and disposal system has been constructed, operated and maintained in general accordance with the documents. There were 6 occasions where the maximum discharge volume was exceeded. These were due to rainfall events and were minor in scale within the tolerance limits of the meter used.
Status Reasoning	
Action Required	Full compliance
2	Suitable fencing shall be installed and maintained to ensure that livestock are at all times unable to access the wastewater treatment site.
Evidence	Suitable fencing has been installed.
Status Reasoning	
Action Required	Full compliance
3	The consent holder shall construct the Raglan wastewater treatment system in accordance with accepted civil engineering practices. To this end the consent holder shall, unless otherwise required by Waikato Regional Council in writing following consultation with the consent holder, retain a suitably qualified registered engineer to: (i) supervise the construction of the Raglan wastewater treatment system; (ii) ensure that the filter treatment system, facultative, maturation and holding ponds, and UV disinfection unit are constructed to a standard appropriate for their anticipated use, and to an adequate standard to withstand peak loading conditions, and to withstand earthquake events, in accordance with accepted engineering design requirements; and (iii) within 2 months following construction of the Raglan wastewater treatment system, to provide a written

	report to the Waikato Regional Council detailing the construction procedures used and the “as-built” details of works associated with the exercise of this consent. The report shall demonstrate that the works have been carried out in accordance with accepted civil engineering practice and are such as to meet the conditions of this consent.	
Evidence		
Status Reasoning		
Action Required		Not assessed
4	<p>The consent holder shall provide the Waikato Regional Council with a management plan which details the procedures that will be implemented to operate in accordance with the conditions of this resource consent and the procedures that will be put into place to avoid the potential for adverse effects on the Raglan Harbour. This plan shall be lodged with the Waikato Regional Council for its approval within 12 months of date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. The plan shall as a minimum include the following: (i) a description of the entire treatment system facility including: - the filter treatment system, facultative, maturation and holding ponds, and ultra-violet (UV) disinfection unit; - discharge pumps, - discharge pump activation/deactivation and monitoring systems, including a back up system to ensure failsafe operation of the discharge pumps on the outgoing tide, and - discharge and outfall pipeline. (ii) a description of routine maintenance procedures to be undertaken; (iii) an outline of the methods to be utilised to monitor the treatment plant in an operational sense including: - monitoring of influent waste water - monitoring of treatment performance (iv) specific management procedures for operation of the wastewater treatment system, discharge and outfall pipeline; (v) procedures for recording routine maintenance and all repairs that are undertaken; (vi) contingency measures in place to deal with unusual events; (vii) other actions necessary to comply with the requirements of this resource consent; (viii) procedures for improving and/or reviewing the management plan. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft management plan presented and explained to it and shall take into consideration any comments made by the Tainui Hapu prior to lodgement of the management plan with the Waikato Regional Council for approval. The consent holder shall on submitting the management plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council’s consideration. The management plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved management plan.</p>	
Evidence	A combined Management and Contingency Plan was submitted on 30 September 2014 (doc ref 3184984)	
Status Reasoning		
Action Required		Full compliance
5	<p>The Waikato Regional Council may with six months of the commissioning of the treatment system (including filter treatment system, facultative maturation and holding ponds, and UV disinfection unit) in September 2006, September 2008, September 2010, September 2012 and September 2014, after consultation with the consent holder, serve notice on the consent holder under section 128 (1) of the Resource Management Act 1991, of its intention to review the conditions of this resource consent for the following purposes: (i) to review the requirement for less or further monitoring of enterococci (condition 17) and to review the specified maximum limit in conditions 14, 15, 16, and 17 of this resource consent; or (ii) to review the effectiveness of the conditions of this resource consent in avoiding or mitigating any advert effects on the environment from the exercise of this resource consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or (iii) to review the adequacy of and the necessity for monitoring undertaken by the consent holder. Note: Costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.</p>	
Evidence	A review is not required at this time.	
Status Reasoning		
Action Required		Not assessed

6	<p>The consent holder shall provide the Waikato Regional Council with a contingency plan that assesses the environmental hazards associated with potential discharge of wastewater from the wastewater treatment site and marine outfall. This plan shall be lodged with the Waikato Regional Council for its approval within 3 months of date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. The hazard analysis shall include contingency plans to avoid discharges to the unnamed waterways on the treatment site and unauthorised discharges to the Raglan Harbour. The hazard analysis shall include consideration of the following events: (i) overtopping of one or more ponds; (ii) structural failure of one or more ponds; (iii) Datran system failure; The analysis shall include measures undertaken to effectively avoid the risk of a spill and measures available to reduce the impact of a spill, should one occur. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft contingency plan presented and explained to it and shall take into consideration any comments made by the Tainui Hapu prior to lodgement of the contingency plan with the Waikato Regional Council for approval. The consent holder shall on submitting the contingency plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council's consideration. The contingency plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved contingency plan.</p>
Evidence	A combined Management and Contingency Plan was submitted on 30 September 2014 (doc ref 3184984)
Status Reasoning	
Action Required	Full compliance
7	<p>The consent holder shall keep a complaints register for all complaints regarding all aspects of operations (with the exception of odour which is the subject of a separate resource consent) at the wastewater treatment facility received by the consent holder. The register shall record: (i) the date, time and duration of the event/incident that has resulted in a complaint; (ii) The nature of the event/incident complained of; (iii) the location of the complainant when the event/incident was detected; (iv) the possible cause of the event/incident; and (v) any corrective action undertaken by the consent holder in response to the complaint. The register shall be available to the Waikato Regional Council at all reasonable times upon request. Complaints received by the consent holder which indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 days of the complaint being received.</p>
Evidence	<p>WDC operates a CRM complaints register for all council related operations. WDC have reported one odour related complaint for this compliance period.</p> <p>COMPLAINTS SUMMARY JULY 2013 - JUNE 2014 RAGLAN WWTP August 2013 Raglan resident advised WDC of a very strong smell of sewerage around the Raglan WWTP. Treatment Plant Engineer investigated and found nil odor or issue with the plant. The resident was advised of the outcome.</p>
Status Reasoning	
Action Required	Full compliance
8	<p>Until the fifth anniversary of the date of commencement of this consent as defined in section 116 of the Resource Management Act 1991, the maximum volume of treated wastewater discharged shall not exceed 2,600 cubic metres in any 24 hour period.</p>
Evidence	Next available date for a review of the volume condition is in 2015
Status Reasoning	
Action Required	Not assessed
9	<p>A water flow meter shall be installed to record the quantity of treated wastewater discharged on a cumulative basis per tidal period. The meter shall be calibrated to ensure measurement of treated wastewater flow is maintained to an accuracy of +/- 2%. Access to the meter shall be provided to Waikato Regional Council staff at all reasonable times. The flow meter display panel shall be visible to the public.</p>
Evidence	<ul style="list-style-type: none"> • A meter is installed to record quantities of effluent discharged. The meter was calibrated May 2014 (doc ref 3086423).

	<ul style="list-style-type: none"> A flow display panel visible to the public is installed on the roadside wall of the UV building. 	
Status Reasoning		
Action Required		Full compliance
10	The consent holder shall maintain a record of the daily volume of treated wastewater discharged from the treatment system which shall be made available to the Waikato Regional Council at all reasonable times and these records shall be forwarded to the Waikato Regional Council on a three monthly basis.	
Evidence	daily volume data is collected and submitted monthly to WRC	
Status Reasoning		
Action Required		Full compliance
11	The discharge of treated wastewater shall occur for a maximum of 5.5 hours per outgoing tide. The discharge may commence no earlier than 0.5 hours before high tide and shall cease no later than 1 hour before low tide. Provided that for not more than 20 days per year immediately after extreme weather, pumping hours may exceed that maximum discharge duration of 5.5 hours per tide.	
Evidence	discharges have occurred during the specified times and WDC have reported no non-compliances relating to pumping hours for the compliance period.	
Status Reasoning		
Action Required		Full compliance
12	The consent holder shall maintain a record of the date and time each discharge cycle commences and finishes which shall be made available to the Waikato Regional Council upon request and these records shall be forwarded to the Waikato Regional Council on a three monthly basis.	
Evidence	Actual start and stop times can only be provided by manually calculating them at present however WDC is currently undergoing a SCADA upgrade and as part of this they should be able to provide start and stop times in real time.	
Status Reasoning	It is important to know when the pumps are on and off so compliance with tidal cycles can be adequately assessed. WDC can calculate this manually if requested however this is far from ideal and requires specific request being made for a particular period and then a print out can be provided.	
Action Required	Upgrade SCADA or similar system to ensure that pump start and stop times can be monitored and reported as per condition 12.	Minor technical non-compliance
13	There shall be no discharge of oil or grease or persistent surface foam as a result of the exercise of this consent.	
Evidence	No oils, grease or scum/foam has been observed during this compliance period.	
Status Reasoning		
Action Required		Full compliance
14	The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the suspended solids level does not exceed a median level of 20 grams per cubic metres for 12 consecutive monthly samples (one sample per month) and a maximum of 30 grams per cubic metre for 9 of 10 consecutive monthly samples (one sample per month). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.	
Evidence	TSS levels have been consistently above the consented limit. the TSS relates to the growth of algae in the final holding pond whilst the effluent waits to be pumped out on the outgoing tide. WDC is undertaking further investigations into the cause of TSS levels and they have submitted a plan proposal for a spend of \$565k over the next 3 years to improve the situation	

Status Reasoning	Continued non-compliance for the last few years for TSS from the final pond.	
Action Required	Ensure WDC acts on submitted proposal to rectify this situation and takes positive action to reduce TSS levels to below compliant limits. WDC has provided a plan for the next 3 years to deal with this issue: Phase 1: 2014-15 Final storage pond, investigation into Algae issues and capacity. Cost: \$15k Phase 2: 2015-16 - Capital project to address Algae (Floating wetland or cover). Cost: \$300k Phase 3: 2016-17 (On-going Tasks) - Capital project to improve capacity. Cost: \$ 250k	Low priority non-compliance
15	The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the 5-day biochemical oxygen demand (BOD5) concentration of the discharge does not exceed a median level of 10 grams per cubic metre of 12 consecutive monthly samples (one sample per month) and a maximum of 20 grams per cubic metre for 9 of 10 consecutive monthly samples (one sample per months). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.	
Evidence	cBOD-5 samples are compliant	
Status Reasoning		
Action Required		Full compliance
16	The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the concentration of faecal coliforms in the discharge does not exceed a median level of 14 (number per 100 millilitres) for 12 consecutive monthly samples (one sample per month) and a maximum of 43 (number per 100 millilitres) for 9 of 10 consecutive samples (one sample per month). Upon completion of the treatment system the point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.	
Evidence	full compliance has been achieved with this condition for FC samples	
Status Reasoning		
Action Required		Full compliance
17	The consent holder shall monitor the concentration of enterococci in the discharge at weekly intervals from 15 December to 30 January. The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the concentration of enterococci in the discharge is less than 35 enterococci per 100 millilitres of 5 of 6 consecutive weekly samples (one sample per week). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods for The Examination of Water and Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.	
Evidence	9 samples were taken between 1 January and June 2014. The condition states that samples must be taken weekly between 15 December and 30 January however the submitted results do not verify that this was done. The first sample should have been taken around 15 December however the first actual sample was taken on 3 January. The final sample was taken in June.	
Status Reasoning	Sampling is required from 15 December through to 30 January each year and should be done weekly. The results submitted show that no sample was taken until 3 January 2014.	
Action Required	Ensure samples are taken at the required dates for all parameters.	Low priority non-compliance

18	The consent holder shall provide to the Waikato Regional Council a written monitoring report by 30 September each year for the previous year ending 30 June of each year that this consent is current. As a minimum this report shall include the following: (i) a comparison of data with previously collected data identifying any emerging trends in effluent quality in terms of suspend solids, five-day biochemical oxygen demand, faecal coliforms and enterococci (reference conditions 14,15, 16 and 17); (ii) comment on compliance with conditions 8,9,10,11,12,13,14,15,16 and 17 of this resource consent; (iii) any reasons for non-compliance or difficulties in achieving compliance with conditions 8,9,10,11,12,13,14,15,16, and 17 of this resource consent; (iv) any works that have been undertaken to improve the environmental performance of the wastewater treatment system or that are proposed to be undertaken in the up-coming year to improve the environmental performance of the wastewater treatment system; and (v) recommendations on alterations to the monitoring required by conditions 14,15,16 and 17 of this resource consent.
Evidence	The annual report was submitted on 30 September 2014 (doc ref 3185025)
Status Reasoning	
Action Required	Full compliance
19	The consent holder shall notify the Waikato Regional Council as soon as practicable and as a minimum requirement within 24 hours, of the consent holder becoming aware of the limits specified in conditions 8, 11, 14, 15, 16, and 17 of this resource consent being exceeded and/or of any accidental discharge, plant breakdown, or other circumstances which are likely to result in the limits of this resource consent being exceeded. The consent holder shall, within 7 days of the incident occurring, provide a written report to the Waikato Regional Council, identifying the exceedance, probable causes, steps undertaken to remedy the effects of the incident and measures that will undertaken to ensure future compliance.
Evidence	WDC keeps WRC informed of any of the limits specified in conditions 8,11,14, 15, 16, and 17 of this resource consent being exceeded and/or of any accidental discharge, plant breakdown or other circumstances.
Status Reasoning	
Action Required	Full compliance
20	The consent holder shall maintain a register of all incidents that result in an exceedance of the limits specified in conditions 9, 12,15,16,17 and 18 of this resource consent. This register shall be made available for inspection by Waikato Regional Council staff at all reasonable times. This register shall be forwarded to the Waikato Regional Council by 30 June each year.
Evidence	A register of incidents is kept and included in the annual report summary. - Raglan resident advised WDC of a very strong smell of sewerage around the Raglan WWTP. Treatment Plant Engineer investigated and found nil odour or issue with the plant. The resident was advised of the outcome. -Neighbouring farmer was concerned about land movement on a couple of slopes adjacent to the Raglan ponds. A preliminary investigation has been undertaken. Further geo-tech investigations are underway.
Status Reasoning	
Action Required	Full compliance
21	The consent holder shall provide to the Waikato Regional Council, by the 5th anniversary of the granting of this consent, an Effects Assessment Report, that provides as a minimum: (i) A review of all monitoring results collected since this consent was granted; (ii) A discussion of the acceptability of the discharge to local Tainui Hapu; (iii) An assessment of the need to improve wastewater discharge quality and/or provide alternative disposal methods, based on the information provided in (i) and (ii) of this condition; (iv) A review of current developments in wastewater treatment and disposal technology that could be appropriate for Raglan wastewater treatment and disposal; (v) Recommendations for future action in the light of (i) to (iv) above. The Effects Assessment Report shall be prepared by a suitably qualified/experienced person(s) and shall be to a standard acceptable to the Waikato Regional Council.
Evidence	Report was submitted in 2010
Status Reasoning	
Action Required	Not assessed

22	The consent holder shall pay to the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act 1991, or any change prescribed in accordance with regulations made under section 360 of the Resource Management Act.	
Evidence		
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance:		High level of compliance

AUTH971391.01.01 - Water - sewage

Activity Authorised: Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour		
Condition No.	Description	
1	The existing pipeline and outfall shall be operated and maintained in general accordance with the document titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 – Report", "Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information " dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environmental Effects" dated October 2002, or inconsistent with the resource consent conditions below, which shall prevail. The condition shall not preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.	
Evidence	• This structure is a relatively new piece of infrastructure and as expected there have been nil reports of any issues which would compromise the structural integrity of this pipeline.	
Status Reasoning		
Action Required		Full compliance
2	The consent holder shall maintain the pipeline and outfall in a structurally safe condition at all times.	
Evidence	• This structure is a relatively new piece of infrastructure and as expected there have been nil reports of any issues which would compromise the structural integrity of this pipeline.	
Status Reasoning		
Action Required		Full compliance
3	The consent holder shall maintain the outfall pipeline so as to minimise potential for the loss of components due to water action. Should the outfall pipeline become damaged, and material lost constitutes a hazard to navigation, the Maritime Safety Authority or such other appropriate body shall be immediately informed. Damage to the pipeline shall be reported to Waikato Regional Council immediately and repairs shall be undertaken as soon as practicable. Note: A separate resource consent may be required as a result of the need to undertake works on the foreshore and/or harbour bed. Any such consent shall be obtained by the consent holder at its sole expense prior to any works being undertaken.	
Evidence	WDC has not reported any loss or damage to the outfall pipeline discharge point	
Status Reasoning		
Action Required		Not assessed
4	The consent holder shall pay to the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act 1991, or any charge prescribed in accordance with regulations made under section 360 of the Resource Management Act.	
Evidence	all required invoices have been paid	
Status Reasoning		

Action Required		Full compliance
Authorisation Compliance: Full compliance		

AUTH971392.01.01 - Air - odour

Activity Authorised: Discharge odour to the air associated with all aspects of the existing & proposed treatment system		
Condition No.	Description	
1	The wastewater treatment system shall be operated and maintained in general accordance with the documents titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 – Report" Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information " dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environment Effects" dated October 2002, or consistent with the resource consent conditions below, which shall prevail. This condition shall not preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.	
Evidence	The wastewater treatment system is operated and maintained in general accordance with the documents listed above.	
Status Reasoning		
Action Required		Full compliance
2	There shall be no odour as a result of the activities authorised by this resource consent that causes an objectionable or offensive effect beyond the boundary of the site, being that land defined by: • Gazette Notice, 1974, page 2548 (Land taken for Sanitary Works situated in Block I, Karioi Survey District, described as part lot 1, DP 13913, and Part Rakaunui 1C2A2 Block); • Gazette Notice, 1999 page 3849 (Land acquired for Wastewater Treatment described as Part Lot 1, DP 13913 (part C.T/ 47C/740).	
Evidence	No air discharge complaints have been lodged or notified to WRC relating to this activity for this compliance period.	
Status Reasoning		
Action Required		Full compliance
3	The consent holder shall maintain and keep a complaints register for all odour complaints in respect of the wastewater treatment facility received by the consent holder. The register shall record: (i) the date, time and duration of the event/incident that has resulted in a complaint; (ii) the location of the complainant when the event/incident was detected; (iii) the possible cause of the event/incident (iv) the weather conditions and wind direction at the site when the odour event allegedly occurred; (v) any corrective action undertaken by the consent holder in response to the complaint. The register shall be made immediately available to the Waikato Regional Council upon request. Any event/incident with the potential to cause emissions resulting in adverse effects on the environment shall be reported to the Waikato Regional Council as soon as practicable and in any event within 24 hours of the incident occurring.	
Evidence	WDC keeps a CRM complaints register. No air discharge complaints have been lodged or notified to WRC relating to this activity for this compliance period.	
Status Reasoning		
Action Required		Full compliance
4	The consent holder shall provide the Waikato Regional Council with a management plan which details the procedures that will be implemented to operate in accordance with the conditions of this resource consent and the procedures that will be put into place avoid the potential for the discharge of odours that cause an offensive and objectionable effect beyond the boundary of the Raglan Wastewater Treatment site. This plan shall be lodged with the Waikato Regional Council within 12 months of the date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. (i) a description of the entire treatment system facility, including - the filter treatment system, facultative,	

	<p>maturation and holding ponds, and ultra-violet (UV) disinfection unit, - discharge pumps - discharge pump activation/deactivation and monitoring systems, including a back up system to ensure failsafe operation of the discharge pumps on the outgoing tide; and - discharge and outfall pipeline. (ii) a description of routine maintenance procedures to be undertaken; (iii) an outline of the methods to be utilised to monitor the treatment plant in an operational sense including; - monitoring of influent waste water; - monitoring of treatment performance (iv) specific management procedures for operation of the wastewater treatment system, discharge and outfall pipeline; (v) procedures for recording routine maintenance and all repairs that are undertaken; (vi) contingency measures in place to deal with unusual events; (vii) other actions necessary to comply with the requirements of this resource consent; (viii) procedures for improving and/or reviewing the management plan. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft management plan presented and explained to it and shall consider any comments made by the Tainui Hapu prior to lodgement of the management plan with the Waikato Regional Council for approval. The consent holder shall on submitting the management plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council's consideration. The management plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved management plan.</p>
Evidence	An updated site management and contingency plan was submitted on 30 September 2014 (doc ref 3184984)
Status Reasoning	
Action Required	Full compliance
5	<p>The Waikato Regional Council may in within six months of the commissioning of the treatment system (including filter treatment system, facultative maturation and holding ponds, and UV disinfection unit) in September 2006, September 2008, September 2010, September 2012 and September 2014, and after consultation with the consent holder serve notice on the consent holder under section 128 (1) of the Resource Management Act 1991, of its intention to review the conditions of this resource consent for the following purposes: (i) to review the effectiveness of the conditions of this resource consent in avoiding or mitigating any adverse effects on the environment from the exercise of this resource consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or (ii) to review the adequacy of and the necessity for monitoring undertaken by the consent holder. Note: Costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.</p>
Evidence	WRC does not intend to review the air discharge at this time.
Status Reasoning	
Action Required	Not assessed
Authorisation Compliance: Full compliance	

5 SUMMARY OF ACTIONS REQUIRED

Authorisation	Condition Number	Action Required
AUTH971390.01.01	12	Upgrade SCADA or similar system to ensure that pump start and stop times can be monitored and reported as per condition 12.
AUTH971390.01.01	14	Ensure WDC acts on submitted proposal to rectify this situation and takes positive action to reduce TSS levels to below compliant limits. WDC has provided a plan for the next 3 years to deal with this issue: Phase 1: 2014-15 Final storage pond, investigation into Algae issues and capacity. Cost: \$15k

		Phase 2: 2015-16 - Capital project to address Algae (Floating wetland or cover). Cost: \$300k Phase 3: 2016-17 (On-going Tasks) - Capital project to improve capacity. Cost: \$ 250k
AUTH971390.01.01	17	Ensure samples are taken at the required dates for enterococci

6 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

Based on the conditions selected for monitoring, overall compliance has been assessed as below:

Authorisation	Authorisation Description	Compliance Status
AUTH971390.01.01	Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	Activity - High level of compliance
AUTH971391.01.01	Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour	Activity - Full compliance
AUTH971392.01.01	Discharge odour to the air associated with all aspects of the existing & proposed treatment system	Activity - Full compliance

Overall Site Compliance: High level of compliance

6.1 RECOMMENDATION

In accordance with the above assessment I recommend that Waikato Regional Council issues a **Letter of Direction** detailing the issues that need attention to improve compliance. I consider that Waikato District Council are already aware of 2 of the outstanding issues and have plans to rectify the situation. Waikato District Council has proposed a timeline of actions with corresponding financial amounts to achieve this work. However I consider these issues have remained unresolved for too long and that now we should require confirmation of definite actions with timeframes and allocation of funds to improve their compliance at this site.

Type	Details
Letter of Direction (Directive/Consent)	Ensure SCADA system or alternative is upgraded to produce pump on and off times as required by condition number 12. Ensure that TSS levels are reduced to compliant levels as required by condition 14 by 30 June 2015. Ensure that samples for enterococci are taken weekly from 15 December to 30 January each year.

In line with their proposal submitted in this years annual report Waikato District Council have indicated a 3 year staged upgrade of the final pond including an initial investigation period, a capital project to reduce/address algal growth and a capital project to increase capacity.

I propose that Waikato District Council formalises this proposal or something similar in order to address the continued non-compliance at this site that has occurred over the previous few years. The non-compliance of the TSS is the one major issue that needs to be addressed in the run up to the consent renewal application process in 2020.

	Phase 1: 2014-15	Phase 2: 2015-16	Phase 3: 2016-17 (On-going Tasks)
Raglan WWTP Task	Bring Anaerobic ponds into operation (risk of odour requiring capital works). Cost: \$50k	If successful capital project to line Anaerobic ponds. Cost: \$150k	
	Aerobic Ponds improve aeration, install instrumentation and review operations. Cost: \$90k	Sludge removal programme. Cost: \$65k	
	Final storage pond, investigation into Algae issues and capacity. Cost: \$15k	Capital project to address Algae (Floating wetland or cover). Cost: \$300k	Capital project to improve capacity. Cost: \$ 250k
	UV System increase pumping capacity. Cost: \$20k		

Waikato District Council's proposed 3 year plan for upgrades at Raglan WWTP (above)

Although the site is in overall high level of compliance I consider that any non-compliant issue that has not been resolved within 5 years needs to be elevated to a higher level of attention and urgency and cannot be left to continue beyond the next audit period ending June 30th 2015.

Failure to secure funding and a commitment from Waikato District Council to improve compliance by that time may lead to enforcement action being considered for non-compliance at this site.

I have received an enquiry from Waikato District Council regarding the construction of an additional pond for the holding of treated wastewater prior to discharge from the WWTP. This pond will be emptied daily and any accumulation of residue could be removed to reduce the levels of SSIDs being discharged. This would avoid the chance of algae growing in the nutrient rich final treated wastewater as currently occurs. The existing pond would be retained as a contingency pond. Investigations into the feasibility of this pond are currently underway at the time of writing this report.

Edward Prince
Resource Officer - Resource Use Group
Resource Use

Date:

6.2 Decision

I approve with the reporting officer's assessment of compliance with the selected conditions and recommended actions:

Hugh Keane
Team Leader
Resource Use

Date:

APPENDIX

Compliance Status	Description
Not assessed	Monitoring of this condition was not undertaken during this monitoring event
High priority non-compliance	The non-compliance has the potential for, or has resulted in, significant adverse effects on the environment.
Medium priority non-compliance	There is non compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a greater than minor increase in the level of effects authorised.
Low priority non-compliance	There is non compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a less than minor increase in the level of effects authorised; and/or There has been a significant technical non-compliance such as a failure to collect or supply self monitoring data.
Minor technical non-compliance	There is non compliance with a condition, or part of a condition, that does not directly control adverse effects; and The non-compliance was not significant in the management of effects. For example a short delay in supplying data or meeting a deadline for a report
Full Compliance	The condition has been complied with

Compliance status for individual consents and the entire site

Compliance Status	Description
Not assessed	Monitoring has not been undertaken at this site during the current financial year
Significant non-compliance	There has been a high priority non-compliance; and/or There have been several medium priority non-compliances.
Partial compliance	There has been a medium priority non-compliance; and/or There have been several low priority non-compliances.
High level of compliance	There has been a low priority non-compliance; and/or There have been several minor technical non-compliances.
Full compliance	All conditions that include limits or other direct controls on adverse effects have been complied with. A small number of minor technical non-compliances may have occurred.