

Site Compliance Report

Site No: REG606683
Site Owner: Waikato District Council
Site Name: Raglan WWTP: Wainui Rd, Raglan
Date: 14 October 2015

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH123522.01.01	Expired	To remove a wastewater pipeline from over the Wainui Stream including associated disturbance and vehicle use in the CMA	15/11/2011	30/11/2014
AUTH971389.01.01	Current	Undertake soil disturbance activities within a high risk erosion area in association with the construction and modifications of the Raglan wastewater treatment site	14/02/2005	14/02/2020
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

This report examines the level of compliance of Waikato District Council with the selected conditions of the resource consents.

2 BACKGROUND

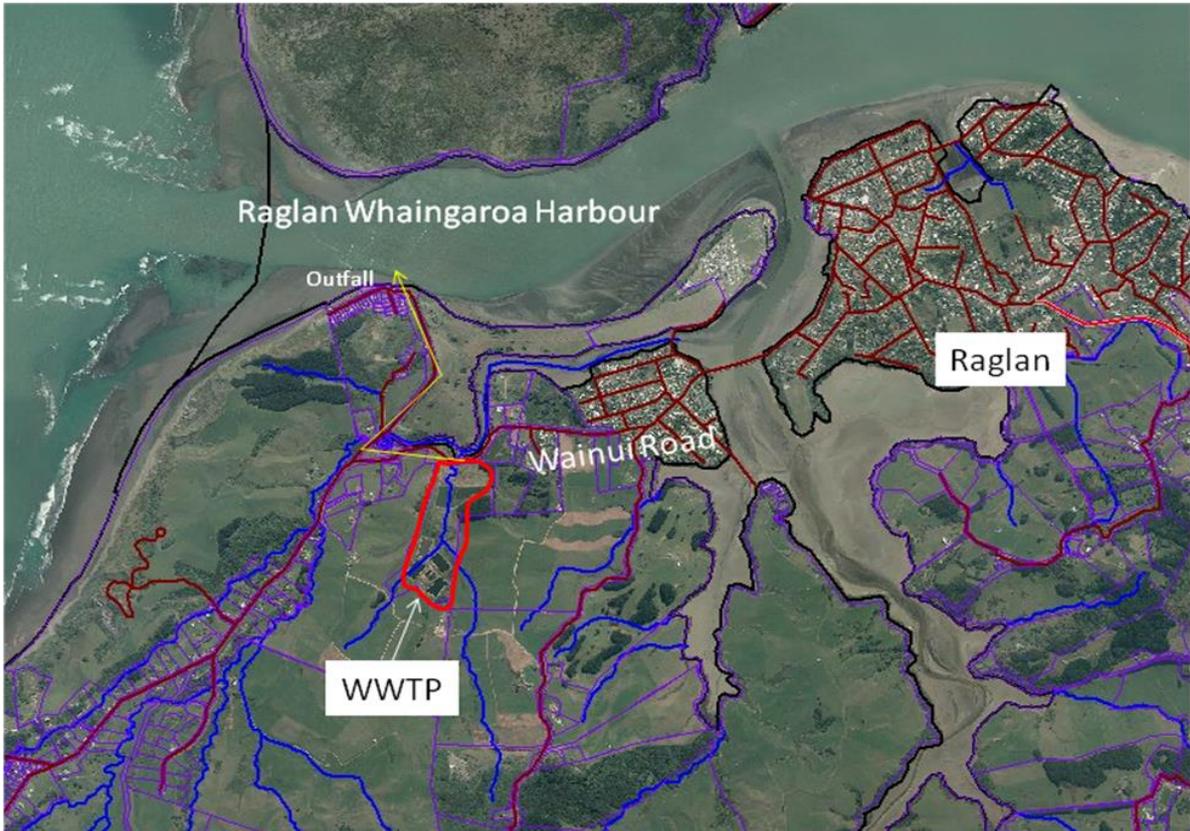
The Raglan wastewater treatment plant (WWTP) in Wainui Road receives, treats and discharges municipal wastewater from the Raglan Township and also the recently reticulated homes along the Whaanga Coast to Whale Bay.

Treatment consists of screening, anaerobic ponds (not currently in use), aerated ponds with aquamats, sealed holding pond 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 site has continued to have problems with suspended solids, enterococci and faecal coliforms meeting the compliance limits. However Waikato District Council have implemented measures, as reported in their annual report (doc ref 3576721), that should improve compliance in future.

The average daily discharge of treated effluent was 1,078m³ over the reporting period. A new sealed final effluent holding pond has been constructed and commissioned.



Location map (above) and aerial photo of site (below)





Newly commissioned sealed final effluent holding pond

2.1 PREVIOUS COMPLIANCE HISTORY

RA Number	Status	Date	Site Compliance
RA208313	Current	1/07/2015	Partial compliance
RA203719	Complete	24/03/2015	High level of compliance
RA199409	Complete	19/12/2013	Follow up to non-compliance
RA198789	Complete	21/11/2013	Partial compliance
RA194481	Complete	17/04/2013	High level of compliance
RA190953	Complete	28/12/2011	Partial compliance
RA189350	Complete	13/07/2011	Partial compliance
RA186849	Complete	11/08/2010	Significant non-compliance

3 COMPLIANCE ASSESSMENT

This audit assesses all the relevant consent conditions pertaining to this activity. Some administration based conditions have been omitted for brevity.

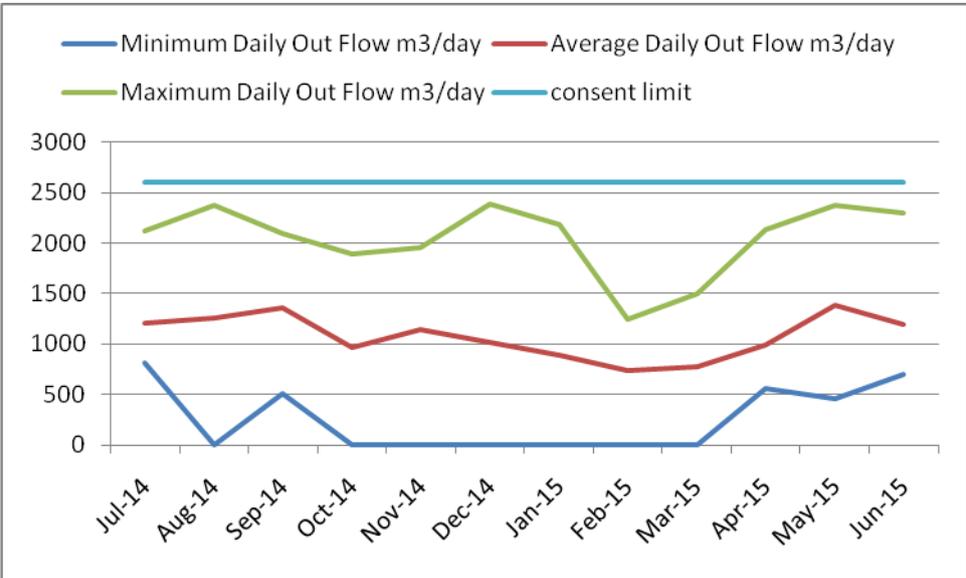
Unless otherwise specified in this document this assessment covers the period from **1 July 2014 to 30 June 2015**.

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 listed above and as assessed in the conditions below.
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	The consent holder states in their annual report that: <ul style="list-style-type: none"> • The site is suitably fenced to exclude livestock from accessing the wastewater treatment site.
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 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.
Evidence	• A Management and Contingency plan was submitted in June 2010 and accepted by Environment Waikato on 23 July 2010.

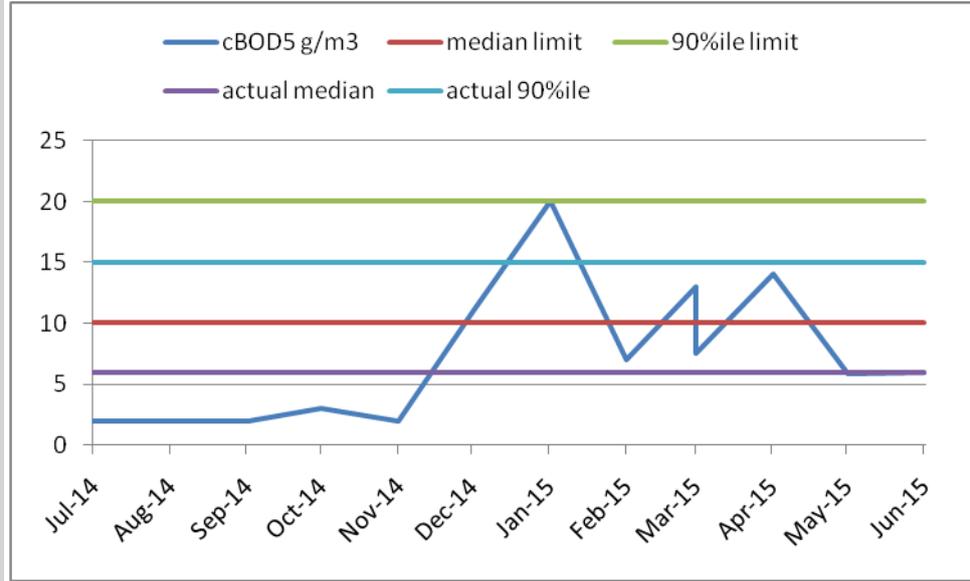
	<ul style="list-style-type: none"> • An updated version was accepted by Waikato Regional Council in December 2013 with the requirement to update contact details. • These details have been confirmed by Tainui hapu representatives and submitted to Waikato Regional Council in September 2014. • Treatment & disposal is generally in accordance with the approved management plan. • A copy of the updated O&M Plan was sent to WRC in September 2014. 	
Status Reasoning		
Action Required		Full compliance
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 set of contingency plans is included as part of the O&M plan however it has been identified that not all contingency scenarios are currently catered for.	
Status Reasoning		
Action Required	Investigate whether any recent issues on site are adequately covered by the contingency plan i.e. pumping outside of consented hours due to mechanical failure, excess rainfall causing lack of capacity within ponds etc	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>The consent holder states in their annual report that:</p> <ul style="list-style-type: none"> • Council's CRM database records all complaints from the public. There was one concern from the public during the consent year regarding the Raglan WWTP. 	
Status Reasoning	WRC is formally requesting a copy of the CRN for this incident	
Action Required	Please provide details of the complaint CRN to WRC as soon as practicable	Minor technical non-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	 <p>• Discharge volumes from the Raglan WWTP did not exceed the consented volume; peak discharge was 2,389m³.</p>
Status Reasoning	
Action Required	Full compliance
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. • A flow display panel visible to the public is installed on the roadside wall of the UV building. <p>Calibration certificate is dated 13 May 2014 however it also states on the certificate (doc ref 3078506) that the next calibration date due is 24 February 2015. this should be checked and confirmed as incorrect or correct by WDC with the company that undertook the calibration Calmaster (Jeff Thomas)</p>
Status Reasoning	
Action Required	Full compliance
10	<p>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.</p>
Evidence	<p>Information is provided as required.</p>
Status Reasoning	
Action Required	Full compliance
11	<p>The discharge of treated wastewater shall occur for a maximum of 5.5 hours per outgoing tide. The discharge may commence no earlier to 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.</p>
Evidence	<ul style="list-style-type: none"> • The treatment team have automated the system so that the pumps logic is set using an algorithm dictated by the NIWA tide charts. • The treatment team check the accuracy of these settings periodically. • There was one occasion during the 14/15 period that the plant discharged outside the normal consented period. That event occurred on the 14/15th May 2015. The event was notified and a report was supplied to WRC.
Status Reasoning	<p>There was failure in the system and a discharge occurred outside of consented hours in May 2015. A formal warning (doc 3425152) was issued in respect of this incident.</p>

Action Required		Low priority non-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	<ul style="list-style-type: none"> This data is recorded in the SCADA system. 																																																																		
Status Reasoning	it is difficult for the consent holder to provide this information to WRC due to the method used for recording this. Any particular period requested by WR can be provided as a screen shot from their SCADA system																																																																		
Action Required	Investigate a method of providing this data in a more easily accessible manner.	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	<ul style="list-style-type: none"> No oils, greases or foams have been observed during the reporting period. <p>An alleged report of scum in the Wainui Stream was investigated but found to be naturally occurring algae.</p>																																																																		
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) an 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	<p>The consent holder states in their annual report that:</p> <ul style="list-style-type: none"> Please see the Data Summary submitted with the annual report. Refer to the introduction section of the annual report with regard to TSS improvement initiatives. 																																																																		
	<table border="1"> <caption>Approximate data from the TSS graph</caption> <thead> <tr> <th>Month</th> <th>Total Suspended Solids (g/m3)</th> <th>Median Limit (g/m3)</th> <th>90%ile Limit (g/m3)</th> <th>Actual Median (g/m3)</th> </tr> </thead> <tbody> <tr><td>Jul-14</td><td>15</td><td>20</td><td>30</td><td>15</td></tr> <tr><td>Aug-14</td><td>10</td><td>20</td><td>30</td><td>10</td></tr> <tr><td>Sep-14</td><td>15</td><td>20</td><td>30</td><td>15</td></tr> <tr><td>Oct-14</td><td>45</td><td>20</td><td>30</td><td>45</td></tr> <tr><td>Nov-14</td><td>15</td><td>20</td><td>30</td><td>15</td></tr> <tr><td>Dec-14</td><td>60</td><td>20</td><td>30</td><td>60</td></tr> <tr><td>Jan-15</td><td>120</td><td>20</td><td>30</td><td>120</td></tr> <tr><td>Feb-15</td><td>60</td><td>20</td><td>30</td><td>60</td></tr> <tr><td>Mar-15</td><td>370</td><td>20</td><td>30</td><td>370</td></tr> <tr><td>Apr-15</td><td>40</td><td>20</td><td>30</td><td>40</td></tr> <tr><td>May-15</td><td>15</td><td>20</td><td>30</td><td>15</td></tr> <tr><td>Jun-15</td><td>10</td><td>20</td><td>30</td><td>10</td></tr> </tbody> </table>	Month	Total Suspended Solids (g/m3)	Median Limit (g/m3)	90%ile Limit (g/m3)	Actual Median (g/m3)	Jul-14	15	20	30	15	Aug-14	10	20	30	10	Sep-14	15	20	30	15	Oct-14	45	20	30	45	Nov-14	15	20	30	15	Dec-14	60	20	30	60	Jan-15	120	20	30	120	Feb-15	60	20	30	60	Mar-15	370	20	30	370	Apr-15	40	20	30	40	May-15	15	20	30	15	Jun-15	10	20	30	10	
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Status Reasoning	Continued exceedances of both the median and 90%ile consent limits for TSS																																																																		
Action Required	Undertake investigations and take action to reduce TSS to compliant levels	Medium 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



The consent holder states in their annual report that:
 • Please see the Data Summary in the annual report.
 • Please refer to the comments made in the Introduction section of the annual report.

Status Reasoning

Action Required

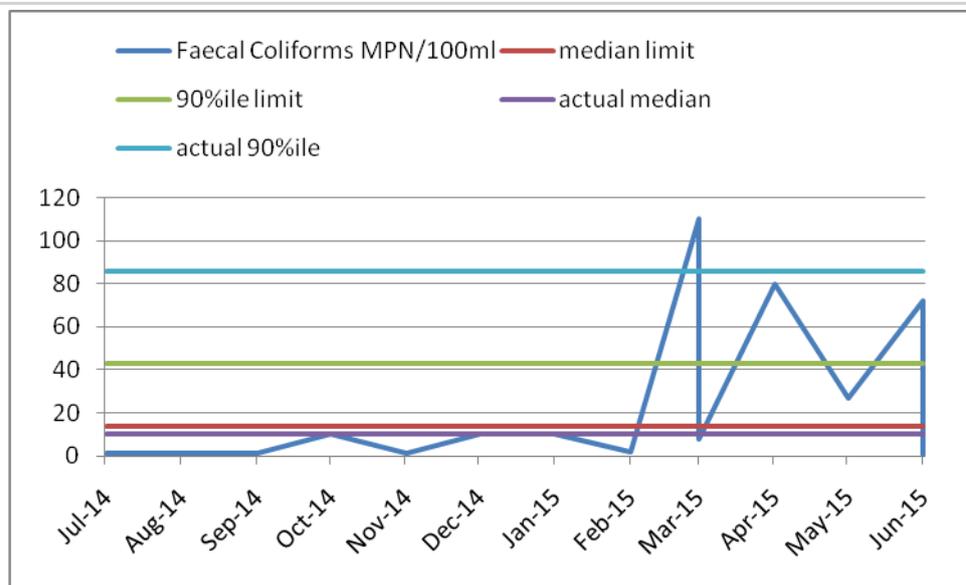
Full compliance

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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

The consent holder states in their annual report that:
 The plant discharge did not comply with the FC conditions for several reasons:
 1. The old storage pond grows algae and accumulates sludge. The solids carryover from the storage pond affects the UV performance. This issue has been resolved by installing the new fully lined storage pond system.
 2. The sample collected on the 17th March 2015 was not representative of the discharge. The sample was collected by manually starting the discharge system. The old storage pond was still in service and was almost empty. Some sludge from the pond floor was most likely dragged into the discharge hence the very high TSS and FC result. Installation of the new fully lined storage pond system prevents this situation from reoccurring.
 3. Prior to the installation of the new storage pond the plant discharge rate was normally 30L/s(approx.). The new storage pond system usually operates at 65L/s. this increased the UV dose demand despite the fact that the effluent quality has improved significantly. The UV system has now been fully refurbished and the wiper frequency increased. This has increased the performance of the UV system and the FC results are now well below the median consent limit.
 • Based on recent modelling work carried out by E-Coast (a Raglan consultancy), the health risks associated with the elevated FC results is extremely low.
 • Failed samples cause a non-compliance with the 90%ile consent limit.



Status Reasoning

3 failed samples cause a non-compliance with the 90%ile consent limit.

Action Required

Ensure that actions taken so far have resolved the issue of faecal coliforms samples exceeding the consent limit

Low priority non-compliance

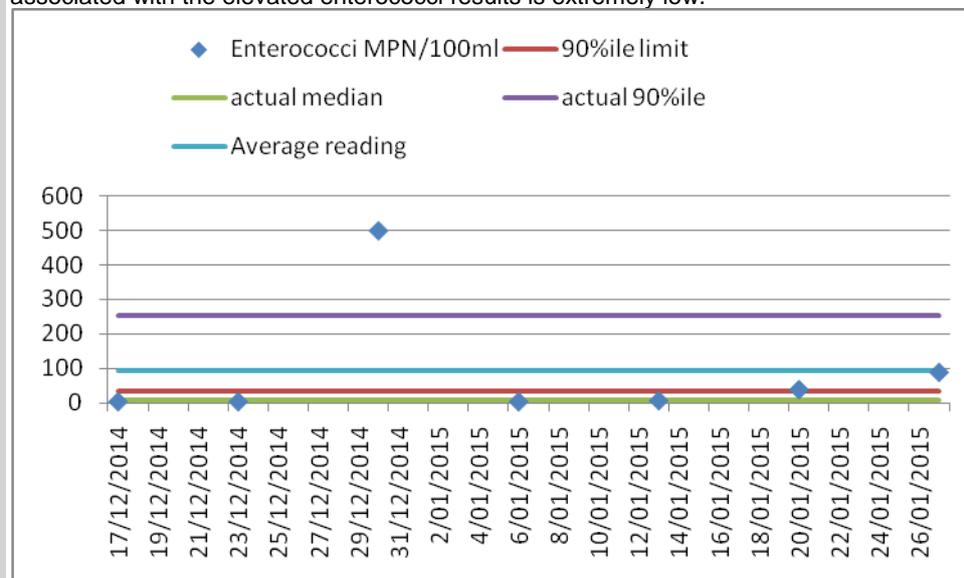
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The consent holder shall monitor the concentration of enterococci in the discharge at weekly intervals from 15 December to 30 January. The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the concentration 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

- The plant discharge did not comply with the enterococci conditions for several reasons:
 - The old storage pond grows algae and accumulates sludge. The solids carryover from the storage pond affects the UV performance. This issue has been resolved by installing the new fully lined storage pond system.
 - The sample collected on the 30th December 2014 was not representative of the discharge. The sample was collected when the UV and discharge pump were not operating. A second sample was taken for that month that represented the discharge.

Based on recent modelling work carried out by E-Coast (a Raglan consultancy), the health risks associated with the elevated enterococci results is extremely low.



Status Reasoning

Enterococci result for 30 December, 20th and 27th January 2015 were not compliant with the 90%ile limit for this summer period 2014/2015

Action Required	Ensure that actions taken so far have resolved the issue of enterococci samples exceeding the consent limit	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 suspended 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	annual report (doc 3576721) was submitted on 30 September 2015	
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	The consent holder states in their annual report that: <ul style="list-style-type: none"> • Suspended solids and bacteriological counts were outside consent limits on numerous occasions and these issues have been communicated with WRC. • A register of incidents is included in the data summary of this report. • Following the 14/15th May 2015 discharge event discussed under Condition 11 above, WRC identified that the notification process required some improvements. WDC have noted that comment and have improved the notification process. WDC keep WRC informed of any potential breaches of the consent limits	
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	<ul style="list-style-type: none"> • Suspended solids and bacteriological counts were outside consent limits on numerous occasions and these issues have been communicated with WRC. • A register of incidents is included in the data summary of this report. • Following the 14/15th May 2015 discharge event discussed under Condition 11 above, WRC identified that the notification process required some improvements. WDC have noted that comment and have improved the notification process. 	
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance:		Partial 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	The existing pipeline and outfall are operated and maintained in general accordance with the documents listed above and as assessed in the conditions below.
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	The consent holder endeavours to maintain the pipeline and outfall in a structurally safe condition at all times
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 constitute 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	no information relating to the outfall pipeline has been provided from which to make an assessment.
Status Reasoning	
Action Required	Not assessed
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 has been operated and maintained in general accordance with the documents listed above and as assessed in the conditions below
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	WRC has not received any complaints relating to odour from this activity during 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	<ul style="list-style-type: none"> • Council's CRM database records all complaints from the public. There was one concern from the public during the consent year regarding the Raglan WWTP • Based on the available data there were nil events which would have caused significant environmental effects during the reporting 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, 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.
Evidence	A site Operation and Management Plan (#3193452) has been submitted as required. The consent holder states in their annual report that: • An updated Raglan WWTP Management Plan was submitted to WRC in September 2014.
Status Reasoning	
Action Required	Full compliance
Authorisation Compliance: Full compliance	

4 SUMMARY OF COMPLIANCE

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

Authorisation	Authorisation Description	Compliance Status
AUTH123522.01.01	To remove a wastewater pipeline from over the Wainui Stream including associated disturbance and vehicle use in the CMA	Not assessed
AUTH971389.01.01	Undertake soil disturbance activities within a high risk erosion area in association with the construction and modifications of the Raglan wastewater treatment site	Not assessed
AUTH971390.01.01	Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	Partial compliance
AUTH971391.01.01	Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour	Full compliance
AUTH971392.01.01	Discharge odour to the air associated with all aspects of the existing & proposed treatment system	Full compliance

Overall Site Compliance: Partial compliance

5 DISCUSSION AND CONCLUSIONS

There was a discharge of treated wastewater outside of consented hours in May which resulted in Waikato District Council being issued with a formal warning. The incident highlighted a gap in the contingency planning for this type of incident and also a failing in notification protocols for this type of incident. It is expected that Waikato District Council will investigate the outcome of this incident and implement sufficient changes to reduce the risk of this type of incident occurring again.

There was a complaint reported to Waikato District Council during this compliance period relating to an unknown issue. Waikato Regional Council is formally requesting a copy of the details of this incident in line with condition 7 of RC971390 for the record.

There is still an issue with reporting the discharge cycle times due to the SCADA system employed by Waikato District Council. Waikato Regional Council can still request a specific period and a screen shot of the SCADA readout can be provided however this method is not ideal. If possible Waikato District Council should look at improving the reporting of discharge cycle information to Waikato Regional Council.

The non-compliance with TSS should be improved upon since the installation of the new sealed holding pond along with some other minor adjustments that have been made or are planned for this compliance period.

The bacterial parameter non-compliances should be improved following an improvement to the ultraviolet system undertaken recently.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition Number	Action Required
AUTH971390.01.01	6	Investigate whether any recent issues on site are adequately covered by the contingency plan i.e. pumping outside of consented hours due to mechanical failure, excess rainfall causing lack of capacity within ponds etc
AUTH971390.01.01	7	Please provide details of the complaint CRN to WRC as soon as practicable
AUTH971390.01.01	12	Investigate a method of providing this data in a more easily accessible manner.
AUTH971390.01.01	14	Undertake investigations and take action to reduce TSS to compliant levels
AUTH971390.01.01	16	Ensure that actions taken so far have resolved the issue of <i>faecal coliforms</i> samples exceeding the consent limit
AUTH971390.01.01	17	Ensure that actions taken so far have resolved the issue of enterococci samples exceeding the consent limit

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

It is disappointing that the operation of the Raglan WWTP has only achieved a compliance status of partial compliance for this compliance period. This is despite some significant improvements to the plant over the last year.

I recommend that a LETTER OF DIRECTION is issued to Waikato District Council requiring them to confirm what actions they intend to take to improve compliance and the timeframe these improvements are to occur within.

Edward Prince
Resource Officer - Infrastructure
Resource Use

Date:

7.1 Decision

I have reviewed this audit report and agree with the recommendations.

Hugh Keane
Team Leader - Infrastructure
Resource Use

Date:

APPENDIX 1

Compliance Status for Individual Conditions

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.