



File No: WAR970080 [30723] [23139] [20869]
14 December 2017

South Wairarapa District Council
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For: Lawrence Stephenson

Dear Lawrence

Compliance monitoring assessment for WAR970080 [30723] [23139] [20869]

Please find attached a compliance monitoring assessment for resource consent WAR970080. Below is a list of the non-compliances for the 2016/2017 period:

- Condition 1 – upgrades were not undertaken;
- Condition 15 – no inflow data was supplied and the outflow data supplied did not cover the whole compliance period;
- Conditions 17 through 20 – samples were missing for various dates;
- Condition 35 – only one meeting of the working party took place instead of two;
- Condition 37 – there was no site visit for the working party as required by this condition.

Without a full set of the required data being provided (as per the conditions of consent) it is difficult to assess compliance. Please ensure the current conditions of consent around monitoring are followed so that compliance with these conditions can be assessed.

It would also be appropriate for some commentary within the Annual Report outlining why data has not been provided and what measures have been put in place to prevent a reoccurrence.

If you have any questions about the monitoring of your consent or your compliance assessment please contact me on 06 826 1552.

Yours sincerely

Madeliene Playford
Resource Advisor, Environmental Regulation

GWRC compliance rating system

<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

Each consent receives a consent monitoring charge from GWRC.

This charge is made up of three parts:

- A *customer service charge* that covers the administrative cost of your consent(s);
- A *compliance monitoring charge* 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 *State of the Environment (SoE) charge* that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity.


For further information on consent monitoring charges, please see our *Resource Management Charging Policy*.

Compliance monitoring assessment

Consent No:	WAR970080	Date: 14 December 2017	Monitoring officer: Madeliene Playford
Activity:	To discharge contaminants to water, land and air associated with the operation of the Featherston wastewater treatment plant.		

Your compliance rating

Overall compliance summary for Featherston Wastewater Treatment Plant:

FAIR 	Overall fair management of site and consents. The consent holder struggled to meet aspects of their consent requirements. There were more than occasional breaches of consent conditions that manage environmental effects and/or issues with meeting administrative related consent conditions.
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WAR970080 [30723] [23139] [20869] – Featherston WWTP Compliance Report 2016/2017

Condition no.	Condition summary	Condition met?			Comment / action required
		Yes√	No X	NA	
1	General accordance		X		Upgrades that were proposed have not been completed
2	Discharge shall only be treated municipal wastewater from the township	√			
3	The volume of wastewater discharged to Donalds Creek shall not exceed 9,000m ³ /day dry weather flow and 12,000m ³ /day wet weather flow.	√			The highest outflow recorded was 9,907m ³ /d, with the maximum DWF (5day period less than 1mm) was 7,320m ³ /day
4	The treatment and disposal system shall be maintained in an efficient operating condition at all times. Details of all maintenance and any malfunctions or breakdowns shall be kept in a log and the log shall be made available to a warranted officer of the Wellington Regional council on request.	√			Citycare are contracted to operate the plant and have procedures in place to maintain the plant.
5	The consent holder shall maintain a complaints register. Copies of the register shall be made available to a warranted officer of the Wellington Regional council on request.	√			A complaints register is kept
6	Within two months of the commencement of this permit, there shall be no stock access to the discharge channel/maturation cells or Donalds Creek within the confines of the permit holder's disposal system.	√			There is no stock access.
7	Condition review			NA	
8	Cost recovery of review			NA	
9	Monitoring charges			NA	
10	At least one month prior to commencing any works associated with the maturation cells, UV treatment system, trickle filter system and floating treatment wetland system upgrade, the consent holder shall submit plans to the Manager, Environmental Regulation, Wellington Regional Council, for approval. These plans shall include but not be limited to: <ul style="list-style-type: none"> • Methodology of any construction works 	√			No change from previous reporting period.

	<ul style="list-style-type: none"> • Precise location of works • Proposed operational regime of upgrade works • Proposed monitoring regime. 				
11	The consent holder shall install a UV treatment system to provide interim improvement to microbiological water quality entering Donald's Creek from the treatment plant within four months of the grant date of the variation of consent.	√			UV was installed 15/12/2011
12	The consent holder shall construct a trial trickle filter system and any associated works and a trial floating treatment wetland system within four months of the grant date of the variation of consent.	√			Both systems were constructed, however the trickling filter system was moved to Carterton due to problems with reliable flow of raw sewage.
13	The consent holder shall commence the trickle filter trial and the floating treatment wetland trial no later than four months after the grant date of the variation of consent.	√			Wetland was moved to Martinborough WWTP
14	The consent holder shall monitor the performance of both the trial trickle filter system and the floating treatment wetland system for a period of at least 12 months. This should incorporate at least monthly testing of the wastewater for BOD, TSS and E.coli.			NA	
15	The consent holder shall continuously measure wastewater flows entering the Featherston Wastewater Treatment Plant and the volume of the treated wastewater discharged to Donald's Creek. The flow measuring devices shall be capable of continuously measuring wastewater flows of magnitudes up to and beyond the peak instantaneous flow rate, and shall be maintained to ensure that the measurement error is no more than ± 5%.		X		<p>Inflow data not included in Appendix C, therefore unable to assess compliance.</p> <p>Outflow data included in Appendix C covers the period 1st July 2016 to 30th June 2017. However, the reporting period for this Annual report is 1st June 2016 - 31st May 2017, therefore unable to assess compliance for the missing June 2016.</p> <p>Outflow meter was verified 27th July 2017 (attached in Appendix E).</p>
16	Treated wastewater discharged to Donald's Creek shall comply with the table in condition 16	√			<p>This condition has been assessed against sampling undertaken in August and November 2016 and February 2017.</p> <p>Based on these three samples, results were compliant:</p> <ul style="list-style-type: none"> • pH was within the acceptable range of 6-9.5, • BOD was below 40 g/m³, • TSS was below 175 g/m³, • <i>E.coli</i> was below 100,000 cfu/100mL, • Ammonia was below 18 g/m³,



				<ul style="list-style-type: none"> • TN was below 25 g/m³, • DRP was below 8 g/m³, • TP was below 10 g/m³.
17	At weekly intervals representative the consent holder shall take the following measurements of the treated wastewater immediately prior to discharge to Donald's Creek (see table in condition 17)		X	<p>Assessment is based on data available in quarterly reports as raw data (weekly monitoring results and flow data as Appendix B) not provided.</p> <p>Samples and visual observations of the treated wastewater were missed in the weeks of:</p> <ul style="list-style-type: none"> • 28th November 2016 • 26th December 2016 • 2nd January 2017 • 20th March 2017 • 10th April 2017 • 24th April 2017 • 1st May 2017 • 14th May 2017. <p>Where samples and visual observations were made, all parameters were covered.</p>
18	At three-monthly intervals in February, May, August and November each year, the consent holder shall collect representative grab samples of the treated wastewater immediately prior to discharge to Donald's Creek and have these analysed for (see table in condition 18)		X	<p>Sampling of the effluent occurred on the 11/08/2016, 1/11/2016, 27/02/2017 during the current reporting period (1 June 2016 – 31st May 2017). Sampling was not undertaken in May 2017. Instead, a sample was collected at the end of June 2017 (23/06/2017), outside this reporting period.</p> <p>In August 2016, samples were analysed for all parameters required under Condition 18. In November 2016 & February 2017, samples were analysed for all parameters required under Condition 18 except for Nitrite and TKN.</p> <p>Laboratory detection limits used are unknown. Recommend inclusion of detection limits in next annual report.</p>
19	At three-monthly intervals to coincide with wastewater sampling undertaken in accordance with condition 18, the consent holder shall collect representative water samples from Donald's Creek sufficiently upstream so as to avoid contamination from backflow of the discharge, but not more than 20 metres and approximately 100 metres downstream of the wastewater discharge outfall to the creek. The samples		X	<p>Samples were collected to coincide with wastewater sampling.</p> <p>Sampling occurred on the 11/08/2016, 1/11/2016, 27/02/2017 during the current reporting period (1 June 2016 – 31st May 2017).</p> <p>Sampling was not undertaken in May 2017. Instead, a sample was collected at the end of</p>

	shall be analysed for (see table in condition 19)				<p>June 2017 (23/06/2017), outside this reporting period.</p> <p>Samples were analysed for all parameters required under Condition 18 with the following exceptions:</p> <ul style="list-style-type: none"> • Nitrate for the downstream site in November 2016 is missing from the data provided. No explanation is given. • Nitrite for both upstream and downstream sites in February 2017 are missing from the data provided. Likely not analysed for. <p>Laboratory detection limits used are unknown. Recommend inclusion of detection limits in next annual report.</p>
20	At three-monthly intervals to coincide with the monitoring undertaken in accordance with condition 18, the consent holder shall make the following in-situ measurements using field equipment calibrated in accordance with the manufacturer's instructions (see table in Condition 20)		X		<p>Monitoring undertaken in accordance with Condition 18, included in-situ measurements for temperature, DO, pH, conductivity and black disc, carried out at sites upstream and downstream of the discharge point on 11/08/2016, 1/11/2016 and 27/02/2017. Sampling was not undertaken in May 2017.</p> <p>No mention is made in the annual report of calibration/validation protocols for field equipment. We recommend these are included in future reports.</p>
21	Once in either 2010 or 2011, during the period 31 January to 30 April inclusive and following at least a two week period without a significant flood event, an appropriately experienced and qualified freshwater ecologist shall carry out a quantitative ecological survey			NA	Not applicable to this reporting [period, only required to be undertaken once in either 2010 or 2011.
22	Periphyton survey			NA	Not applicable to this reporting [period, only required to be undertaken once in either 2010 or 2011.
23	Macroinvertebrate survey			NA	Not applicable to this reporting period, only required to be undertaken once in either 2010 or 2011.
24	The results of the ecological survey shall be reported in writing to Manager Environmental Regulation, Wellington Regional Council by 1 June of the year in which the survey was undertaken.			NA	
25	The consent holder in consultation with Greater Wellington shall establish an	√			Gauging at 3 monthly intervals of upstream and downstream flows began early 2010.



	appropriate flow gauging option for Donalds Creek. Stream flow gauging in Donalds Creek shall commence no later than 31 December 2009. Results shall be submitted quarterly in accordance with condition 31. The chosen gauging method and monitoring regime shall be to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.				Continuous gauging is being investigated.
26	There shall be no discharges to air that are noxious, dangerous, offensive or objectionable resulting from the operation of the Featherston wastewater treatment plant beyond the site boundary.	√			No odour complaints received
27	The consent holder shall erect and maintain appropriate signage	√			Previously approved. Signage being maintained.
28	The signage shall identify the nature of the discharge, 24 hr contact details and be visible to the public	√			Previously approved. Signage being maintained.
29	The access gate on Longwood West Road shall remain locked at all times to prevent public access.	√			Padlocked and chained
30	All sampling techniques employed in respect of the conditions of this permit shall be acceptable to the Wellington Regional Council. Unless specifically approved otherwise in writing by the Manager Environmental Regulation, Wellington Regional Council, all analytical testing undertaken in connection with this permit shall be performed by a laboratory that is IANZ registered for the analytical tests.	√			Testing undertaken by ELS – IANZ registered lab.
31	Quarterly reporting requirements	√			
32	Annual reporting requirements	√			
33	Within two months of commencement of this consent the consent holder shall establish a Working Party which shall include but not be limited to representatives of the consent holder, submitters, iwi, Department of Conservation, Wellington Fish and Game, Wairarapa Public Health and the Featherston Community Board.	√			
34	Within two months of the granting of this consent, the consent holder shall commence an investigation into the options for land treatment and disposal of	√			Consent renewal currently in progress

	wastewater. This investigation shall be undertaken in consultation with the Working Party.				
35	Meet with Working Party every six months		X		Only one meeting has taken place (March 2017)
36	36. The consent holder shall produce a final report evaluating long-term wastewater treatment and disposal options, including a detailed timeframe for implementation of the preferred option. The report shall be submitted to the Manager Environmental Regulation, Wellington Regional Council, by no later than 1 June 2012.	√			Report completed and submitted 1 June 2012
37	SWDC shall host an annual site visit for the working party.		X		The annual site visit was not undertaken. GWRC feels this is still important and could aid with the consenting process.