



File No: WAR960286

11 October 2013

Jean-Paul Irwin
South Wairarapa District Council
19 Kitchener Street
P O Box 6
Martinborough 5741

Dear Jean-Paul

Compliance monitoring report 2012/2013 for WAR960286 [21309, 20866]

Consent holder:	South Wairarapa District Council
Description:	To discharge treated sewage from the Greytown oxidation ponds to the Papawai Stream and also to groundwater as minor seepage from the base of these ponds
Location:	Papawai Stream, adjacent to Greytown Oxidation Ponds, Pah Road, Greytown
Consent type:	Discharge to land, water & air

I inspected your site and audited your consents on 10 May and throughout September/October 2013. Your compliance assessment for 2012/2013 is below.

A detailed assessment of all conditions is attached.

Annual compliance rating

WAR960286 [20869] has a rating of **significant non-compliance** for 2012/2013.

You have received this rating because conditions 9, 12, 14, 15, 20 & 25 were not complied with.

WAR960286 [23139] has a rating of **technical non-compliance** for 2012/2013.

You have received this rating because conditions 9 & 11 were not complied with. Compliance ratings are explained overleaf.

The Annual Report was sent through to our Environmental Science Department for comment and these have been inserted below:

Environmental Science generally agree with interpretation of the data presented in the report and the conclusions that there are significant adverse impacts on some aspects of water quality (eg, ammoniacal nitrogen and dissolved reactive phosphorus) and the instream macroinvertebrate community as a result of the WWTP discharge.

Some additional results are presented in the annual report based on a low flow assessment undertaken (by Forbes ecology in July 2013), however, this report is not fully referenced within the annual report. Given that results from additional sources are being presented it would be appropriate for this low flow assessment report to be referenced (and this report may help us in future effects assessments).

In regards to the macroinvertebrate and water quality monitoring reports, more appropriate and up-to-date methodology is available than the Edgar (1994) methodology that was followed (eg, Stark et al. 2001), and I note that the correspondence and discussion with GWRC staff on appropriate methodology that is stated to have occurred in these reports refers to Brett Stansfield who has not worked at GWRC for well over a decade.

While I realise that there may be some merit in using a methodology consistent with previous years (eg, for trend analysis), I feel that is well worth revisiting the sampling methodology that is currently being used to make sure it is fit for purpose. Further, some methodology is not stated, such as how soft-bottomed sites were sampled (three of the four sites sampled are soft-bottomed sites). It is probably also worth reviewing the invertebrate metrics used, including the use of both soft and hard-bottomed MCI and QMCI variants in the interpretation of data.

Action required by consent holder

On this occasion we have decided not to take any further enforcement action because this non-compliance can be addressed and remedied in your replacement application WAR080254.

However, we may not be so lenient should you be responsible for any further breaches of the Resource Management Act 1991 (RMA). Accordingly, you should to take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your consent.

Consent supervision and monitoring charge and next compliance assessment

You will receive an annual consent supervision and monitoring charge on a quarterly basis. Components of this charge are explained at the end of this letter.

Your consents will continue be inspected and assessed regularly throughout the year.

If you have any questions about the monitoring of your consent or your compliance assessment please contact Aimee Charmley on 06) 826 1556.

Yours sincerely

Aimee Charmley
Senior Resource Advisor, Environmental Regulation

Greater Wellington compliance rating system

Grade	Rating	Explanation and examples	Likely action required of consent holder
A	Full compliance	<ul style="list-style-type: none"> All administrative conditions assessed are met (e.g. supplying information and/or records) All effects based and best practice conditions assessed are met (e.g. complying with any maximum limits) 	<ul style="list-style-type: none"> None – 100% compliance with all consent conditions assessed
B	Technical non-compliance	<ul style="list-style-type: none"> Failure to supply information and/or keep adequate records Failure to adequately notify GW of works Minor works outside scope of consent issued but within scope of environmental effects considered when consent processed 	<ul style="list-style-type: none"> Action by the consent holder within specified timeframe
C	Environmental non-compliance	<ul style="list-style-type: none"> Breach of effects based or best practice consent condition with minor actual or potential environmental effects Breach of effects based or best practice consent condition with more than minor actual or potential environmental effects that can be fixed immediately Works outside scope of consent issued where environmental effects not considered 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff
D	Significant non-compliance	<ul style="list-style-type: none"> Persistent Grade C breach of same condition and failure to respond to requests for compliance Significant breach of effects based or best practice conditions that causes environmental effects (e.g. unauthorised discharge from site to water, significant disturbance to sensitive receiving environment or site on a scale not envisaged by consent, significant breach of water quality/quantity limit) Significant works outside scope of consent issued that causes environmental effects 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff

Notes

- The actions and examples are a guide for compliance assessment. Depending on the consideration of any mitigating or aggravating factors, a more stringent or less stringent grading may be applied.
- If your consent falls within Grade B, C, or D, additional non-standard compliance charges apply which are based on actual and reasonable time spent by Greater Wellington staff.
- Please be aware that Greater Wellington has a responsibility to enforce the Resource Management Act 1991. Failure to comply with the Act can result in an infringement notice with a maximum fee of \$1,000 or prosecution with a maximum fine of \$600,000 for a company or \$300,000 or two years imprisonment for an individual. Accordingly, all necessary steps must be taken to ensure you comply with your obligations under the Act.

Consent supervision and monitoring charges

Each consent receives either an annual or one-off consent supervision and monitoring charge from Greater Wellington.

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*. This is only applied in cases where Greater Wellington monitors resource use in your area to ensure the sustainable management of that resource.

For further information on compliance charging, please see the Greater Wellington *Resource Management Charging Policy (2011)*.

Compliance monitoring report 2011/2012 – assessment of conditions

WAR960286 - Discharge to land [23139] and water [30723]

Condition		Condition met?			Comments
		Yes!	No √	NA	
1	The location, volumes, rates of discharge, and character of the discharge of the treated sewage is in accordance with Assessment of Environmental Effects, Effluent Discharge from Greytown Sewage Ponds to Papawai Stream, dated 16 September 1998 prepared for South Wairarapa District Council by Beca Steven, Consulting Environmental Engineers	!			Full compliance
2	The permit holder shall enter into a programme of investigation and community consultation that should lead to the identification and implementation of a preferred long-term sewage effluent disposal option. The permit holder shall evaluate options and decide on a preferred option before 1 July 2005?	!			Full compliance
3	Transfer of Permit			NA	
4	In the event of any failure of the Greytown oxidation ponds facility that would result in any deterioration in quality of effluent discharging to Papawai Stream and be in breach of any condition of this permit, the permit holder shall: (a) Take immediate steps to remedy and mitigate any adverse effects on the environment caused by any releases of such effluent. Such steps shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council; and (b) Immediately notify the Medical Officer of Health (C/- the Health Protection Officer, Choice Health) in accordance with the Public Health Service's Response Manual for Sewage Discharges; and (c) Notify the Manager, Planning and Resources, Wellington Regional Council, within 24 hours after the malfunction of the oxidation ponds facility has been detected; and (d) If required by the Manager, Planning and Resources, Wellington Regional Council, provide within 24 hours a written report to the Manager, detailing, manner and cause of that malfunction and the nature of the released effluent, and the steps taken (and being taken if appropriate) to remedy and control that release, and to prevent any further such releases of untreated or partially treated effluent.	!			Full compliance
5	Rock groyne and/or permeable membrane baffles in the tertiary oxidation pond.	!			Full Compliance
6	Risk Communication Strategy	!			Full Compliance

7	Signage	!			Full Compliance
8	All methods and procedures for monitoring shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council. All analysis carried out for conditions 12, 17, and 18 shall be undertaken using standard methods as detailed in the "Standard Methods for the Examination of Water and Wastewater, 1995" 19th edition by American Public Health Association (A.P.H.A) and American Water Works Association (A.W.W.A) and Water Environment Federation (W.E.F) and any subsequent updates.	!			Full Compliance
9	Commencing within four months after the date of commencement of this permit and at four monthly intervals thereafter or on request, the permit holder shall forward all results of the sampling undertaken for compliance with conditions 17 and 18 to the Manager, Planning and Resources, Wellington Regional Council.		∇		Technical non-compliance
10	The permit holder shall by 1 July 2001 assign and maintain a flow meter to the Greytown oxidation ponds facility. Except from time to time and to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council, when that flow meter is transferred to measure influent flow of the primary pond, the permit holder shall continuously monitor the volumes of wastewater discharged to Papawai Stream and record that discharge. The aforesaid records shall be forwarded to the Manager, Planning and Resources, Wellington Regional Council, upon request.	!			Full Compliance
11	The permit holder shall demonstrate to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council, within six months of the first anniversary of the date of commencement of this permit, whether the oxidation ponds are reasonably well sealed.			NA	Not applicable to this compliance reporting year.
12	The permit holder shall twice yearly in March and September, collect a grab sample of the discharge at the discharge point in Condition 16 and also grab samples of the waters of the Papawai Stream at or about a site 30 metres downstream of the discharge point and at a site upstream from that point. All said samples shall be representative and analysed for the following water quality criteria: <ul style="list-style-type: none"> • pH • Temperature °C • Ammoniacal nitrogen (NH4+-N) g/m³ • Dissolved reactive phosphorus g/m³ • E. Coli per 100ml The monitoring locations shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council, and the permit holder shall provide the results of the monitoring to the Manager annually.		∇		Technical non-compliance

13	The permit holder shall keep operational logs that identify changes in the operating procedures and unusual events that occur at the Greytown District oxidation ponds. These records and the results of monitoring undertaken on the effluent quality within the ponds shall be supplied to the Manager, Planning and Resources, Wellington Regional Council, upon request.	!			Full Compliance
14	Macroinvertebrate monitoring of the Papawai Stream at sites upstream and downstream of the outfall twice yearly in March and September and determine MCI values. Results to be provided annually.		∇		Technical non-compliance
15	The discharge shall not cause any of the following effects in Papawai Stream after reasonable mixing: <ul style="list-style-type: none"> • The production of any conspicuous oil or grease films, scums or foams or floatable or suspended material; • Any conspicuous change in colour or visual clarity; • The rendering of freshwater unsuitable for consumption by farm animals; • Any significant adverse effect on aquatic life; • A change of more than 3° Celsius in the natural temperature of the water. <p>"Reasonable mixing" shall be deemed to have occurred within 20 metres of the effluent discharge point (the outfall) to Papawai Stream as measured downstream in the active channel of that stream.</p>		∇		Significant non-compliance
16	The permit holder shall provide to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council, an appropriate place at the outlet of the tertiary pond to sample the treated effluent before it enters the waters of Papawai Stream.	!			Full Compliance
17-19	Effluent Standards prior to 2003			NA	
20	Effluent Standards after 1st August 2000. Compliance based on a running geometric mean and 90 percentile calculated using 40 test results: <p>(a) Biochemical Oxygen Demand: The geometric mean of 40 consecutive BOD₅ sample values shall not exceed 30g/m³ and no more than 10 percent of 40 consecutive values shall exceed 60 g/m³.</p> <p>(b) Suspended Solids: The geometric mean of 40 consecutive suspended solids sample values shall not exceed 45 g/m³ and no more than 10 percent of 40 consecutive values shall exceed 90 g/m³.</p> <p>(c) Faecal Coliforms: The geometric mean of 40 consecutive faecal coliform values shall not exceed 5,000 per 100 millilitres and no more than 10 percent of 40 consecutive values shall exceed 25,000 per 100 millilitres.</p>		∇		Environmental non-compliance
21	Before 1 July 2002 the permit holder shall complete a programme of investigation that should identify the source(s) that contribute to the anomalous phosphorus in the Greytown District wastewater			NA	Not relevant for this compliance year.

	discharge. Before 1 July 2003, the permit holder shall take all practicable steps to ensure that that phosphorus content is mitigated or minimised. Before 1 August 2003, the permit holder shall, in writing, notify the Manager, Planning and Resources, Wellington Regional Council of the results of that investigation, and also of those steps which have been taken.				
22	Review of Conditions			NA	
23	Change of Conditions			NA	
24	Term of Consent			NA	
25	The permit holder shall establish a "Community Advisory Group" to work with the permit holder in developing and implementing a preferred long-term sewage effluent disposal solution. The permit holder shall invite a representative from both Ngati Kahungunu ki Wairarapa Maori Executive Taiwhenua Inc., and Rangitaane O Wairarapa Inc.		√		Technical non-compliance

Compliance monitoring report 2011/2012 – assessment of conditions

WAR960286 [20866] – Discharge to air

Condition	Condition met?			Comments	
	Yes!	No √	NA		
1	Consent term			NA	
2	The location, design, implementation and operation of the works shall be in accordance with the resource consent application WAR 960286 and its associated plans and documents lodged with the Wellington Regional Council on 8 November 2000, and the further information dated 14 January 2003, unless otherwise specified by a consent condition.	!			Full compliance
3	Consent Copy to Operator			NA	
4	There shall not be any objectionable or offensive odour or aerosols discharged to the extent that they cause an adverse effect beyond the boundary of the property on which this consent is exercised.	!			Full compliance
5	<p>The on-site processes shall be operated, the operations supervised and the plant maintained in such a manner as to ensure that the emissions of contaminants into the air is kept to a practicable minimum by using best practical option principles. In particular, all practical steps shall be taken to minimise the production and release of contaminants or odour, which are noxious, offensive or objectionable arising from the operation of the sewage treatment system to an extent such that it has, or is likely to have, an adverse effect on the environment. The determination of malodour shall be within 50 metres of any dwelling existing as at the date of this consent on land adjacent to land of the consent holder.</p> <p>Note – An odour shall be considered to be offensive or objectionable if an appropriately experienced Wellington Regional Council officer deems it so after having regard to:</p> <p>(a) frequency, intensity, duration and location of the effects of odour;</p> <p>(b) relevant written advice or a report from an Environmental Health officer, or a territorial or health authority.</p>	!			Full compliance
6	Complaints record	!			Full compliance
7	Operational Logs	!			Full compliance
8	The consent holder is to submit a site management and maintenance plan to the Wellington Regional Council within one month of the commencement of this consent. This plan will detail all measures necessary to comply with the conditions of this	!			Full compliance

	<p>consent, including:</p> <ul style="list-style-type: none"> • Maintenance and inspection of the sewage treatment system; • Monitoring of the operation; • Mitigation steps to be taken in the event of plant failure likely to cause off-site effects; • How such incidents are to be advised to neighbouring properties; • How the consent holder will deal with complaints from parties affected by off site effects; and • Staff members responsible for these measures. <p>Any updating of the site management and maintenance plan is to be notified to the Manager, Planning and Resources, within one month of any changes being made.</p>				
9	<p>Site operations shall be conducted in accordance with the site management and maintenance plan and the odour response logic chart (drawing number C 2033/1/0), but with the following amendment:</p> <ul style="list-style-type: none"> • The dissolved oxygen threshold at which daily monitoring is to be carried out shall be 0.5 g/m³ or less, when tested at 8.00am. 	!	∇		Technical non-compliance
10	<p>The oxidation ponds must be maintained in an aerobic state at all times.</p>	!			Full compliance
11	<p>A compliance schedule is to be established and maintained throughout the term of this consent. The compliance schedule must monitor the stated activities and environmental performance specified in:</p> <ul style="list-style-type: none"> • the site management plan; • the conditions of this consent. <p>The compliance schedule must record:</p> <ul style="list-style-type: none"> • all site inspections; • compliance (or otherwise) with the conditions of this consent; • activities undertaken (including maintenance). <p>The compliance schedule must be signed off by the inspecting officer, and record the date of inspection. The compliance schedule must also record any remedial work(s) to be carried out, and set out the programme to undertake the required actions. If so requested by the Manager, Planning and Resources, Wellington Regional Council, the consent holder shall provide a copy of the compliance schedule.</p>		∇		Technical non-compliance
12	<p>All methods and procedures for monitoring shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council. All sampling and analysis of the sewage effluent carried out to meet the requirements of this consent shall be undertaken using standard methods as detailed in the "Standard Methods For The Examination of Water and Wastewater, 1995" 19th edition by American Public Health Association (A.P.H.A), and American Water Works Association (A.W.W.A), and Water Environment Federation (W.E.F) and any subsequent updates.</p>	!			Full compliance

13	<p>In the event of any failure of the Greytown oxidation ponds facility that would result in any discharge of to air, and be in breach of any condition of this consent, the Consent Holder shall:</p> <p>(a) Take immediate steps to remedy and mitigate any adverse effects on the environment caused by the discharge of such noxious odour; and,</p> <p>(b) Notify the Manager, Planning and Resources, Wellington Regional Council, within 24 hours after the malfunction of the oxidation ponds' facility has been detected; and,</p> <p>(c) If required by the Manager, Planning and Resources, Wellington Regional Council, provide within 24 hours a written report to the Manager, detailing, manner and cause of that malfunction and the nature of the discharge to air, and the steps taken (and being taken if appropriate) to remedy that discharge.</p>			Full compliance
14	Review of Conditions		NA	
15	Change of Conditions		NA	
16	Resource Management Charges		NA	



File No: WAR970080
9 October 2013

Jean-Paul Irwin
South Wairarapa District Council
P O Box 6
Martinborough 5741

Dear Jean-Paul,

Compliance monitoring report 2012/2013 for WAR970080 [30723, 23139, 20869]

Consent holder:	South Wairarapa District Council
Description:	To discharge contaminants to water, land and air associated with the operation of the Featherston Wastewater Treatment Plant
Location:	Longwood Road, Featherston
Consent type:	Discharge to water, land and air

I inspected your site on 16 January 2013 and audited your reports through August and September 2013. Your compliance assessment for 2012/2013 is below.

A detailed assessment of all conditions is attached.

Annual compliance rating

WAR970080 [30723, 23139, 20869] has a rating of **environmental non-compliance** for 2012/2013.

You have received this rating because conditions 1, 2, 14, 17, 35 & 37 were not complied with. Compliance ratings are explained overleaf.

The Annual Report was sent through to our Environmental Science Department for comment and these have been inserted below:

Overall the standard of the report was pretty poor quality with an 'average' analysis at best and it was not easy to follow. The annual report states that "Nitrogen and phosphorus based contaminants, are consistently, significantly higher downstream than upstream. While parameters: biochemical oxygen demand and suspended solids, are only slightly higher downstream than upstream." While I agree with this interpretation, it is very limited and is not carried through to the overall summary of the annual report, which I think would be quite useful (eg, as with data collected previously, the last year of monitoring data indicates that the Featherston WWTP is still having a significantly adverse impact on Donald's Creek and results in significant increases inetc.).

I think it would also be good for the annual report to have a tabulated summary of the data contained within the report (at least for the last year of data collected). While the graphs can be

useful, having the three monitoring sites (upstream, downstream and discharge) make it at times very hard to determine what is going on (eg, often the discharge has a much higher concentration of a particular variable so the scale has to be large to incorporate this). While a spread sheet of appended data is provided, this is a bit of a mess.

Some simple statistics could also be used to confirm upstream and downstream differences and could also be used to inform whether the trends commented on are real or not (ie are they statistically significant). In regards to the trends, some consideration of the effects of flow on the potential trends commented on is probably warranted. Given that Condition 32 asks for some 'critical analysis' in terms of adverse environmental effects I don't think this is asking too much.

Action required by consent holder

On this occasion we have decided not to take any further enforcement action because this non-compliance can be addressed and remedied in your replacement application WAR120294.

However, we may not be so lenient should you be responsible for any further breaches of the Resource Management Act 1991 (RMA). Accordingly, you should to take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your consent.

Consent supervision and monitoring charge and next compliance assessment

You will receive an annual consent supervision and monitoring charge on a quarterly basis. Components of this charge are explained at the end of this letter.

Your consents will continue be inspected and assessed regularly throughout the year. .

If you have any questions about the monitoring of your consent or your compliance assessment please contact Aimee Bishop on 06) 826 1556.

Yours sincerely

Aimee Charmley
Senior Resource Advisor, Environmental Regulation

Greater Wellington compliance rating system

Grade	Rating	Explanation and examples	Likely action required of consent holder
A	Full compliance	<ul style="list-style-type: none"> All administrative conditions assessed are met (e.g. supplying information and/or records) All effects based and best practice conditions assessed are met (e.g. complying with any maximum limits) 	<ul style="list-style-type: none"> None – 100% compliance with all consent conditions assessed
B	Technical non-compliance	<ul style="list-style-type: none"> Failure to supply information and/or keep adequate records Failure to adequately notify GW of works Minor works outside scope of consent issued but within scope of environmental effects considered when consent processed 	<ul style="list-style-type: none"> Action by the consent holder within specified timeframe
C	Environmental non-compliance	<ul style="list-style-type: none"> Breach of effects based or best practice consent condition with minor actual or potential environmental effects Breach of effects based or best practice consent condition with more than minor actual or potential environmental effects that can be fixed immediately Works outside scope of consent issued where environmental effects not considered 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff
D	Significant non-compliance	<ul style="list-style-type: none"> Persistent Grade C breach of same condition and failure to respond to requests for compliance Significant breach of effects based or best practice conditions that causes environmental effects (e.g. unauthorised discharge from site to water, significant disturbance to sensitive receiving environment or site on a scale not envisaged by consent, significant breach of water quality/quantity limit) Significant works outside scope of consent issued that causes environmental effects 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff

Notes

- The actions and examples are a guide for compliance assessment. Depending on the consideration of any mitigating or aggravating factors, a more stringent or less stringent grading may be applied.
- If your consent falls within Grade B, C, or D, additional non-standard compliance charges apply which are based on actual and reasonable time spent by Greater Wellington staff.
- Please be aware that Greater Wellington has a responsibility to enforce the Resource Management Act 1991. Failure to comply with the Act can result in an infringement notice with a maximum fee of \$1,000 or prosecution with a maximum fine of \$600,000 for a company or \$300,000 or two years imprisonment for an individual. Accordingly, all necessary steps must be taken to ensure you comply with your obligations under the Act.

Consent supervision and monitoring charges

Each consent receives either an annual or one-off consent supervision and monitoring charge from Greater Wellington.

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*. This is only applied in cases where Greater Wellington monitors resource use in your area to ensure the sustainable management of that resource.

For further information on compliance charging, please see the Greater Wellington *Resource Management Charging Policy (2011)*.

Compliance monitoring report 2012/2013 – assessment of conditions

WAR970080 [30723, 23139, 20869]

Condition	Condition met?			Comments	
	Yes!	No √	NA		
1	States that the location, design, upgrading and operation of the plant shall be in accordance with the application for consent, or approved variations.		√		Environmental Non-Compliance
2	Specifies that the discharge shall be as per the resource consent application and associated plans and documents submitted.		√		Environmental Non-Compliance
3	Requires the volume of wastewater discharged to Donald's Creek not to exceed 9,000 cubic metres per day dry weather flow and 12,000 cubic metres per day wet weather flow.	!			Full compliance
4	Requires the treatment and disposal system to be maintained in an efficient operating condition and records to be kept of malfunctions and breakdowns.	!			Full compliance
5	A complaints register is required to be maintained, this is the case and no complaints were recorded by Transfield for SWDC during the reporting period.	!			Full compliance
6	No stock access around the maturation ponds is required	!			Full compliance
7	These are administrative conditions and do not require reporting.			NA	
8	These are administrative conditions and do not require reporting.			NA	
9	These are administrative conditions and do not require reporting.			NA	
10	In the event of any upgrades to the plant listed SWDC shall notify GW at least one month in advance	!			Full compliance
11	Requires the installation of a UV treatment system within 4 months of the granting of the consent variation (12 March 2011).			NA	UV plant was installed and operational 15/12/2011. Installation was not completed within specified time period. Not assessed within this compliance year.
12	Requires installation trickle filter system and floating wetland treatment within 4 months of the granting of the consent variation (12 March 2011).			NA	Trickle filter system and floating wetland system were both installed by 05/10/2010. However the trickle filter system was abandoned and relocated to Carterton. A consent variation was not applied for. Not assessed within this compliance year.
13	Requires the commencement of trickle filter system and floating wetland treatment within 4 months of the granting of the consent variation (12 March 2011).			NA	Trickle filter system was operational however, it was abandoned and relocated to Carterton. The floating wetland system has been operational since 31 st August 2010. Not assessed within this compliance year.
14	Requires monitoring of the performance of the trickle filter trial and floating wetland treatment for at least 12 months. This should include at least monthly testing of the wastewater for BOD, TSS and E.coli.		√		This has not been complied with trickle filter system was abandoned and relocated to Carterton. Technical Non-Compliance
15	Continuous monitoring of the inflow and outflow from the plant is required	!			Full Compliance
16	Treated wastewater discharged into Donalds Creek is to meet the quality standards set out in the table in the consent	!			All parameters that were measured met the criteria. Full compliance

17	Weekly monitoring of the wastewater prior to discharge into Donalds Creek is required		√		Technical Non-Compliance
18	3 monthly monitoring of the wastewater prior to discharge into Donalds Creek is required	!			Full compliance
19	3 monthly monitoring of upstream and downstream samples were required	!			Full compliance
20	3 monthly monitoring of the tabled parameters were required	!			Full compliance
21	These conditions cover an upstream and downstream survey of the periphyton and macroinvertebrates, which was completed by Brian T Coffey and Associates on 13 April 2010 and submitted to GWRC in May 2010.	!			Full compliance The report concludes that the discharge is having a significant adverse effect on the aquatic ecosystem of the receiving environment: "The oxidation pond discharge to Donald's Creek was associated with a conspicuous change in water clarity due to high chlorophyll concentration in the oxidation ponds and increased embeddedness of the grave substrate in Donalds Creek due to suspended solids discharged from the oxidation ponds." And also "All of the metrics used to assess macroinvertebrate community structure indicated significantly compromised water quality 100m downstream of the discharge from the Featherston Oxidation ponds relative to a control site 100m upstream of the oxidation pond discharge".
22	The periphyton survey included the specified components	!			Full compliance
23	Macroinvertebrate survey followed the specified protocols.	!			Full compliance
24	The results of the survey were reported in the previous compliance year			N/A	
25	A flow gauging option has been established with Greater Wellington and gauging results are sent through on a regular basis.	!			Full compliance
26	There shall be no discharges to air that are noxious, dangerous, offensive or objectionable resulting from the operation of WWTP beyond the site boundary.	!			There were no instances of odour complaints received during the reporting period. Full compliance
27	Signage	!			Full compliance
28	Signage	!			Full compliance
29	Access	!			Full compliance
30	Sampling and analytical methods	!			Full compliance
31	Reporting – Quarterly reports	!			Full compliance
32	Annual Report due 30 th June 2013	!			Full Compliance
33	Working party to be formed within 2 months of the commencement of this consent (12 January 2011).	!			Full Compliance
34	Within two months of the granting of this consent (12 January 2011) the consent holder shall commence an investigation for land treatment and disposal of wastewater. This investigation shall be undertaken in consultation with the Working Party.	!			Full Compliance

35	Consent holder shall meet with Working Party representatives at least on a 6 monthly basis and provide written progress to Wellington Regional Council in the annual monitoring report.		∇		Technical Non-Compliance
36	The consent holder shall produce a final report evaluative long-term wastewater treatment and disposal options including a detailed timeframe for implementation of the preferred option by 1 st June 2012.			NA	Not assessed within this compliance year.
37	Annual site visit to Featherston WWTP		∇		Technical Non-Compliance



File No: WAR970079
11/10/2013

South Wairarapa District Council
PO Box 6
Martinborough 5741

For: Jean-Paul Irwin

Dear Jean-Paul

Compliance monitoring report 2012/2013 for WAR970079 [30753, 20870]

Consent holder:	South Wairarapa District Council
Description:	Discharge treated sewage to Ruamahanga River and discharge associated contaminants to air
Location:	Martinborough Wastewater Treatment Plant, Weld Street, Martinborough
Consent type:	Discharge to water and air

I inspected your site and audited your reports for 2012/2013 compliance season. Your compliance assessment for 2012/2013 is below.

A detailed assessment of all conditions is attached.

Annual compliance rating

WAR970079 [30753] has a rating of **significant non-compliance** for 2012/2013.

WAR970079 [20870] has a rating of **full compliance** for 2012/2013.

You have received this rating because conditions 1, 2, 7 & 15 were not complied with. Compliance ratings are explained overleaf.

The Annual Report was sent through to our Environmental Science Department for comment and these have been inserted below:

Effluent quality

As stated in the annual report several variables are not meeting their compliance standards. I did note that the E. coli graph presented in the appendix is showing the 2011/12 year (not 2012/13) and either way it does not appear to match the raw data included in the appendix (ie, the graph doesn't match the raw data for the 2011/12 or 2012/13 year) so I'm not sure what data has been used to assess the compliance with the E. coli threshold and whether the explanatory text in the annual report is referring to the correct or incorrect data (ie, is the graph or the data right?)

Receiving water quality

The annual report provides some information from the “2012–2013 Summer Low-flow Assessment of Ecological Effects” report. It sounds like there would be significant value in GWRC seeing this report, has a copy of this been provided?

Of note, from the brief info provided states that there is an increase in periphyton along the true left bank for at least a couple of hundred metres below the discharge and that the discharge stays along true left bank in a concentrated plume for at least several hundred metres. And as stated in the annual report (or the excerpt from the low flow assessment report), the current water quality monitoring is therefore likely to be under estimating the worst of the water quality effects (I assume because the water quality monitoring is undertaken out in the middle of the river and has been missing the plume).

Overall

I think this annual report could be significantly improved by some simple tables that summarise the effluent and receiving water quality data. It is not particularly helpful to just provide the data in excel spreadsheet with some graphs (also in the excel spreadsheet).

Action required by consent holder

On this occasion we have decided not to take any further enforcement action because we believe that you are aware of the issues raised and are attempting to address and remedy the non-compliances and in this regard are in the process of preparing, for formal submission, your replacement consent application. However, we may not be so lenient should you be responsible for any further breaches of the Resource Management Act 1991 (RMA). Accordingly, you should take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your current consent.

Consent supervision and monitoring charge and next compliance assessment

You will receive an annual consent supervision and monitoring charge on a quarterly basis. Components of this charge are explained at the end of this letter.

Your consents will continue be inspected and assessed regularly throughout the year.

If you have any questions about the monitoring of your consent or your compliance assessment please contact Aimee Charmley on 06 8261556.

Yours sincerely

Aimee Charmley
Senior Resource Advisor, Environmental Regulation

Greater Wellington compliance rating system

Grade	Rating	Explanation and examples	Likely action required of consent holder
A	Full compliance	<ul style="list-style-type: none"> All administrative conditions assessed are met (e.g. supplying information and/or records) All effects based and best practice conditions assessed are met (e.g. complying with any maximum limits) 	<ul style="list-style-type: none"> None – 100% compliance with all consent conditions assessed
B	Technical non-compliance	<ul style="list-style-type: none"> Failure to supply information and/or keep adequate records Failure to adequately notify GW of works Minor works outside scope of consent issued but within scope of environmental effects considered when consent processed 	<ul style="list-style-type: none"> Action by the consent holder within specified timeframe
C	Environmental non-compliance	<ul style="list-style-type: none"> Breach of effects based or best practice consent condition with minor actual or potential environmental effects Breach of effects based or best practice consent condition with more than minor actual or potential environmental effects that can be fixed immediately Works outside scope of consent issued where environmental effects not considered 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff
D	Significant non-compliance	<ul style="list-style-type: none"> Persistent Grade C breach of same condition and failure to respond to requests for compliance Significant breach of effects based or best practice conditions that causes environmental effects (e.g. unauthorised discharge from site to water, significant disturbance to sensitive receiving environment or site on a scale not envisaged by consent, significant breach of water quality/quantity limit) Significant works outside scope of consent issued that causes environmental effects 	<ul style="list-style-type: none"> Requires immediate action and possible ongoing action by the consent holder Non-routine additional follow up inspection and/or audit by Environmental Regulation staff

Notes

- The actions and examples are a guide for compliance assessment. Depending on the consideration of any mitigating or aggravating factors, a more stringent or less stringent grading may be applied.
- If your consent falls within Grade B, C, or D, additional non-standard compliance charges apply which are based on actual and reasonable time spent by Greater Wellington staff.
- Please be aware that Greater Wellington has a responsibility to enforce the Resource Management Act 1991. Failure to comply with the Act can result in an infringement notice with a maximum fee of \$1,000 or prosecution with a maximum fine of \$600,000 for a company or \$300,000 or two years imprisonment for an individual. Accordingly, all necessary steps must be taken to ensure you comply with your obligations under the Act.

Consent supervision and monitoring charges

Each consent receives either an annual or one-off consent supervision and monitoring charge from Greater Wellington.

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*. This is only applied in cases where Greater Wellington monitors resource use in your area to ensure the sustainable management of that resource.

For further information on compliance charging, please see the Greater Wellington *Resource Management Charging Policy (2011)*.

Compliance monitoring report 2012/2013 – assessment of conditions

WAR970079 [30753] – Discharge to water

Condition		Condition met?			Comments
		Yes!	No √	NA	
1	The location, design, upgrading and operation of the works shall be in accordance with the resource consent application WAR970079 [2624] and its associated plans and documents lodged with the Wellington Regional Council on 26 September 2001, additional information lodged on 15 February 2002, the reconvened hearing on 31 May 2002 and variation of consent application WAR970079 [30753] lodged on 12 November 2010, unless otherwise specified by a consent condition.		√		Environmental non-compliance
2	The loading of the oxidation pond shall not exceed 100kg BOD/ha/day.		√		Technical Non-Compliance You have not demonstrated compliance with this condition.
3	The Consent Holder shall use its best endeavours to ensure that no high strength industrial waste is discharged to the sewerage system unless it has been pre-treated to a quality similar to that of domestic wastewater and the waste shall not cause any deterioration of the discharge quality from the oxidation pond.	!			Full compliance
4	The oxidation pond is to be maintained in an aerobic state at all times.	!			Full compliance
5	The Consent Holder shall ensure that the level of sludge in the oxidation pond does not exceed one third of the operational volume. Any sludge removed must be disposed of at an approved and consented facility.	!			Full compliance
6	The Consent Holder shall ensure that there is no deterioration of the quality of the discharge as compared with the average quality of the effluent for the period 1 January 1999 to 30 December 2001, as described in the Assessment of Environmental Effects report.	!			Full compliance

7	<p>The quality of the existing discharge from the pond into the Ruamahanga River shall comply with the tabulated quality parameters.</p> <p>Works to upgrade the treatment plant to comply with the above standards including the installation of an ultraviolet treatment plant shall be completed by 1 December 2011.</p> <p>Note 1: Summer is defined as November to April inclusive. Winter is defined as May to October inclusive.</p> <p>* Please note this figure is now based on an absolute standard as opposed to a rolling geomean.</p>	▽		<p>Environmental non-compliance</p> <p>Total nitrogen, ammonia and <i>E.coli</i> have been non-compliant.</p>
8 ^{2a}	<p>The consent holder will undertake the following in consultation with the Manager, Environmental Regulation, Wellington Regional Council and key stakeholders :</p> <p>By 1 December 2011 - Notify the Manager, Environmental Regulation, Wellington Regional Council that the work to install the Ultraviolet Treatment Plant has been completed. Circulate the Baker & Associates assessment of Pain Farm to the Manager, Environmental Regulation, Wellington Regional Council and key stakeholders; and a meeting with these parties to discuss outcomes of the Baker & Associates assessment and what progress and timetable is scheduled for development of Pain Farm for discharge to land (if that option is selected by the consent holder as a viable option)</p>		NA	<p>Not applicable for this compliance year</p>
8 ^{2b}	<p>By 10 January 2012 - Submission of a draft Assessment of Environmental Effects (AEE) to the Manager, Environmental Regulation, Wellington Regional Council and key stakeholders. The draft AEE shall cover all aspects identified in 5.4.2 of the Regional Freshwater Plan, and shall specifically include the following matters raised at the meetings on 23 February 2011 and 26 August 2011:</p> <ul style="list-style-type: none"> • A cultural values assessment, • Detailed assessment of the Pain Farm discharge to land site (if that option is selected as the preferred discharge site), • Preliminary assessment of a range of alternative discharge to land options in terms of their feasibility and costs, • Assessment of a range of options to upgrade the wastewater treatment plant in order to reduce the existing water quality standards (particularly BOD, SS, and ammonia) in terms of their feasibility and costs, • Analysis of receiving water quality and biological monitoring in the Ruamahanga River and the associated effects of the discharge to the river. <p>Note: The above specific matters are not an exhaustive list of requirements to lodge an application and Assessment of Environmental Effects under</p>		NA	<p>Not applicable for this compliance year</p>

	section 88 of the Resource Management Act 1991. Additional water quality and biological monitoring of the receiving environment may be required to ensure an appropriate level of analysis is provided.				
8 ^{2c}	By 28 February 2012 - A meeting with relevant representatives from the Wellington Regional Council and key stakeholders to discuss the commitments and proposals put forward in the application draft Assessment of Environmental Effects.			NA	Not applicable for this compliance year
8 ^{2d}	By 10 April 2012 - Submission of a full and complete application and Assessment of Environmental Effects to the Wellington Regional Council.			NA	Not applicable for this compliance year
9	Any residuals from any chemical treatment (for example aluminium residuals from the coagulation proposed for phosphate removal) shall not result in a discharge that exceeds appropriate guideline levels in the receiving waters.	!			Full compliance
10	The permit holder's interest in this consent may not be transferred to any owner or occupier of the site unless that owner or occupier has assumed the South Wairarapa District Council's responsibilities for the treatment and disposal of sewage.	!			Full compliance
11	<p>In the event of any failure of the Martinborough oxidation pond facility that would result in any deterioration in the quality of effluent discharging to the Ruamahanga River and be in breach of any condition of this permit, the permit holder shall:</p> <ul style="list-style-type: none"> • Take immediate steps to remedy and mitigate any adverse effects on the environment caused by any releases of such effluent. Such steps shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council; and • Immediately notify the Medical Officer of Health (C/- The Health Protection Officer, Choice Health) in accordance with the Public Health Service's Response Manual for Sewage Discharges; and • Notify the Manager, Planning and Resources, Wellington Regional Council within 24 hours after the malfunction of the oxidation pond facility has been detected; and • If required by the Manager, Planning and Resources, Wellington Regional Council, provide within 24 hours after notification a written report to the Manager detailing the manner and cause of that malfunction and the nature of the released effluent, and the steps taken (and being taken, if appropriate) to remedy and control that release and to prevent further such releases of untreated or partially treated effluent. 		!		Full compliance – incidents have been reported in the correct manner as per consent requirements
12	A management plan shall be submitted within six months of the commencement of this consent detailing how the sewage treatment and disposal system will be			NA	

	operated to ensure compliance with the consent conditions. The management plan is to be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council			
13	By 31 July 2002, in association with the Greytown sewage consent, the Consent Holder shall develop a risk communication strategy to notify potentially affected people of the existence and potential health effects of the discharge. The strategy shall involve the identification of key community groups (eg, recreational groups using the Ruamahanga River for water related activities) and the provision of risk information to those groups on a regular basis. The risk communication strategy will be developed in consultation with the public health service, Rangitane o Wairarapa and Ngati Kahungunu and shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council, and shall be adhered to by the consent holder.			NA
14	The permit holder shall place and maintain appropriate signs advising of the presence of treated wastewater from the Martinborough oxidation ponds. The signs shall be placed on the true left bank of the Ruamahanga River at or about the sewage outfall. The siting, wording and format of the signs shall be to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council. The sign shall be placed by 31 July 2002.			Full compliance
15	The discharge shall not cause any of the following effects in the Ruamahanga river after reasonable mixing: <ul style="list-style-type: none"> • the production of any conspicuous oil or grease films, scums or foams or floatable or suspended material; • any conspicuous change in the colour or visual clarity; • the rendering of freshwater unsuitable for consumption by farm animals; • any significant adverse effects on aquatic life; • a change of more than 3oCelcius in the natural temperature of the water. "Reasonable mixing" will be determined by the consent holder and agreed upon by the Manager, Planning and Resources, Wellington Regional Council, and will be defined by distance downstream of the outfall.		∇	Significant Non-Compliance
16	Review of conditions			NA
17	Cost recovery for review			NA
18	Change of conditions			NA
19	Charges			NA
20	The consent holder shall, in consultation with the Wellington Regional Council, submit a monitoring programme for the sewage treatment, discharge and receiving water. The monitoring programme is to be			

	confirmed to the satisfaction of the Manager, Planning and Resources, Wellington Regional Council and implemented within two months of the commencement of this consent.				
21	Consent term			NA	

Compliance monitoring report 2011/2012 – assessment of conditions

WAR970079 [20870] – Discharge to air

Condition		Condition met?			Comments
		Yes!	No √	NA	
1	There shall be no discharges to air resulting from the exercise of this consent that are noxious, dangerous, offensive or objectionable at or beyond the legal boundary of the property from which the permit holder operates. Such discharges include, but are not limited to odour, gases, vapours and aerosols.	!			Full compliance
2	Complaints record	!			Full compliance
3	At all times the sewage in the pond is to contain enough dissolved oxygen to prevent the generation of malodours.	!			Full compliance
4	The Consent Holder shall formally notify in writing the owners of Palliser Estate vineyard of the potential health risk of aerosols being discharged from the pond. That notification should include reference to the desirability of maintaining a vegetative screen established along the property boundary.	!			Full compliance
5	Transfer of permit			NA	
6	Review of consent			NA	
7	Cost recovery			NA	
8	Change of conditions			NA	