

1 December 2022

WAR120258

Greater Wellington Regional Council
PO Box 41
Masterton 5480

Attn: Aaron Johnston (Enforcement Officer with the designation of Resource Advisor,
Environmental Regulation)

Dear Aaron

South Wairarapa District Council acknowledges receipt of an Abatement Notice for the Martinborough Wastewater Treatment Plant (WWTP), issued on the 15th August 2022 by Greater Wellington Regional Council.

The Abatement Notice required SWDC to submit a corrective action plan by the 1st December 2022. This letter and attached Memo details our proposed corrective action plan, for a staged approach to address the compliance issues at the Martinborough WWTP.

The attached Memo from Wellington Water Limited (WWL) discusses several points of clarification regarding the identified exceedances. Of note, an investigation has identified two *E. coli* exceedances were from samples collected when the ultraviolet disinfection process was not operating (and therefore no discharge was occurring).

Since receiving the Abatement Notice, we have been working with our trusted advisor and operator, WWL, to understand what is required to comply with the notice, and to resolve the exceedances. We note that WWL had already prepared an Activity Brief for a programme of upgrades required for the Martinborough WWTP.

We don't believe that it is possible to comply in the timeframe provided (15th August 2023), because of the scale and complexity of the CAPEX upgrade programme required at the site. This work is not currently funded within this timeframe, and neither is it possible to deliver a significant upgrade within one year due to labour constraints and material supply issues. We are advised that three years is considered a minimum delivery timeframe for a project of this size, when adequate funding is available for each upgrade component required.

The attached Memo from WWL provides detail on the proposed staged upgrade plan, and how each part would address the exceedances raised by this Abatement Notice.

We have in-principle agreement to move forward with this staged plan that will move the plant towards improved compliance over a longer time period. We have planned CAPEX

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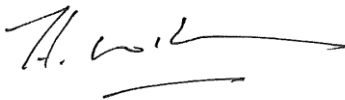
Our water, our future.

expenditure on the Martinborough WWTP of \$55K for the period 2022-2023, and \$205K for the period 2023-2024. The plan involves requesting additional CAPEX funding of \$7M to be spend on an outlet pump station and UV upgrade before June 2024, and OPEX of \$300K for pond desludging. This additional funding is to be confirmed through the annual plan process as it requires agreement from Councillors for new funding.

The remaining package of work will be undertaken after July 2024 when additional CAPEX funding may become available via Entity C (Water Reform), to the value of \$20M. Alternatively, SWDC will be requesting \$20M in our own LTP from 2024 onwards. SWDC's current long term plan outlines \$4.3M of CAPEX upgrades at the Martinborough WWTP for the period 2024-2027.

While the first stages of the proposed corrective action plan (to June 2024) have been carefully selected to deliver significant improvement in the plant's capability to reliably achieve consent conditions, we understand that the Martinborough WWTP may remain non-compliant until the full upgrade is completed. Therefore we request that GWRC reconsider the timeframe for compliance. Together with WWL, we propose a regular review of progress against the corrective action plan, with consideration of funding constraints.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H. Wilson', with a horizontal line underneath.

Harry Wilson
Chief Executive Office, South Wairarapa District Council