

File No: WAR080254 [26633, 33180, 33181, 33182]

26 January 2024

South Wairarapa District Council C/- Wellington Water Limited Private Bag 39804 Wellington Mail Centre 5045

For: Nick Hewer-Hewitt [Head of Network Performance WWL]

Dear Jeff,

Compliance monitoring assessment for WAR080254 [26633, 33180, 33181, 33182] for 2022/2023 period

Please find attached a compliance monitoring assessment for resource consent WAR080254 for resource consents associated with Greytown Wastewater Treatment Plant covering the period 01/07/2022 – 30/06/2023.

Of particular concern, the following conditions were rated non-compliant for the 2022-2023 reporting year:

- Schedule 1: Condition 15: Groundwater monitoring of Bore C was not completed as the access road was washed out.
- Schedule 1: Condition 23: The accuracy margin for the open pipe channel flow measuring device was greater than ±10% during this period.
- Schedule 2: Condition 1(a): Annual average daily flow equalled 805.79 m³/day, exceeding the daily limit of 750m³.
- Schedule 2: Condition 2(f): QMCI should not be reduced by more than 20% between upstream and downstream of the discharge. A decrease of 54% in QMCI scores was found between the upstream and downstream ecological monitoring sites.
- Schedule 2: Condition 12: The required samples from the Papawai Stream did not measure clarity.
- Schedule 4: Condition 11: Groundwater monitoring was not carried out in accordance with the Environmental Monitoring Plan.

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• Schedule 4: Condition 13: An existing nearby bore has been identified, but not included as a groundwater monitoring sample location as required in the Environmental Monitoring Plan.

If you have any questions about the monitoring of your consent or your compliance assessment, please contact me on 021 379 920.

Yours sincerely,

Aaron Johnston Compliance Monitoring & Enforcement Officer, Environmental Regulation



Compliance monitoring assessment

Consent No:	WAR080254	Date: 26 January 2024	Monitoring officer: Aaron Johnston				
Activity:	[26633]: Discharge the term of the con	ge Permit (water) to discharge contaminants to the Papawai Stream through onsent					
		ge Permit (land) to discharge treated effluent to land adjacent to the plan le Papawai Farm (Stage 2A and 2B)					
		rge permit (air) to discharge contaminants to air (odour from the por ss, and effluent associated with land application)					
	[33182]: Discharge permit (seepage) to discharge contaminants to land and water via from the ponds						

Your compliance rating

This compliance report covers the period from 01 July 2022 to 30 June 2023.

Individual consent compliance summary for the Greytown Wastewater Treatment Plant:

33181, 33182	FULL COMPLIANCE All conditions met – well done! No further action required
33180	LOW RISK NON-COMPLIANCE
	Most conditions met. Some action may be required
26633	SIGNIFICANT NON-COMPLIANCE
	Many condition(s) not met. Immediate action required

Overall compliance summary for the Greytown 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.

Comments

An assessment of each condition is included below for your reference:



Compliance monitoring report 2021/2022 – assessment of conditions

Sur	nmary of Conditions	Con	dition r	net?	Comments
Sch	Schedule 1: General conditions		No X	N/A	
1	 Except as otherwise required by any other condition of these consents, the activity authorised by this Wastewater Discharge Permit shall be carried out generally in accordance with following information provided by the applicant: Greytown Waste Water Treatment Plant Proposed operation, upgrade and maintenance to 2049; Application for Resource Consents, Activity Description and Assessment of Environmental Effects; Mott MacDonald, Geange Consulting; 9 September 2015, including Appendices 1 to 17; Greytown WWTP Consent Application – Additional Information requested by the Panel (undated and no page numbers) but received 18 December 2015. Where there are inconsistencies between the application and the further information provided by the applicant, the most recent information applies. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the permit, the conditions apply Advice Note 1: Any change from the location, design concepts and parameters, implementation and/or operation may require a change of consent conditions pursuant to Section 127 of the Resource Management Act 1991, or, if the changes exceed the scope of a change of conditions, a new consent under section 13 of the Act. 				
2	The Consent Holder shall engage in writing with the Manager, Environmental Regulation, Wellington Regional Council, if any contingency works or variation from the consents is required prior to undertaking any activity. This is to ascertain whether the contingency work is within the scope of these consents, or whether a variation to the consents or additional resource consent will be required.			N/A	
3	The treatment system shall be upgraded in stages as follows: Stage 1A – commencement of consent Stage 1B – 1 January 2021 Stage 2A – 1 November 2030 Stage 2B – 1 January 2039	~			Stage 1B is fully operational, with a total of 25,600m ³ discharged to land during the compliance year.



:	The Consent Holder shall prepare, within the timeframes stated, the management and monitoring plans/manuals listed in Table 2 below. The plans:		X	Based on GWRC records, three of the nine plans have been certified since 2017. GWRC is working with WWL to get the remaining plans completed and approved.
	a) shall give effect to the relevant requirements outlined			The management plans have the following status:
	in the conditions in Schedules 1, 2, 3, and 4; and			Operation & Maintenance Plan:
	b) may be prepared as separate plans; or			GWRC certified SWDC version in July 2017
	c) where approved in writing by the Manager, Environmental Regulation, Wellington Regional			• WWL submitted draft plan in July 2022.
	Council, one or more plans may be combined as a single plan; and			GWRC returned draft to WWL with request for changes September 2022. Certification
	 Each plan shall detail which consent conditions the plan is giving effect to 			withheld until requested changes are made.
				Odour Management Plan:
				GWRC certified SWDC version in July 2017.
				 Updated and re-submitted to GWRC in June 2021, reviewed by PDP on behalf of GWRC, comments provided to WWL.
				 WWL updating plan with PDP comments and will resubmit for certification.
				Tangata Whenua Values Monitoring Plan
				 WWL have conducted site visits with iwi and requested proposals for iwi to write two TWVMPs for iwi.
				Inflow and Infiltration Reduction Plan
				• Plan certified September 2022.
				Discharge to Land and Water Management plan
				 Plans combined in a Discharge to Land and Water Plan.
				 Most recent draft was submitted to GWRC in March 2017 but was not approved.
				 WWL currently preparing draft update for certification.
				Environmental Monitoring Plan
				• Plan certified September 2022.
				Site Flooding Management Plan
				 Most recent draft was submitted to GWRC in March 2017 but was not approved.
				• WWL preparing draft plan for certification.
				Riparian Management Plan
				• Plan certified May 2022.
-	Prior to the formal submission of the final document required under Condition 4, each manual and plan listed in Schedule 1: Condition 4 Table 2 shall be reviewed by	~		Not all plans have been certified and approved – the plans that have been submitted were reviewed by independent consultants.



	a suitably qualified independent person. Any comments and inputs received from the independent reviewer shall be clearly documented and attached to the plan, along with clear explanation of where any comments have not been incorporated and the reasons why.			
6	Following each independent review under Schedule 1: Condition 5, the Consent Holder shall submit a draft copy of each of the manuals and plans listed in Schedule 1: Condition 4 Table 2 to the Wellington Regional Council at least 20 working days before it is submitted to the Manager, for technical certification in compliance with Schedule 1: Condition 7. Any comments received from the Council, along with a clear explanation of where any comments have not been incorporated and the reasons why, shall be supplied to the Manager, at the same time that the relevant plan is submitted under Schedule 1: Condition 7.			Not all plans have been certified and approved – the plans that have been submitted allowed over 20 days for review.
7	The manuals and plans listed in Schedule 1: Condition 4 Table 2 shall be submitted within their respective timeframes to the Manager, Environmental Regulation, Wellington Regional Council for their written technical certification.		X	Not all plans have been certified and approved in the required timeframes.
	a) Should certification of any manual or plan be withheld, the Consent Holder shall submit a revised manual or plan to the Manager, for technical certification as soon as is practicable. Should certification of the revised manual or plan be again withheld then the Consent Holder shall engage a suitably qualified mutually acceptable independent person for resolution of the matters of dispute and his or her decision on those matters shall be final. The costs of dispute resolution shall be met by the Consent Holder;			
	b) Activities which are subject to a plan shall not commence until the plan has received technical certification. This does not apply to the Greytown WWTP Operations and Maintenance Manual;			
	c) A manual or plan may be varied by the Consent Holder. The certification process for a variation of a manual plan shall follow the process outlined above; and			
	d) The Consent Holder shall exercise this consent in accordance with, and comply with, the provisions of any certified manual or plan (including any certified variation) at all times.			
8	The objectives of the manuals and plans are set out in Table 3.	~		Not all plans have been certified and approved – the plans that have been submitted meet the objectives in Table 3.



9	The Schedule 1: Condition 8 Table 3 plans and manuals			Not all plans have been certified and approved - the
Ĵ	shall:			plans that have been submitted meet the objectives
	a) Be developed to achieve the following over-riding objectives.			and minimum contents in Table 3 and Table 4.
	(i) From Stage 1B onwards minimise treated wastewater discharges to the Papawai Stream so far as is reasonably practicable within the constraints of land availability on the Stage 1B site and storage within the existing ponds at their existing bund level; and			
	(ii) From Stage 2A onwards minimise treated wastewater discharges to the Papawai Stream, so far as is reasonably practicable within the constraints of land availability on the Stage 1B and 2A sites and storage within the existing ponds at their existing bund level.			
	(iii) Avoid where possible, and otherwise minimise, wastewater discharges to the Papawai Stream at times of low stream flow and particularly when the flow in the Papawai Stream at Fabians Road is less than 190 L/s.			
	b) As a minimum include, but not be limited to, the information listed in Schedule 1: Condition 9 Table 4.			
10	All the plans and manuals listed in Schedule 1: Condition 4 Table 2 shall be prepared by a suitably qualified and experienced person or persons with expertise in the matters that the individual documents address.	~		Not all plans have been certified and approved – the plans that have been submitted were drafted and reviewed by suitably qualified and experienced SWDC and WWL staff.
11	All the plans and manuals listed in Schedule 1: Condition 4 Table 2 shall be reviewed and where necessary updated either:	~		Not all plans have been certified and approved – WWL is undertaking a project to review these plans and ensure that they are up to date as discussed in
	a) annually within one month of the anniversary of the commencement date of these consents; or			condition 4.
	b) Within three months of implementing a new stage as defined in Schedule 1: Condition 3, Table 1; or			
	c) Where environmental monitoring supports a change. Any change shall be subject to the written technical certification of the Manager, Environmental Regulation, Wellington Regional Council.			
12	Where there are any contradictions or inconsistencies between the plans and manuals listed in Schedule 1: Condition 4 Table 2 and conditions of these consents, then the conditions apply		N/A	
13	The following (or similar wording with the same intent and outcome) shall be included within the Land Discharge		N/A	To be assessed during the approval process for the Land Discharge Management Plan.



	Management Plan to be prepared in accordance with Schedule 1: Conditions 4, 8 and 9:				
14	The following (or similar wording with the same intent and outcome) shall be included with the Land Discharge Management Plan to be prepared in accordance with Schedule 1: Conditions 4, 8 and 9:			N/A	To be assessed during the approval process for the Land Discharge Management Plan.
15	 The Consent Holder shall monitor and record wastewater discharge and influent flow and quality according to the frequency, and constituents specified in Schedule 6: Table 1, at: a) the locations specified in Schedule 6: Table 2 and Figure 1 (until such time as the Environmental Monitoring Plan is certified pursuant to Schedule 1: Condition 7); or b) the monitoring locations specified in the Environmental Monitoring Plan (following its certification pursuant to Schedule 1: Condition 7). 		X		 Monitoring occurred as specified in Schedule 6 Table 1 & 2 and the recently certified EMP, with some exceptions: No black disc clarity monitoring. WWL has replaced black disc clarity monitoring with turbidity, but it was not completed in July, August, September, or October 2021 [non-compliant] Particulate organic matter was replaced with volatile suspended solids (VSS). This was previous agreed with GWRC [compliant] 191 daily observation logs were supplied, however the Schedule 6: Table 1 specifies that inspections should be undertaken daily [non-compliant] All monitoring data was supplied with the annual report. Influent flows were monitored at above the specified in EMP). These results are discussed further in Schedule 2: Condition 2.
16	To enable the sampling of the treated wastewater, easy and safe access to a sampling port(s) shall be provided by the Consent Holder and maintained as close as is practicable to those sampling locations specified in Schedule 1: Condition 20.				The treated wastewater sampling point is accessible.
17	The Consent Holder shall keep inspection records and operational logs which record regular inspections, identify changes in the operating procedures and record unusual events that occur at the plant. Copies of these records shall be supplied to the Manager, Environmental Regulation, Wellington Regional Council, within 20 working days of a written request by the Manager.				Yes, records available in Infrastructure Data and the appendix.
18	 In respect of monitoring required by these consents, the following shall apply: a) all monitoring techniques employed in respect of the conditions of these consents shall be carried out by suitably experienced and qualified persons; 	~			Monitoring is completed by suitably qualified and experienced operators and testing is completed by Eurofins (IANZ accredited lab).



	 b) all analytical testing undertaken in connection with these consents shall be performed by a laboratory that is IANZ accredited for the analytical tests; c) all soil and water sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Waste Water, 2012" 22nd edition by A.P.H.A. and A.W.W.A. and W.E.F., or any other method approved in advance in writing by the Manager, Environmental Regulation, Wellington Regional Council; and d) if any monitoring sites are identified as unsuitable, alternative monitoring sites shall be identified and developed after consultation with the Manager, Environmental Regulation. 			
19	Where a certified plan or manual contains a monitoring, measurement, or recording methodology which differs from those specific methodologies contained within any condition of these consents, the management plan or manual methodology shall prevail.	2		No changes have been implemented.
20	 The Consent Holder shall fit measuring equipment to monitor the wastewater flows at the following points and within the timeframes specified: a) Inlet inflow – within six months b) Discharge outflow – within three months c) Land treatment volume – prior to any discharge to land 	7		 Inlet flow meter installed 28/09/2016 Flowmeter on outlet to ultraviolet disinfection was installed with installation of ultraviolet disinfection (2018) Land treatment volume flow meter was installed prior to the discharge to land commencing (May 2019) River discharge flow meter was replaced (May 2019)
21	Flow volume measuring equipment (including inflow volume; outflow volume (as measured at or beyond the UV plant or beyond) and land discharge volume) shall be maintained in accordance with the Greytown WWTP Operations and Maintenance Manual (which shall include reference to manufacturer's specifications) for the duration of these consents.	2		Compliant.
22	Within three months of the commencement of these consents, the Consent Holder shall install a datalogger and flow measuring device at the wastewater discharge flow measurement point that is compatible with the Wellington Regional Council's Water Data Management System.	2		Flow meter data is sent to GWRC data management system.
23	Where the flow measuring device measures flow in a pipe, measurement error is to be no more than $+/-5\%$, and where installed at a weir or open channel, measurement error is to be no more than $+/-10\%$ as an average across the flow range. The measuring equipment must:		X	The discharge flowrate can be verified as there is a UV magnetic flowmeter, which can be compared to the measured land and river discharges. For the year the UV flow compared to outflows were well aligned with a 3% differential (8000 m ³ over the year).



	 a) be able to measure cumulative discharge; b) be able to measure instantaneous flow rate; c) be installed in accordance with the manufacturer's specifications; and d) be calibrated annually 		The inflow meter recorded a significant volume in exceedance of what was discharged (+32%). This meter was moved, calibrated, and refurbished in Jan 2022. Currently there is a plan to replace the open pipe channel flowmeter with a new type in the 2023/24 financial year to achieve improved confidence in the accuracy.
24	The Consent Holder shall verify the accuracy of the flow measuring device required under Schedule 1: Conditions 22 and 23 within six (6) months of the commencement of these consents and a minimum of every five years thereafter, and as directed by the Manager, Environmental Regulation, Wellington Regional Council for the duration of this consent to determine if the actual volume of discharge is within +/- 5% as an average across the flow range for a pipe or +/- 10% as an average across the flow range for a weir or open channel.	1	Flowmeters were verified in 2021.
25	The Consent Holder shall provide a Quarterly Data and Exception Report for each three-month period ending 31 March, 30 June, 30 September and 31 December to the Manager, Environmental Regulation, Wellington Regional Council, within 30 working days of the end of each three- month period. The quarterly report shall be provided in electronic format. The quarterly report shall include, but not be limited to, the following:	~	All have been submitted.
	 a) The results of all monitoring undertaken in accordance with the conditions of these consents, with all monitoring data provided in a suitable electronic format; 		
	 A brief commentary on any exceptions identified from the data and reasons for difficulties in achieving compliance with the conditions of this consent; and 		
	c) Subject to Schedule 1: Condition 35 a schedule summarising any complaints received during the quarter.		
	Where agreed in writing with the Manager, up to two quarterly reports may be combined into a single report for any such specified reporting period(s).		
26	The Consent Holder shall provide to the Manager, Environmental Regulation, Wellington Regional Council, an Annual Report by 30 September each year, summarising compliance with the conditions of these consents for the previous compliance year (1 July to 30 June inclusive).	~	All requirements have been included in the annual report.
27	Within three (3) months of the commencement of these consents, the Consent Holder shall commence the process to establish a Community Liaison Group (CLG) in accordance with the Terms of Reference included as Schedule 7 to these consents.	7	CLG group was created as required.



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28	The Terms of Reference shall be incorporated into the Greytown WWTP Operations and Maintenance Manual; and amendments to the Terms of Reference may be undertaken in accordance with the Terms of Reference and/or the approved Greytown WWTP Operations and Maintenance Manual without the need to vary the conditions of these consents.	~		Terms of Reference were appended to the 2016 operation and maintenance plan. The Terms of Reference will be included in revisions to the O&M Manual.
29	Within one month of commencement of this consent a Greytown WWTP liaison person shall be appointed by the Consent Holder to be the main and readily accessible point of contact. The Consent Holder shall take appropriate steps to seek to advise all stakeholders and interested persons of the stakeholder liaison person's name and contact details. If the liaison person will not be available for any reason, an alternative person shall be nominated by the Consent Holder.	V		Nick Hewer-Hewitt (Head of Network Performance) is the current WWL liaison person.
30	 For the duration of these consents, the Consent Holder shall: a) maintain signage on the true left and true right stream banks of the Papawai Stream in the immediate vicinity of the treated wastewater outfall and at or about the confluence of the Papawai Stream and Ruamahanga River, which shall at all times: (i) provide clear identification of the location and nature of the discharge; (ii) indicate the general frequency and duration of the discharges; (iii) provide a 24-hour contact phone number; and (iv) be visible to the public visiting publically accessible parts of the area and legible from a distance of 20 metres without unnecessarily detracting from the visual amenity of the area. b) maintain appropriate signage on the boundaries of the WWTP site, Site A and Site B, which shall be legible to a person during daylight hours, warning that partially treated wastewater is discharged to land and may be present at the site. 			Signage was installed and is compliant.
31	The Consent Holder shall consult with Regional Public Health and provide a copy of their written approval regarding the wording of the signs prior to submitting them for approval to Wellington Regional Council. Written confirmation of the signage placement accompanied by photographs of the signage shall also be provided to the Manager, Environmental Regulation, Wellington Regional Council, within one month of the erection of the signs.			Regional Health confirmed signage was acceptable, submitted in 2016.
32	The access gate to the Greytown WWTP site shall remain locked at all times that operational staff of the Consent	~		The access gate is padlocked at all times unless an operator is present within the site. This is recorded in the daily operator checks.



	Holder (which shall include authorised contractors) are not present on site, to prevent unauthorised access.			
33	Stock access to the Greytown WWTP oxidation ponds and discharge channel shall be restricted, except that grazing of the embankment not adjacent to either Tilsons Creek or the Papawai Stream by stock shall be permitted under the management of the Consent Holder. All fences or other barriers shall be maintained by the Consent Holder to be of suitable stock proof standard at all times.	2		The site is fenced with a standard agricultural post and wire type fence. Fence repairs occurred in 2018 and 2019 after ultraviolet disinfection installation.
34	The Consent Holder shall arrange and conduct a consent information meeting within two months of the date of commencement of these consents. The purpose of the meeting shall be to confirm the conditions of the consents and the responsibilities of the contractor. The Consent Holder shall invite, with a minimum of 10 working days notice, the Wellington Regional Council and a representative from each key contractor operating the activity.		N/A	
35	The Consent Holder shall keep a record of any complaints that are received with respect to the operation of the Greytown WWTP including any associated discharge to land area. The record shall contain the following details:	4		No complaints were made during this period.
	a) name and address of the complainant (unless withheld by the complainant);			
	b) identification of the nature of the complaint;			
	c) date and time of the complaint and of the alleged event;			
	d) weather conditions at the time of the complaint; and			
	e) any measures taken to address the cause of the complaint.			
36	The Consent Holder shall notify the Manager, Environmental Regulation, Wellington Regional Council of all complaints relating to the exercise of these consents which result from a non-compliance with the conditions of these consents, within 24 hours of being received by the Consent Holder, or the next working day. A schedule of all complaints shall be provided with the quarterly report required by Schedule 1: Condition 25.		N/A	No complaints were made during this period
37	The Consent Holder shall forward to the Manager, Environmental Regulation, Wellington Regional Council, a copy of any complaints recorded in the annual report required by Schedule 1: Condition 26.		N/A	No complaints were made during this period
38	The WWTP system shall be maintained in an efficient operating condition at all times. In the event of any treatment failure that is likely to result in deterioration in the quality of the discharge which would affect the	2		No significant treatment failures occurred during this period. The plant was maintained in efficient operating condition.



		eiving environment, and be in breach of any condition hese consents, the Consent Holder shall:			
	a)	Take immediate steps to remedy and mitigate any adverse effects on the environment caused by the failure;			
	b)	Notify the Manager, Environmental Regulation, Wellington Regional Council, within 24 hours after the malfunction has been detected, detailing the manner and cause of that malfunction and the steps taken to mitigate its effects and to prevent recurrence. Notification can be sent to the Wellington Regional Council at notifications@gw.govt.nz and shall include the consent reference and the name and phone number of a contact person;			
	c)	Notify the members of the Community Liaison Group within 48 hours of the malfunction has been detected;			
	d)	Forward an incident report to the Manager, Environmental Regulation, Wellington Regional Council, within seven (7) working days of the incident occurring, unless otherwise agreed with the Manager, Environmental Regulation, Wellington Regional Council. The report shall describe the manner and cause of the incident, measures taken to mitigate/control the incident (and/or illegal discharge), and measures to prevent recurrence; and			
	e)	Notify Regional Public Health within 24 hours of the malfunction has been detected.			
39		tification in accordance with Schedule 1: Condition 38 and (d)		N/A	Not required.
40- 48		nditions 40–48 relate to review of conditions and arges.		N/A	41 & 42: This report is to be written by January 2024.

	Summary of Conditions		dition r	net?	Comments
	Schedule 2: Discharge to Water	Yes ✓	No X	N/A	
11	 Subject to the additional restrictions during each Stage imposed by Schedule 2: Condition 4, these consents authorise the discharge of treated wastewater at: a) An annual average daily flow of up to 750m³/day; and b) An annual 95 percentile daily flow of up to 1,500m³/day. 		X		 Between the 01/07/2022 and 30/06/2023, compliance with the Schedule 2: Consent Condition 1, was as follows: a) Annual average daily flow equalled 805.79 m³/day (non-compliant) b) Annual 95th percentile daily flow equalled 1,031 m³/day (compliant)

¹ Compliance assessed by Traverse Environmental Ltd



22	 The following monitoring parameters shall be used to assist with assessing the effects of the wastewater discharge to the Papawai Stream during Stages 1B, 2A and 2B: a) The discharge should not cause the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials; b) The discharge should not cause bacterial and / or fungal slime growths visible to the naked eye as plumose growths or mats; c) The annual concentration of total ammoniacal nitrogen should not exceed 0.24 mg/l; d) The concentration of total ammoniacal nitrogen should not be reduced by more than 30% between upstream and downstream of the discharge; and f) The QMCI should not be reduced by more than 20% between upstream and downstream of the discharge. The monitoring parameters shall apply at the GWRC monitoring site located 50m downstream of the Greytown WTTP discharge, as shown on Schedule 6: Figure 1. 		X		 Between the 01/07/2022 and 30/06/2023, compliance with the Schedule 2: Consent Condition 2, was as follows: a) The annual reports states that there were no records of conspicuous oil or grease films, scums or foams, or floatable or suspended materials (compliant). b) The annual reports states that there were no records of bacterial and / or fungal slime growths (compliant). b) The annual reports states that there were no records of bacterial and / or fungal slime growths (compliant). Note: There are records for a visual assessments of scum in the data provided for monitoring sites upstream, 200m downstream and 540m downstream. We recommend aligning with the requirement that the visual assessment should be carried out 50m downstream. c) Median concentrations of total ammoniacal nitrogen did not exceed 0.24 mg/L (compliant) d) 95th percentile concentrations of total ammoniacal nitrogen did not exceed 0.4 mg/L (compliant). e) Turbidity results are presented instead of visual clarity (not-assessed). f) A decrease of 54% in QMCI scores was found
33	If monitoring undertaken under the conditions of these consents demonstrates any of the Schedule 2: Condition 2 monitoring parameters are exceeded then the Consent Holder shall undertake an investigation into the effects of the discharge from the Greytown WWTP, taking into account the likely effects of upstream contamination. The findings shall be reported in the annual report required by Schedule 1: Condition 26.	7			between the upstream and downstream sites (non-compliant). A report assessing the contribution the Greytown WWTP discharge to adverse effects in the Papawai Stream was carried out by Environmental Impact Assessments Ltd in August 2023 is appended to the annual report (compliant).
4	Following confirmation of commencement of Stage 2B Land Treatment in accordance with Schedule 1: Condition 3, there shall be no discharge of treated effluent to the Papawai Stream when the flow in the Papawai Stream is less than three times the median flow.			N/A	
54	 Any treated wastewater discharged to the Papawai Stream shall meet the following wastewater discharge standards: a) The concentration of BOD5 shall not exceed 60 g/m³ in more than 3 out of any 12 consecutive monthly test results; 	2			 The clauses of Schedule 2: Condition 5 were complied with, for this reporting period, as follows: a) BOD5 concentrations did not exceeded 60 g/m³ on any of the 12 monitoring occasions (compliant) b) TSS concentrations exceeded 80 g/m³ on 1 out of 12 monitoring occasions (28/02/2023) (compliant)

 ² Compliance assessed by Traverse Environmental Ltd
 ³ Compliance assessed by Traverse Environmental Ltd
 ⁴ Compliance assessed by Traverse Environmental Ltd



	 b) The concentration of TSS shall not exceed 80 g/m³ in more than 3 out of any 12 consecutive monthly test results; c) The concentration of Total Ammonia-nitrogen (NH4-N) shall not exceed 20 g/m³ in more than three out of any 12 consecutive monthly test results; and d) The concentration of TN shall not exceed 30 g/m³ in more than three out of any 12 consecutive monthly test results; e) The concentration of DRP shall not exceed 6 g/m³ in more than three out of any 12 consecutive monthly test results. 		 c) Total ammoniacal nitrogen concentrations exceeded 20 g/m³ on 1 out of 12 monitoring occasions (23/12/2022) (compliant) d) Total nitrogen concentrations did not exceed 30 g/m³ on any of the 12 monitoring occasions (compliant) e) DRP concentrations did not exceed 6 g/m³ on any of the 12 monitoring occasions (compliant).
65	Should the concentrations in any sample of the treated wastewater discharged to the Papawai Stream exceed the following triggers, the Consent Holder shall undertake an investigation as to the likely causes of the exceedances. The outcomes of the investigation shall be incorporated in the Annual Report required under Schedule 1: Condition 26.	5	Not required as concentrations did not exceed the triggers during this reporting period. (compliant)
7	The Consent Holder shall install and commission a UV disinfection plant to the wastewater treatment system before 1 September 2018.	7	A temporary UV system was commissioned on 30 August 2018. The UV was relocated to the irrigation/UV building in April 2019.
8	 Further to Schedule 2: Condition 5, upon commissioning of the UV disinfection plant, the following standards shall apply: a) For discharges up to 1,500m³/day, 5 of 10 consecutive E coli values shall not exceed 100 cfu per 100 millilitres, and no more than two out of 10 consecutive values shall exceed 1,400 cfu per 100 millilitres; or b) For discharges over 1,500m³/day, UV treatment shall be applied to a minimum of 1,500m³/day and the remaining flow is not required to have UV treatment. 	۲ ۲	All flow has gone through the UV system. No instances of E. coli exceeding 100 cfu/100ml. Note: The laboratory changed the detection limit to 100 CFU in January 2023. This means that the concentration could have been lower than 100cfu/100ml, but all results are reported at 100cfu/100ml because of laboratory detection limit.
9	All wastewater discharges to the Papawai Stream under Greytown WWTP normal operating conditions shall be made via the existing surface discharge structure at the location identified in Schedule 6: Figure 1 (or alternative approved in writing by the Manager, Environmental Regulation, Wellington Regional Council).	<u>ک</u>	All discharges made from existing structure.
10	The Consent Holder shall confirm in writing to the Manager, Environmental Regulation, Wellington Regional Council, the commencement date of any land discharge in Stages 1B, 2A and 2B, including any transitional operational requirements to give effect to land discharge. This confirmation shall be provided no less than 20	~	First discharge to land on 4 June 2019 (according to flow meters. Notification was sent.

⁵ Compliance assessed by Traverse Environmental Ltd



	working days prior to any discharge occurring on the respective land treatment site.			
11	A copy of the confirmation required by Schedule 2: Condition 10 shall also be provided to the members of the Community Liaison Group no less than five working days after the Manager, Environmental Regulation, Wellington Regional Council, has been advised.	v		Notification was sent.
126	 Subject to Schedule 1: Conditions 15 to 19, the Consent Holder shall collect representative grab samples from the Papawai Stream according to the frequency, and constituents and locations specified in Schedule 6: Table 1, at: a) The monitoring locations specified in Schedule 6: Table 2 and Figure 1 (until such time as the Environmental Monitoring Plan is certified pursuant to Schedule 1: Condition 7); b) The monitoring locations specified in the Environmental Monitoring Plan (following its certification approval pursuant to Schedule 1: Condition 7); and c) All sites shall be sampled on the same day. As far as practicable, the surface water sampling day shall 		X	All parameters except for clarity were measured at the correct frequencies, and locations between 01/07/2022 and 30/06/2023, as per Schedule 6: Table 1, and the Environmental Monitoring Management Plan. Clarity was not measured during the entire monitoring period. (non-compliant)
	practicable, the surface water sampling day shall coincide with the wastewater effluent sampling day.			
137	 Until the commencement of Stage 2B land discharge, the Consent Holder shall have an appropriately qualified and experienced ecologist undertake a quantitative ecological survey of the Papawai Stream every two years in the period between January 31 and April 30 inclusive at surface water locations to be specified in the Environmental Monitoring Plan certified pursuant to Schedule 1: Condition 7. These surveys should be conducted after at least a two-week period without a significant flood event (defined as an instantaneous river flow exceeding three times the estimated median flow in the Papawai Stream) and following at least a two-day discharge to water regime under normal operating conditions during the week preceding the survey for the purpose of determining the effect of the discharge on the aquatic ecosystem of the stream. The survey shall comprise as a minimum: a) An inspection of the streambed above and below the point of discharge for the presence of any nuisance macrophyte growths; b) Sampling of macroinvertebrate communities in the Papawai Stream at points located approximately 50-100m upstream and 150-200m downstream. 			Monitoring conducted under Schedule 2: Condition 13 and the EMMP during this reporting period was as follows: <u>Frequency and timing</u> : The ecological survey was undertaken on 14/04/2023, after 46 days without floods and after at least two days with discharge during the preceding week (compliant). <u>Practitioner</u> : The ecological survey was carried out by Environmental Impact Assessments Ltd (compliant). <u>Macrophytes</u> : An assessment of macrophyte cover was undertaken, as per Condition 13(a) (compliant). <u>Macroinvertebrates</u> : Sampling of macroinvertebrates was undertaken as per condition 14 (compliant). <u>Location</u> : The sites sampled align with the requirements of Condition 13b. (compliant)

 $^{^{\}rm 6}$ Compliance assessed by Traverse Environmental Ltd $^{\rm 7}$ Compliance assessed by Traverse Environmental Ltd



14 ⁸	 The macroinvertebrate sampling required by Condition 13(b) shall follow Protocols C4 (Soft-bottomed quantitative), from the Ministry for the Environment's "protocols for sampling macroinvertebrates in wadeable streams" (Stark et al. 2001). This shall involve: a) collection of five replicate sweep net samples at random within a 20m section of run habitat at each sampling site; b) full count of the macroinvertebrate taxa within each replicate sample to the taxonomic resolution level specified for use of the Macroinvertebrate Community Index (MCI); and c) enumeration of the results as taxa richness, MCI, QMCI, %EPT taxa and %EPT individuals. 		 Macroinvertebrate monitoring conducted under Schedule 2: Condition 14 for this reporting period was as follows: Macroinvertebrates were sampled following Protocol C4 (compliant) Five replicate sweep-net samples were collected from run habitat at each site (compliant) Macroinvertebrates were fully counted and identified to the taxonomic resolution level specified for use of the Macroinvertebrate Community Index (compliant) Taxa richness, MCI, QMCI, % EPT taxa and % EPT individuals were calculated and reported on (compliant).
15	The findings and results of monitoring undertaken under Schedule 2: Conditions 12 to 14 (including assessment against the parameters in Schedule 2: Condition 2) shall be incorporated and submitted in annual reports, as required by Schedule 1: Condition 26.		The findings and results of monitoring undertaken during the period are included in the annual report.
16	The Consent Holder shall undertake an assessment of the appropriateness of historic water quality and ecological monitoring sites in terms of providing meaningful and robust monitoring data to achieve the intent of these conditions. Any recommendations for additional, reduced, or relocated monitoring locations shall form part of the draft Environmental Monitoring Plan submitted to the Manager, Environmental Regulation, Wellington Regional Council, in accordance with Schedule 1: Condition 6.		This assessment is included in the Environmental Monitoring Plan.

	Summary of Conditions	Con	Condition met?		Comments
	Schedule 3: Discharge to Air	Yes ✓	No X	N/A	
1	There shall be no discharges of odour to air that are noxious, dangerous, offensive or objectionable resulting from the operation of the Greytown WWTP, at or beyond the boundary of the WWTP site as designated in the Wairarapa Combined District Plan.				No odour complaints were made during this period. Odour issues in from ponds noted, and remedied by operator who follows certified OMP.
2	There shall be no discharges of odour to air that are noxious, dangerous, offensive or objectionable resulting from the discharge of wastewater from either the Stage 1B (Site A) or Stage 2A and 2B (Site B) Land Treatment sites, at or beyond the boundary of the respective wastewater discharge area.				No odour complaints were made during this period.

⁸ Compliance assessed by Traverse Environmental Ltd



3	There shall be no spray drift that is noxious, dangerous, offensive or objectionable resulting from the discharge of wastewater from either the Stage 1B (Site A) or Stage 2A and 2B (Site B) Land Treatment sites, at or beyond the boundary of the respective wastewater discharge area.		Irrigation only runs if weather conditions (notably wind levels) permit. No odour complaints were made during this period.
4	The management of odour from the Greytown WWTP shall be undertaken in accordance with the certified Odour Management Plan (Schedule 1: Condition 4, Table 2).		Compliant.

	Summary of Conditions		Condition met?		Comments
	Schedule 4: Discharge to Land	Yes ✓	No X	N/A	
1	The discharge of treated wastewater to land shall only be undertaken when there is a soil moisture deficit that is greater than the depth of discharged wastewater.	~			All discharges occurred with a soil moisture deficit greater than the depth of discharged water.
2	 Any treated wastewater discharged shall meet the following standards: a) The concentration of BOD₅ shall not exceed 60 g/m³ in more than three out of any 12 consecutive monthly test results; b) The concentration of TSS shall not exceed 80 g/m³ in more than three out of any 12 consecutive monthly test results; c) E coli values shall not exceed 100 cfu per 100 millilitres in more than five of 10 consecutive monthly test results; d) The nitrogen loading rate, as a consequence of: (i) The exercise of this permit; and/or (ii) The application of nitrogen based fertiliser; and/or (iii) The disposal of any other waste; and/or (iv) inputs from any stock grazing on the disposal areas; shall not exceed the average monthly nutrient requirements of the specific land use at the time of discharge. 				 The data attached to the appendices of the report showed that: a) The concentration of BOD₅ did not exceed 60g/m³ during this period. b) The concentration of TSS exceeded 80g/m3 on one occasion (28/02/2023). c) The concentration of E. coli did not exceed 100 cfu/100ml during this period. d) The net nitrogen loading rate was 15.6 KgN/ha/yr. e) The annual report indicates that the maximum monthly net loading rate for the irrigation area was 5.2 kgN/ha in December 2022.
	 e) The total nitrogen loading rate across the site for any month shall not exceed the nitrogen uptake by the crop for that month. 				



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3	The detailed design of the land discharge proposed for Stage 1B shall be included in the Discharge to Land Management Plan (Schedule 1: Condition 4, Table 2).	~		A detailed design is included in the draft version of the Discharge to Land Management Plan.
4	The detailed design for Stages 2A and 2B land discharge shall be included within any revision to the Discharge to Land Management Plan in accordance with Schedule 1: Condition 11.		N/A	
5	The design of the land discharge for Stages 1B, 2A and 2B shall be undertaken to, where practicable, ensure that the discharge of treated wastewater to the land discharge areas shall:	~		Stage 1B system design meets these requirements.
	 Be evenly distributed to the entire area being utilised for land discharge; 			
	b) Not cause runoff or surface ponding;			
	c) Not lead to the development of anaerobic soil conditions; and			
	 Avoids the discharge of wastewater to land within 125m of the property boundary, except that wastewater may be discharged to land within 25m from the property boundary where: 			
	(i) Median E. Coli. concentrations are less than 100cfu/100ml; and			
	(ii) Irrigation is at low pressure (less than 1.4 bar);			
	 (iii) The irrigation nozzle height does not exceed 1.52m from ground level and does not incorporate an "end gun"; and 			
	(iv) Where wind speed does not exceed 12m/s (or 4m/s sustained for a period of 15 minutes or more) in a direction toward an existing dwelling (at the time of commencement of these consents) on an adjoining site within 300m of the irrigation area.			
6	The discharge of treated wastewater to land discharge areas shall occur in accordance with the certified Discharge to Land Management Plan (Schedule 1: Condition 4, Table 2).	7		Draft prepared but not certified, operating according to SOPS and consent conditions.
7	The Consent Holder shall continuously measure and maintain daily records of wastewater flows entering the Greytown WWTP and the volume of the treated wastewater discharged to land discharge areas, to record the quantity of material being received and applied.	4		Daily wastewater flows have been recorded.
8	The Consent Holder shall record the location and volume applied to various discrete land discharge areas within the land discharge system.	~		Location and volume of discrete land discharge areas have been recorded, currently all wastewater discharged to land is disposed of at Stage 1B land discharge area.



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9	The Consent Holder shall monitor on a monthly basis in accordance with Schedule 6: Table 1 and maintain records of the wastewater quality discharged to the land discharge areas in accordance with the approved Discharge to Land Management Plan.			Monthly recording of wastewater quality has been done in accordance with the environmental monitoring plans.
10	The Consent Holder shall record crop and pasture management practices across the land discharge areas including:	7		Recorded on ID and by the cropper.
	a) Cultivation date;			
	b) Sowing date;			
	c) Fertiliser applications;			
	d) Harvesting; and			
	e) Any other management practices			
11	The Consent Holder shall carry out groundwater sampling according to the constituents and frequency specified in the Environmental Monitoring Plan; and samples shall be taken in accordance with the most recent version of		X	Groundwater monitoring was scheduled incorrectly for this period. It is not clear how this occurred but only Conductivity, Chloride, and pH were monitored [non- compliant].
	Wellington Regional Council's groundwater sampling protocol.			Further, only bore B & D could be sampled due to lack of access to bore C following a storm event [non-compliant].
12	The groundwater monitoring locations outlined in the Environmental Monitoring Plan shall include at least three groundwater monitoring wells (to be installed by the Consent Holder) to ensure any potential contamination leaving any of the land discharge areas is detected before it reaches any water supply bore or surface water.	~		Bores B, C, and D in EMP were installed to fit this purpose.
13	The groundwater monitoring bore locations outlined in the Environmental Monitoring Plan shall also include existing nearby privately owned water supply bores (the actual locations and number of sites shall be determined during the development of the Environmental Monitoring Plan).		X	Draft EMP states that JR Pack House bore is also to be used for groundwater monitoring. Wellington Water has been unsuccessful in attempts to arrange this with them [non-compliant].
14	During Stages 1B, 2A and 2B, the Consent Holder shall undertake soil monitoring in accordance with the Environmental Monitoring Plan during the period of September and October every second year to assess soil health and performance of the land discharge scheme.			Soil fertility and soil texture analysis occurred in September/October 2023.
15	The findings and results of monitoring undertaken under Schedule 4: Conditions 7 to 14 shall be incorporated and submitted in the Annual Report (Schedule 1: Condition 26).	~		Findings and results have been submitted.



	Summary of Conditions	Cond	Condition met?		Comments
	Schedule 5: Discharge to land via seepage from GWWTP oxidation ponds	Yes ✓	No X	NA	
1	The rate of discharge to land (and subsequently groundwater) from the base and sides of the oxidation and maturation ponds and base via seepage is for 24 hours per day, seven days per week, 52 weeks per year.			N/A	
2	The Consent Holder shall complete, on a 10 yearly basis, a pond water balance assessment to determine the volume of seepage that may be occurring. The first of these assessments shall be completed within 36 months of the commencement of these consents.				Completed in the 2018/2019 period. Reported an estimated leakage of 13.5% inflow.
3	Results will be analysed and reported to the Wellington Regional Council including any recommended actions, such as groundwater monitoring, as part of the first annual report (Schedule 1: Condition 26) following the conclusion of the water balance assessment and analysis.			N/A	



GWRC compliance rating system

 FULL COMPLIANCE – All conditions met – well done! No further action required All conditions assessed are met including supplying information and/or records
LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required
• Minor breach of effects based conditions or works outside scope of consent with low risk of adverse environmental effects
Breach of conditions which is technical in nature (eg, failure to submit monitoring report or records)
MODERATE NON-COMPLIANCE – Some condition(s) not met. Action required
Repeated failure to supply monitoring report or records.
• Breach of conditions where there are some environmental consequences and/or moderate risk of adverse environmental
effects
SIGNIFICANT NON-COMPLIANCE – Many condition(s) not met. Immediate action required
• Breach of conditions where there are significant environmental consequences and/or high risk of adverse environmental
effects

VERY GOOD	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.
GOOD	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.
FAIR ★★★★	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.
POOR	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.

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*.