






## DRAFT compliance monitoring assessment, 1 July 2017 – 30 June 2018


Consent No:	WGN980083	Date: 12 September 2019	Monitoring officer: Josie Burrows
Activity:	[496] To occupy and use the coastal marine area with a concrete deflection wall and outfall structures [1536] To discharge contaminants to air from the Porirua City Council Wastewater Treatment Plant [33805] To discharge treated effluent from the Porirua City Council's Wastewater Treatment Plant		

### Your compliance rating

This report covers the period 1 July 2017 to 30 June 2018. The consents have been rated as follows:

[1536]		<b>COMPLYING</b> Well done! No further action required for this consent.
[469]		<b>MINOR NON-COMPLIANCE</b> Condition(s) not met / Action required (see comments below)
[33805]		<b>NON-COMPLIANCE</b> Condition(s) not met / Immediate action required (see comments below)

*Overall compliance summary for the Porirua Wastewater Treatment Plant:*

<b>FAIR</b> 	Overall fair management of site and consents. The consent holder struggled to meet aspects of their consent requirements. There were more than occasional breaches of consent conditions that manage environmental effects and/or issues with meeting administrative related consent conditions.
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### Comments

#### WGN980083 [33805] To discharge treated effluent from the Porirua City Council's Wastewater Treatment Plant

##### Quality of effluent discharge

Condition 11 requires the consent holder take the following samples for the specified analyses and compare to the consented limits:

- Daily 24 hour flow proportioned composite - Biochemical Oxygen Demand (BOD<sub>5</sub>) and suspended solids
- At least 20 grab samples per month - faecal coliform bacteria
- Quarterly 24 hour flow proportioned composite – specified metals and other compounds

The consent holder completed all required testing. There were no exceedances of the consent requirements for BOD<sub>5</sub>, suspended solids, faecal coliforms, specified metals and other compounds.

### Volume of effluent discharge

Condition 12 requires the consent holder to continuously monitor and record the treatment plant effluent flow. The consent authorises the average discharge flow of 24,000m<sup>3</sup>/day and peak discharge of 92,800m<sup>3</sup>/day.

The average discharge flow of 24,000m<sup>3</sup>/day was exceeded in eight months during this year, and the annual average flow also exceeded this limit at 26,732m<sup>3</sup>/day. There were no exceedances of the peak flow rate during this compliance period.

The consent holder advised the effluent flow rate has increased since the previous year due to improvements throughout the Porirua network, wet weather during the summer period, and population increase in Porirua. They expect the effluent flow to/from the wastewater treatment plant to increase for these reasons.

### Shoreline monitoring

Condition 14 requires monthly and post overflow discharge event monitoring for enterococci and faecal coliforms to be undertaken at six shoreline locations between Titahi Bay Beach and Te Korohiwa Rocks.

The annual report identified that samples are collected during an overflow discharge event, and if there is no overflow discharge event during the month, the samples are collected at the end of the month. I consider the wording of the condition requires shoreline sampling to be undertaken if there is a discharge event **in addition** to monthly non-event monitoring, so that there is an understanding of the standard operational and discharge event effects on coastal water quality.

**In future, please ensure samples are taken monthly and discharge event samples are taken in addition to the monthly sample.** Note: this compliance report was written at the same time as the 2018 – 2019 compliance report, so it is not expected this is implemented until the 2019 – 2020 period.

### Bypass and overflow events

There were 16 consented bypass/overflow events during this compliance year, which triggered the required shoreline monitoring above. These bypass/overflow events appear to have been caused by sludge carryover due to wet weather and heavy rainfall.

There were no non-consented bypass/overflow events.

### Minimising infiltration and ingress to the sewerage system

Condition 23 requires the consent holder investigate and implement ways and means of minimising infiltration and stormwater ingress into the sewerage system, and report annually on the progress made.

In this compliance year, ten long-term wastewater flow monitors, six overflow monitors and four rain gauges were installed in the Porirua catchment to evaluate the extent of inflow and infiltration and develop management options. A short term monitoring programme was carried out in Cannons Creek,

and properties in Cannons Creek and Mana were investigated. Water quality monitoring, which is used to assess and prioritise catchments for investigation, was continued.

A feasibility study on the upgrade of the City Centre (PS20) and Tangare Drive (PS34) pump stations, as well as a storage tank in the city centre were undertaken. Numerous wastewater and stormwater asset renewals and investigation works were also completed.

Overall, I consider these works to be very positive, and agree they will improve the reliability of the wastewater network and have positive public health outcomes.

#### Community Liaison Group

The consent holder held the annual meeting on 18 October 2017 and distributed the minutes of this meeting to the group, thus fulfilling the obligations of condition 24.

#### Overall rating

Overall, this consent is rated as *Non-complying (Major)*. This is due to the continued non-compliance with condition 12 with the discharge beyond the consented scope.

#### **WGN980083 [1536] To discharge contaminants to air from the Porirua City Council Wastewater Treatment Plant**

This consent is rated as *Complying*. Please continue to comply with all consent conditions.

#### **WGN980083 [496] To occupy and use the coastal marine area with a concrete deflection wall and outfall structures**

Compliance correspondence indicates that the 'elbow' of the outflow pipe was damaged during storm conditions. This is being addressed through actions required by the 2018-19 compliance report.

This consent is rated as *Non-complying (Minor)*, due to the damage to the outflow pipe.

#### **Obligations**

Please note that the Greater Wellington Regional Council (GWRC) has a responsibility to enforce 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 consent.

On this occasion we have decided not to take any enforcement action. 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 consent.

Your consent incurs variable compliance monitoring charges at your consent anniversary. These charges are likely to increase to reflect any additional time spent monitoring your consent to due to non-compliance.

## GWRC compliance rating system

	<p><b>COMPLYING – Well done! No further action required – keep complying with your consent conditions</b></p> <ul style="list-style-type: none"> <li>Administrative conditions assessed are met (e.g. supplying information and/or records)</li> <li>Effects based and best practice conditions assessed are met (e.g. complying with any maximum limits)</li> <li>Some very minor breaches of consent conditions where no explanation or follow up is considered to be required</li> </ul>
	<p><b>MINOR NON-COMPLIANCE – Condition(s) not met / Some action required</b></p> <ul style="list-style-type: none"> <li>Failure to supply information and/or keep adequate records. Failure to adequately notify GWRC of works</li> <li>Minor works outside scope of consent issued but within scope of environmental effects considered when consent processed.</li> <li>Minor breach of effects based or best practice consent conditions</li> </ul>
	<p><b>NON-COMPLIANCE – Condition(s) not met / Immediate action required</b></p> <ul style="list-style-type: none"> <li>Previous minor non-compliance has not been fixed or corrected</li> <li>Breach of effects based or best practice consent condition with more than minor actual or potential environmental effects</li> <li>Works outside scope of consents with more than minor actual or potential environmental effects</li> </ul>

<p><b>VERY GOOD</b></p> <p>★★★★★</p>	Overall excellent management of site and consents. The consent holder is proactive in meeting their consent requirements. If issues have arisen concerning consent conditions, the consent holder responds with promptness and effectiveness.
<p><b>GOOD</b></p> <p>★★★★☆</p>	Overall good management of site and consents. The consent holder is generally on top of meeting their consent requirements. Whilst there are some minor breaches of consent conditions, these have no ongoing environmental effects.
<p><b>FAIR</b></p> <p>★★★☆☆</p>	Overall the management of site and consents is considered to be fair. There are occasional breaches of consent conditions and/or lapses in providing information to GWRC.
<p><b>POOR</b></p> <p>★★☆☆☆</p>	Overall the management of site and consents is considered to be poor. There are consistent and ongoing breaches of consent conditions. The consent holder is not getting on top of their consent requirements.

## 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*.