

Site Compliance Report

Site No: REG603968
Site Owner: Waikato District Council
Site Name: Ngaruawahia WWTP: Old Taupiri Rd, Hopuhopu
Date: 18 January 2022

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH119642.01.02	Current	Discharge up to 11,200 cubic metres per day of treated wastewater from the Ngaruawahia WWTP into the Waikato River	14/04/2011	31/03/2029
AUTH119643.01.01	Current	Discharge contaminants to air from activities associated with the Ngaruawahia WWTP	14/04/2011	31/03/2029
AUTH119644.01.01	Current	Discharge treated municipal wastewater sludge onto land during pond de-sludging from activities associated with the Ngaruawahia WWTP	14/04/2011	31/03/2029
AUTH119645.01.01	Current	Use, upgrade and maintain an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Ngaruawahia WWTP	14/04/2011	31/03/2029
AUTH119646.01.01	Current	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Ngaruawahia WWTP	14/04/2011	31/03/2029
AUTH124828.01.01	Current	To discharge biosolids to land	23/10/2012	30/11/2022

This report examines the level of compliance of Waikato District Council with the selected conditions of the resource consents.

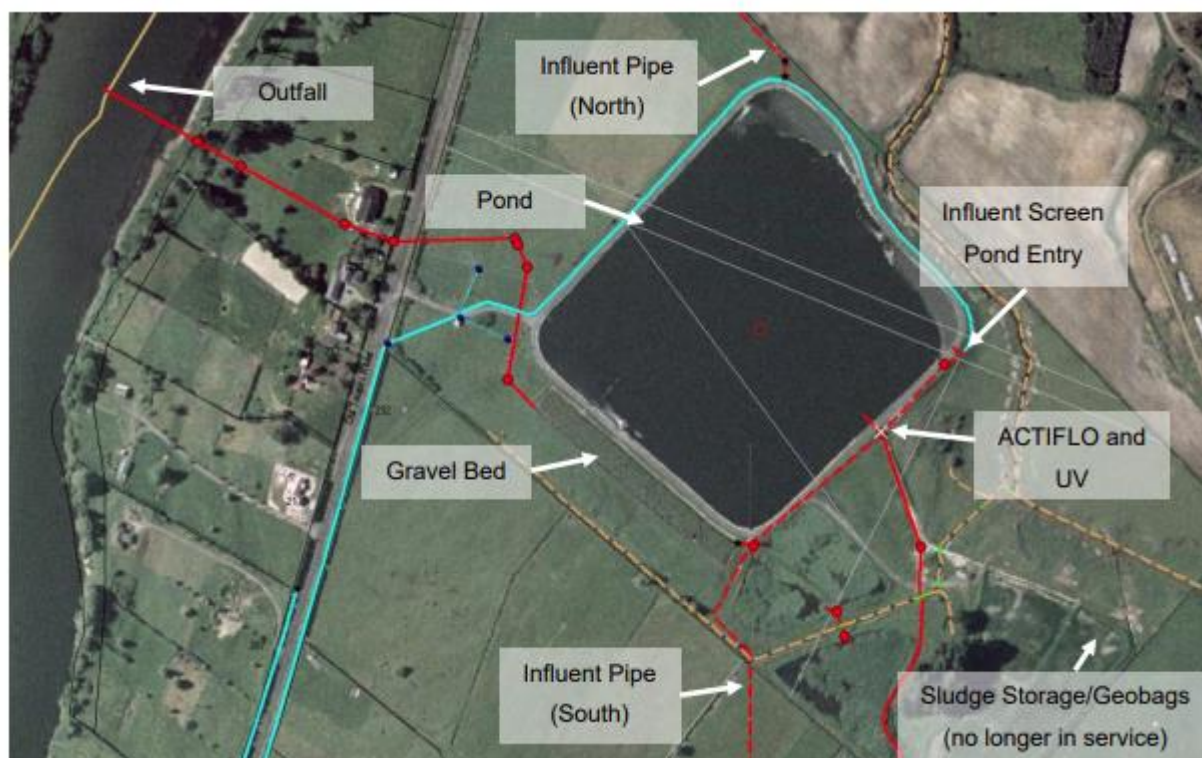
2 BACKGROUND

The Ngaruawahia wastewater treatment plant (WWTP) is operated by Watercare Services Limited under a contractual arrangement with Waikato District Council (WDC) on behalf of the community.

The Ngaruawahia WWTP is comprised of the following processes:

- Raw Influent screening;
- Oxidation pond;
- Pond outlet screening;
- Solids removal with ACTIFLO and chemical dosing including;
 - o Coagulant (alum) dosing;
 - o Polymer dosing;
 - o Caustic dosing.
- Ultraviolet (UV) disinfection;

- Gravel-bed/rock lined channel;
- Waikato River outfall diffuser.



2.1 PREVIOUS COMPLIANCE HISTORY

A formal warning (doc ref 18433147) was issued in relation to the significant non-compliance attained in the previous annual audit for the period 1 July 2019 to 30 June 2020.

Date Period	Site Compliance
1 July 2020 to 30 June 2021	Moderate Non-Compliance
1 July 2019 to 30 June 2020	Significant non-compliance
1 July 2018 to 30 June 2019	Partial compliance
1 July 2017 to 30 June 2018	High level of compliance
1 July 2016 to 30 June 2017	High level of compliance

Please note: For the 2021-22 compliance year WRC has commenced using the new MfE compliance monitoring scoring regime that has been implemented nationwide for all regional councils. This new scoring system is designed to bring all the regions into line and make the measuring of national compliance much easier to compare.

3 COMPLIANCE ASSESSMENT

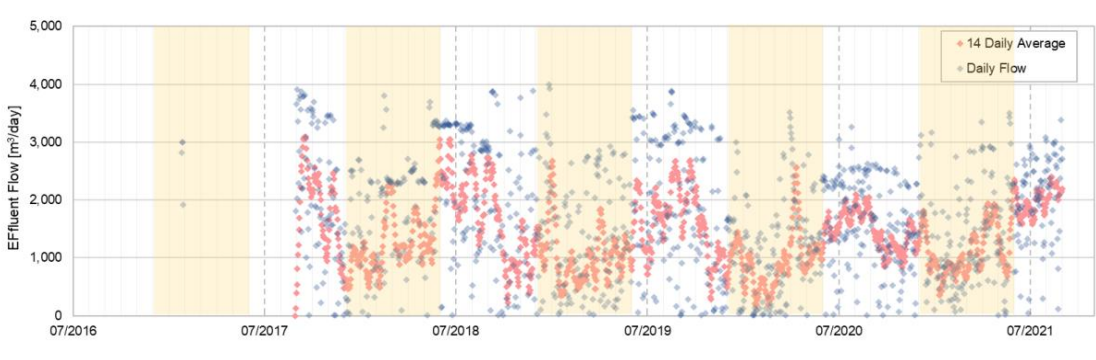
Unless otherwise specified in this document this assessment covers the period from **1 July 2020 to 30 June 2021**.

This compliance assessment has been undertaken based on the submitted annual report by the consent holder, monitoring data supplied throughout the compliance period and any site inspections undertaken. Some administration, duplicate or irrelevant conditions have been omitted for brevity.

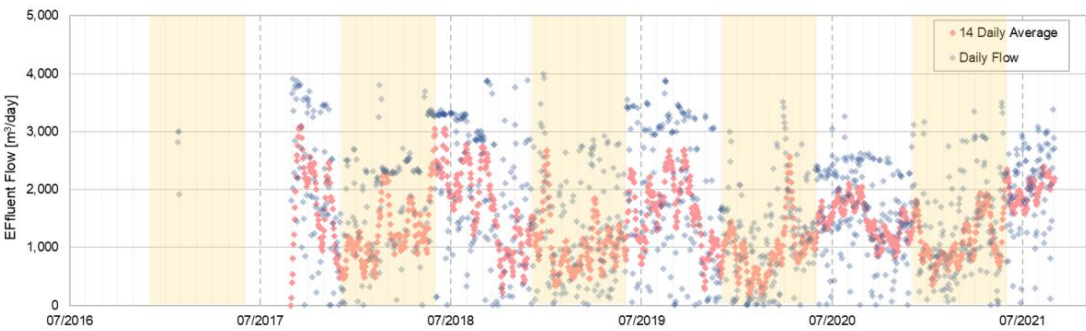
Please note that a description of the classification system used to describe compliance status is given in Appendix 1 of this report.

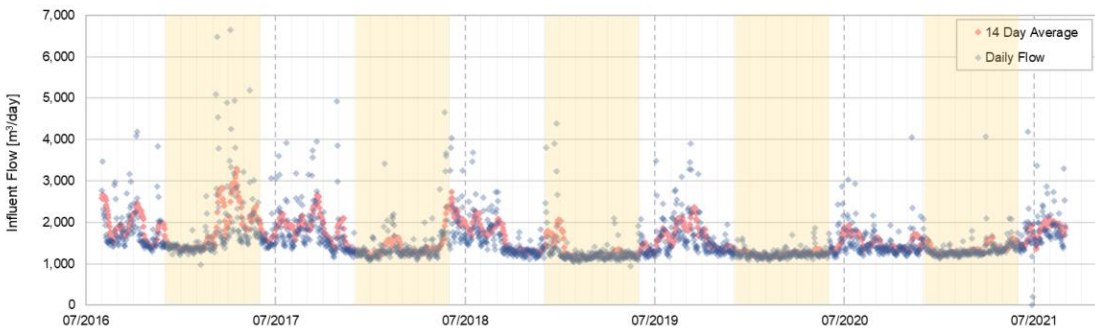
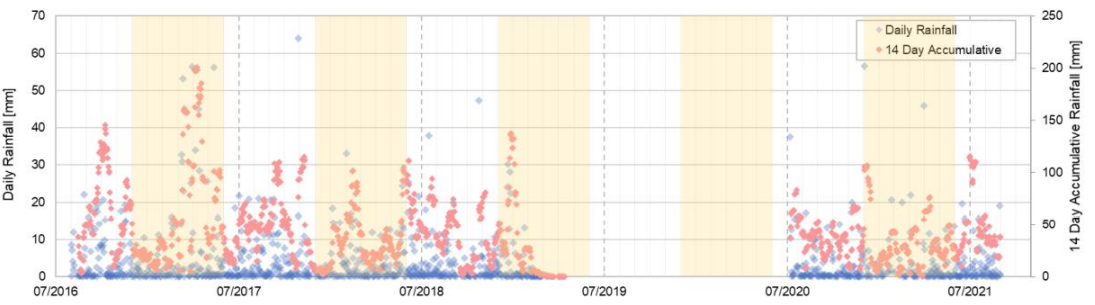
AUTH119642.01.02 - Water - sewage

Activity Authorised: Discharge up to 11,200 cubic metres per day of treated wastewater from the Ngaruawahia WWTP into the Waikato River	
Condition No.	Description
1	The wastewater treatment and disposal system shall be designed, operated and maintained in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below which shall prevail should any inconsistency occur between the conditions and the above documents.
Evidence	
Status Reasoning	
Action Required	Full Compliance
3	Notwithstanding the stated limits in conditions of this consent, the consent holder shall make all reasonable and practical efforts to ensure that the final wastewater quality is maximised within the capabilities of the treatment system at all times.
Evidence	
Status Reasoning	
Action Required	Full Compliance
4	The maximum volume of treated wastewater discharged shall not exceed 11,200 cubic metres per day.
Evidence	Compliant (see chart pg 24)

	
Status Reasoning	
Action Required	<div>Full Compliance</div>
6	<p>The consent holder shall ensure that, no later than 1 December 2012, the quality of the discharge immediately prior to entering the rock-lined channel shall comply with the following limits: i) The pH of the discharge shall not be less than 6 or greater than 9 pH units; ii) The median five day carbonaceous biochemical oxygen demand concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; iii) The median suspended solids concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; iv) The median ammoniacal-nitrogen concentration shall not exceed 10 grams per cubic metre and the 90th percentile shall not exceed 20 grams per cubic metre; v) The median total nitrogen (TN) concentration shall not exceed 25 grams per cubic metre; vi) The median summer (December to May inclusive) total nitrogen (TNsummer) concentration shall not exceed 20 grams per cubic metre; vii) The median summer (December to May inclusive) total nitrogen load (TNload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 57 kilograms per day; viii) The median total phosphorus (TP) concentration shall not exceed 8 grams per cubic metre; ix) The median summer (December to May inclusive) total phosphorus (TPsummer) concentration shall not exceed 8 grams per cubic metre; x) The median summer (December to May inclusive) total phosphorus load (TPload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 17.3 kilograms per day; xi) The median Escherichia coli (E.coli) concentration shall not exceed 126 cfu per 100 millilitres. For the purposes of this condition, to determine compliance with the median limits (excluding E.coli) no more than six samples in any 12 consecutive monthly samples over the period 1 July to 30 June each year shall exceed the specified limit. To determine compliance with the summer median limits, no more than 3 of the 6 monthly samples in any given summer (December to May) shall exceed the specified limit. To determine compliance with the median E.coli limit, no more than 26 samples in any 52 consecutive weekly samples shall exceed the specified limit. To determine compliance with the 90th percentile limits, no more than one sample in any ten consecutive monthly sampling events shall exceed the specified limit. Note: The discharge of treated wastewater to the Waikato River from the Huntly Wastewater Treatment Plant is authorised by consent 119647.</p>
Evidence	<p>i) The pH of the discharge shall not be less than 6 or greater than 9 pH units; - Compliant</p> <p>ii) The median five-day carbonaceous biochemical oxygen demand concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; Compliant</p> <p>iii) The median suspended solids concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; Compliant</p> <p>iv) The median ammoniacal-nitrogen concentration shall not exceed 10 grams per cubic metre and the 90th percentile shall not exceed 20 grams per cubic metre; Non-compliant 26.6g/m³</p> <p>v) The median total nitrogen (TN) concentration shall not exceed 25 grams per cubic metre; Non-compliant 30g/m³</p> <p>vi) The median summer (December to May inclusive) total nitrogen (TNsummer) concentration shall not exceed 20 grams per cubic metre; Non-compliant 26g/m³</p> <p>vii) The median summer (December to May inclusive) total nitrogen load (TNload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 57 kilograms per day; Compliant</p> <p>viii) The median total phosphorus (TP) concentration shall not exceed 8 grams per cubic metre; Compliant</p>

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Status Reasoning		
Action Required	Please take action to improve the wastewater treatment quality to compliant levels.	Moderate Non-Compliance
7	Decommissioning of the wetland and gravel filter and construction of the rock-lined channel shall be completed by 23 April 2013.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
8	The consent holder shall decommission the wetland and gravel filter, and construct the rock-lined channel in such a manner so as to minimise sediment losses. To this end the works shall be undertaken in such a manner so that they are consistent with the Waikato Regional Council document titled "Erosion and Sediment Control – Guidelines for Soil Disturbing Activities" (Technical Report No.2009/02, dated January 2009).	
Evidence		
Status Reasoning		
Action Required		Full Compliance
9	At least one month prior to decommissioning the wetland and gravel filter, the consent holder shall provide a Management Plan to the Waikato Regional Council which details as a minimum how the decommissioning works and construction of the rock-lined channel will be undertaken, the design plan for the rock-lined channel, and how compliance will be achieved with condition 8. Note: The Waikato Regional Council reserves the right to make comment on the Management Plan submitted and any subsequent changes to the Management Plan.	
Evidence		
Status Reasoning		
Action Required		Not assessed
10	Should the measured median concentration or 90th percentile concentration for either five-day carbonaceous biochemical oxygen demand, suspended solids, or ammoniacal-nitrogen exceed 90% of the consented limits, as specified in condition 6 of this consent, for 2 of 3 consecutive years then a "trigger" level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the "trigger" level is reached. The upgrade undertaken shall be designed to reduce the median or 90th percentile concentration, as applicable, for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.	
Evidence	The Trigger Level was met for ammoniacal nitrogen median and 90th percentile concentrations due to breaches in compliance years 2018/19, 2019/20 and 2020/21.	

Status Reasoning	<p>As a result of the trigger level for ammoniacal nitrogen being met the following action is required to be taken by the consent holder.</p> <p>The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the median or 90th percentile concentration, as applicable, for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.</p>	
Action Required	<p>The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached which was 30 June 2021. That date for an upgrade is 1 July 2023 and a plan for the upgrade to the plant should be submitted to WRC as soon as possible.</p>	Significant Non-Compliance
11	<p>Should the measured median concentration for total nitrogen (TN), total phosphorus (TP) or E.coli exceed 90% of the consented limits, as specified in condition 6 of this consent, for 2 of 3 consecutive years then a “trigger” level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the median concentration for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.</p>	
Evidence	<p>The Trigger Level was met for TN median and summer median concentrations due to breaches in compliance years 2018/19, 2019/20 and 2020/21.</p>	
Status Reasoning	<p>The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the median concentration for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.</p>	
Action Required	<p>The consent holder is required to design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. the trigger level was reached by 30 June 2021. therefore, the date for the upgrade to be commissioned by 1 July 2023.</p>	Significant Non-Compliance
12	<p>Should the measured median summer (December to May inclusive) mass load for either total nitrogen (TNload) or total phosphorus (TPload) for Huntly and Ngaruawahia combined exceed 90% of the consented limit, as specified in condition 6 of this consent, on 2 of 3 consecutive summer periods then a “trigger” level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the combined summer mass load of the nutrient for which the trigger was reached to less than 80% of the consented limit for that parameter.</p>	
Evidence	<p>The Trigger Level for Condition 12 was not met for any consecutive years.</p>	
Status Reasoning		
Action Required		Full Compliance
14	<p>The consent holder shall continuously monitor the flow rate of wastewater entering and leaving the treatment plant and shall record the total daily influent and discharge volumes.</p>	
Evidence		

Status Reasoning																										
	Action Required	Full Compliance																								
	15	The consent holder shall continuously monitor and record rainfall at the site on a daily basis.																								
Evidence	pg18 																									
Status Reasoning																										
	Action Required	Full Compliance																								
	16	<p>The consent holder shall, prior to January each year, calculate the ratio of daily Peak Wet Weather Flow (PWWF) to Average Dry Weather Flow (ADWF). Where the ratio of PWWF to ADWF exceeds 4.5, the consent holder shall prepare an Infiltration Management Plan and provide this to Waikato Regional Council for review prior to implementation. For the purposes of this condition, calculation of ADWF will be taken as the median daily wastewater flow measured at the inlet to the oxidation pond during the month of March for the preceding year.</p>																								
Evidence	<p>The Ngaruawahia WWTP is designed to receive an Average Dry Weather Flow (ADWF) of 2,500 m³/day and a Peak Wet Weather Flow (PWWF) of 6,000 m³ /day (MWH, 50 Year Wastewater Strategy, 2014).</p> <p>for 20-21 compliance period the ratio was 3.4</p> <table><thead><tr><th>Compliance Period</th><th>PWWF (m³/d)</th><th>ADWF (m³/d)</th><th>Ratio (PWWF/ADWF)</th></tr></thead><tbody><tr><td>July '16 - June '17</td><td>6,643</td><td>1,280</td><td>5.2</td></tr><tr><td>July '17 - June '18</td><td>4,929</td><td>1,220</td><td>4.0</td></tr><tr><td>July '18 - June '19</td><td>4,385</td><td>1,210</td><td>3.6</td></tr><tr><td>July '19 - June '20</td><td>3,897</td><td>1,200</td><td>3.2</td></tr><tr><td>July '20 - June '21</td><td>4,189</td><td>1,230</td><td>3.4</td></tr></tbody></table>		Compliance Period	PWWF (m ³ /d)	ADWF (m ³ /d)	Ratio (PWWF/ADWF)	July '16 - June '17	6,643	1,280	5.2	July '17 - June '18	4,929	1,220	4.0	July '18 - June '19	4,385	1,210	3.6	July '19 - June '20	3,897	1,200	3.2	July '20 - June '21	4,189	1,230	3.4
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Status Reasoning	
Action Required	Full Compliance
17	The consent holder shall define a sampling location or locations and the sampling method or methods to be used for monitoring the parameters in conditions 5 and 6. The location(s) and method(s) used for the sampling shall be to the satisfaction of Waikato Regional Council.
Evidence	
Status Reasoning	
Action Required	Full Compliance
18	The consent holder shall take grab samples of the treated wastewater on a monthly basis, from the sampling location specified in condition 17 of this consent, for the purpose of determining compliance with conditions 5 and 6. E.coli grab samples shall be taken on a weekly basis.
Evidence	
Status Reasoning	
Action Required	Full Compliance
19	All wastewater quality analyses shall be undertaken by an IANZ accredited or equivalent laboratory. All methods used shall be appropriate for the wastewater analyses undertaken.
Evidence	
Status Reasoning	
Action Required	Full Compliance
20	The consent holder shall prepare an Operations and Management Plan. This Plan shall be prepared by a suitably qualified and experienced person and shall detail how the treatment system is to be operated and maintained to ensure compliance with the conditions of this consent and consent 119643, 119644 and 119645. As a minimum the Plan shall include the following matters: i) A description of the wastewater treatment plant including as-built plans for the wastewater treatment facilities; ii) A description of the sequence, timing and methods of construction of upgrades to the treatment plant; iii) A description and schedule of the routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation; iv) A schedule of monitoring to be carried out to ensure effective plant operation and compliance with consent conditions; v) A sampling location plan; vi) A schedule of the treatment plant critical aspects and the detailed response and contingency plans to address anticipated variations from normal plant operation; vii) Procedures for recording routine maintenance and all repairs that are undertaken; viii) Chain of command, responsibility and notification protocols; ix) The current infiltration management plan; x) The operation of the de-sludging pond; xi) Procedures for improving and/or reviewing the plant management plan. This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so. Note: The Waikato Regional Council reserves the right to make comment on the Operations and Management Plan submitted and any subsequent changes to the Plan.
Evidence	<p>i) A description of the wastewater treatment plant including as-built plans for the wastewater treatment facilities; Compliant with the description but no as-builts were included.</p> <p>ii) A description of the sequence, timing and methods of construction of upgrades to the treatment plant; the O&M Plan states:</p> <p><i>There are no planned upgrade works for the plant. There are a couple of matters that are still outstanding at the time of this update of the O & M Plan. These include: The remaining sludge that is stored in the storage pond needs to be removed and the remainder of the pond area converted to Geotube pad; There would be an advantage in installing a rectangular discharge weir at the inlet to the Johnson screw screen to prevent the oxidation being accidentally lowered if certain valves are left in the "open" position or if the volume processed through the Actiflo is excessive for a few days. As the connected population increases the quality of organic treatment in the oxidation</i></p>

	<p>pond will deteriorate and further in-pond treatment may be required. The quality of the effluent from the pond needs to be monitored regularly and upgrade works planned as needed. The upgrade to in-pond treatment is likely to require additional aeration by way of bottom-deployed air diffusers, possibly with Aqua Mats – such upgrades could be staged.</p> <p>iii) A description and schedule of the routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation; - Compliant</p> <p>iv) A schedule of monitoring to be carried out to ensure effective plant operation and compliance with consent conditions; - Compliant</p> <p>v) A sampling location plan; Non-compliant as no sampling location plan is included in the plan</p> <p>vi) A schedule of the treatment plant critical aspects and the detailed response and contingency plans to address anticipated variations from normal plant operation; Compliant</p> <p>vii) Procedures for recording routine maintenance and all repairs that are undertaken; Compliant but could be better</p> <p>viii) Chain of command, responsibility and notification protocols; Non-compliant as the listed staff have nearly all moved on from WDC</p> <p>ix) The current infiltration management plan; Non-compliant, some details about infiltration are included but no plan.</p> <p>x) The operation of the de-sludging pond; Non-compliant, no specific information on the operation of the desludging pond</p> <p>xi) Procedures for improving and/or reviewing the plant management plan. Non-compliant, no details on improving or reviewing the plan are included.</p> <p>This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so</p>	
Status Reasoning	The plan was submitted in 2014 (doc ref 3516605) and has not been reviewed or updated since that time.	
Action Required	Please review and update the O&M plan to ensure the plan is relevant and matches the current site layout and processes that exist on site. Don't forget to update the contact details.	Low Risk Non-Compliance
21	The treatment system and discharge to the Waikato River shall be operated, maintained and managed by appropriately experienced personnel in accordance with the Operations and Management Plan pursuant to condition 20 of this consent.	
Evidence	WDC/WSL staff are appropriately experienced personnel however the O&M plan does not include mention of many aspects of the site operation that they currently undertake.	
Status Reasoning		
Action Required		Full Compliance
22	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
23	In conjunction with consent 119643, the consent holder shall maintain and keep a Complaints Register for all complaints made about the treatment and discharge operations received by the consent holder. The Register shall record: i) The date, time and duration of the event/incident that has resulted in the complaint; ii) The location of	

	the complainant when the event/incident was detected; iii) The possible cause of the incident; iv) The weather conditions and wind direction at the site when the incident allegedly occurred, if significant to the complaint; v) Any corrective action undertaken by the consent holder in response to the complaint. The Register shall be made available to the Waikato Regional Council at all reasonable times. Complaints which may indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 working days of the complaint being received.	
Evidence	WDC operates a CRM complaints system	
Status Reasoning		
Action Required		Full Compliance
24	The consent holder shall place and maintain a sign in the vicinity of the discharge to the Waikato River, in such a way that it is conspicuous to river users, advertising of the presence of the wastewater discharge and warning against the use of the location for swimming.	
Evidence	The dive report of March 2021 states that no sign is in place.	
Status Reasoning		
Action Required	Please ensure that WDC/WSL places and maintains a sign in the vicinity of the discharge to the Waikato River, in such a way that it is conspicuous to river users, advertising of the presence of the wastewater discharge and warning against the use of the location for swimming	Low Risk Non-Compliance
25	The consent holder shall maintain landscape and screen planting as detailed in the report titled "Waikato District Council Ngaruawahia Waste Water Treatment Visual Analysis", dated March 1998, and recorded on Waikato Regional Council's document system numbered 67984.	
Evidence		
Status Reasoning		
Action Required		Not assessed
26	The consent holder shall be responsible for any erosion that occurs as a result of the exercise of this consent and for any erosion works that become necessary to preserve the integrity and stability of the banks of the Waikato River. Note: A separate resource consent may be required as a result of the need to undertake erosion control works. Any such consent shall be obtained by the consent holder at their sole expense prior to any works being undertaken.	
Evidence	No details or reports of any erosion issues at the Ngaruawahia site have been reported	
Status Reasoning		
Action Required		Not assessed
27	The discharge to the Waikato River shall be via a multi-port diffuser located on the bed of the Waikato River.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
28	Ports 2, 4, 6 and 8 of the diffuser, as numbered from the true right bank of the Waikato River, shall remain closed unless specifically permitted in writing by the Waikato Regional Council.	
Evidence	Unable to assess which ports were open or blocked/closed due to a lack of information in the dive report of March 2021.	

Status Reasoning		
Action Required		Low Risk Non-Compliance
29	The consent holder shall maintain the outfall diffuser in an operational state such that the discharge from ports 1, 3, 5, 7 and 9 is uniform along the operational length of the diffuser and providing effective dispersion of the wastewater in the river flow.	
Evidence	Unable to assess which ports were open or blocked/closed due to a lack of information in the dive report of March 2021.	
Status Reasoning		
Action Required		Low Risk Non-Compliance
30	The consent holder shall undertake a survey of the diffuser at six monthly intervals to demonstrate compliance with conditions 28 and 29 of this consent. The frequency of the surveys may be reduced to no less than every two years following written request to and approval from the Waikato Regional Council. The results of each survey and any recommendation as to the frequency of future surveys shall be provided to the Waikato Regional Council within 30 days of the survey.	
Evidence	Dive surveys now undertaken at yearly intervals by mutual agreement between the consent holder and WRC	
Status Reasoning		
Action Required		Full Compliance
31	The consent holder shall forward the results of the monitoring undertaken pursuant to conditions 14, 15 and 18 to the Waikato Regional Council, via electronic means, within one month of receipt of the results by the consent holder.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
32	The consent holder shall provide to the Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental Unit), and Hopuhopu Manawhenua Roopu a written report by 30 September each year addressing the following: i) A summary of the monitoring results required by conditions of this resource consent for the year ending 30 June; ii) Critically analyse the monitoring data collected and comment on any emerging trends; iii) Comment on compliance with the conditions of this resource consent; iv) Any reasons for non-compliance or difficulties in achieving compliance with the conditions of this resource consent and a description of and a summary of the efficacy of any remedial works undertaken; v) Comment on infiltration rates and any remedial works planned and the efficacy of these works in subsequent reports; vi) Any other issue considered relevant to the consent holder. A quarterly report shall be prepared and distributed at the end of March, June and December of each year. These progress reports shall address the monitoring results for the preceding 12 months, including the rolling 12 month median value. The reports shall be distributed to Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental Unit), and Hopuhopu Manawhenua Roopu.	
Evidence	WRC assumes this is being done	
Status Reasoning		
Action Required		Full Compliance
33	The consent holder shall notify the Waikato Regional Council within 24 hours (where practicable) of the consent holder becoming aware of the limits specified in conditions 4, 5 and 6 of this resource consent being exceeded, or any accidental discharge, plant breakdown or other circumstance which is likely to result in the limits of this consent	

	being exceeded. The consent holder shall, within 10 working days of the incident occurring, provide a written report to the Waikato Regional Council, identifying the breach, possible causes and steps to ensure future compliance.	
Evidence	The consent holder notifies WRC of any significant issue pertaining to plant performance.	
Status Reasoning		
Action Required		Full Compliance
34	The consent holder shall as soon as reasonably practicable, notify the Waikato District Council (Community Assets – Operations Unit), Watercare Services Limited, and the Waikato Regional Council of an event that may in itself, or as a consequence of an event, have a significant adverse effect on the quality of the water within the Waikato River at the abstraction points of the Hopuhopu, Huntly, Te Kauwhata and Tuakau (Auckland) Water Supplies. The consent holder shall record the reasons why the situation occurred, the actions taken by the consent holder and an assessment of what measures can be adopted in the future to minimise such occurrences and upon written request from the Waikato Regional Council provide a report to the Waikato Regional Council and the Medical Officer of Health addressing this matter.	
Evidence		
Status Reasoning		
Action Required		Not assessed
35	The consent holder shall, by 30 September 2015 and every five years thereafter, submit to the Waikato Regional Council a Wastewater Treatment Review Report, the scope of which shall include: i) An analysis of the performance of the treatment system with respect to the initial plant design; ii) Identification of any deficiencies in the plant design or operation and the measures that are or have been undertaken to address these deficiencies and the anticipated (or actual) improvement in treated wastewater quality; iii) Timetable for the treatment plant capital upgrade to cater for actual population growth; iv) A review of the trend in the combined contribution made by the Ngaruawahia and Huntly wastewater treatment plant discharges to the total nitrogen and total phosphorus load in the Waikato River at Mercer Bridge since commencement of this consent.	
Evidence	A Wastewater Treatment Review Report was submitted to WRC in 2015. a second report was due in 2020 and submitted in November 2021.	
Status Reasoning		
Action Required		Low Risk Non-Compliance
36	The consent holder shall retain suitably qualified persons to review the findings outlined in Appendix 5 “Alternatives Study” of the AEE, recorded on Waikato Regional Council’s document system numbered 1458402, at intervals as below. The investigations shall include the feasibility, technology and economics of alternative collection, treatment and disposal systems for wastewater including land-based disposal options. The reviews shall be carried out in consultation with Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and Hopuhopu Manawhenua Roopu and the findings of the reviews shall be adopted by Waikato District Council for the proposed upgrade of the treatment system. The first review shall focus on alternative treatment options for removal of algae from the effluent after the pond systems and UV disinfection prior to the proposed rock-lined channel. The review shall include (but not be limited to) consideration of sand filter, Bio-Filtro and an algae treatment system that has been identified by Hopuhopu Manawhenua Roopu. This review shall be completed and reported to the Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 30 September 2011. The second review shall consider all aspects that are covered in Appendix 5 of the AEE and shall include (but not be limited to) consideration of Bio-Filtro and an algae treatment system that has been identified by Hopuhopu Manawhenua Roopu. The review shall be completed and reported to Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 31 March 2016. The third review shall cover the same matters and options as the second review and shall be completed and reported to Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 31 March 2022. Note: Commissioning of any treatment upgrade is subject to condition 13.	

Evidence	The third review shall cover the same matters and options as the second review and shall be completed and reported to Waikato Regional Council, Waikato-Tainui Te Kahurangi Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 31 March 2022. Note: Commissioning of any treatment upgrade is subject to condition 13.	
Status Reasoning		
Action Required	Report due by 31 March 2022	Not assessed
	Authorisation Compliance:	Moderate Non-Compliance

AUTH119643.01.01 - Air - odour

Activity Authorised: Discharge contaminants to air from activities associated with the Ngaruawahia WWTP

Condition No.	Description	
1	The discharge to air shall be undertaken in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below, which shall prevail should any inconsistency occur between the conditions and the above documents.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
2	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
3	The consent holder shall pay to the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act 1991, or any charge prescribed in accordance with regulations made under section 360 of the Resource Management Act.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
4	The operation, management and maintenance of the Ngaruawahia Wastewater Treatment Plant shall not result in any objectionable odours at or beyond the boundary of the properties on which the treatment plant is located.	
Evidence	No complaints or reports of any objectionable odours at or beyond the boundary of the properties during this compliance period	
Status Reasoning		

Action Required		Full Compliance
5	There shall be no discharge of airborne contaminants as a result of the activities authorised by this resource consent to the extent that it causes an adverse effect at or beyond the boundary of the subject property on which the treatment plant is located. Note: For the purpose of this consent, the Waikato Regional Council will use the guidelines for assessment in chapter 6.4 of the Waikato Regional Plan to determine whether adverse effects are occurring from the discharge of odour or particulate matter.	
Evidence	No complaints or reports of any airborne contaminants at or beyond the boundary of the properties during this compliance period	
Status Reasoning		
Action Required		Full Compliance
6	The consent holder shall prepare an Odour Management Plan. This Plan shall be prepared by a suitably qualified and experienced person and shall detail the methods and operational procedures adopted by the consent holder to ensure compliance with the conditions of this consent. The Plan may form part of the Operations and Management Plan specified in consent 119642. As a minimum the Odour Management Plan shall address the following matters: i) A description of the entire wastewater treatment facility; ii) A description of routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation and compliance with consent conditions; iii) Details of operational and maintenance procedures to minimise odour release from the inlet screen; iv) Details of operational and maintenance procedures to minimise odour release from the oxidation pond; v) Details of operational and maintenance procedures to minimise odour release during pond desludging and pond sludge drying and handling; vi) Details of contingency plans and procedures to address power or equipment failure at the treatment plant; vii) Details of the odour complaints procedure, record keeping and response procedure. This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so. Note: The Waikato Regional Council reserves the right to make comment on the Operations and Management Plan submitted and any subsequent changes to the Plan.	
Evidence	<p>i) A description of the entire wastewater treatment facility; compliant</p> <p>ii) A description of routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation and compliance with consent conditions; compliant</p> <p>iii) Details of operational and maintenance procedures to minimise odour release from the inlet screen; Partial compliance as no specific procedures to minimise odours are mentioned. Sniff tests are required when the site is visited.</p> <p>iv) Details of operational and maintenance procedures to minimise odour release from the oxidation pond; Partial compliance - no specific measures relating to the oxidation pond are included</p> <p>v) Details of operational and maintenance procedures to minimise odour release during pond desludging and pond sludge drying and handling; Non-compliant - no mention of odours relating to sludge drying and handling.</p> <p>vi) Details of contingency plans and procedures to address power or equipment failure at the treatment plant; Non-compliant - no specific contingencies mentioned relating to power or equipment failure and odours.</p> <p>vii) Details of the odour complaints procedure, record keeping and response procedure. Partial compliance - some information pertaining to the odour complaints procedure is included</p> <p>This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so.</p>	
Status Reasoning	There is limited information in the O&M Plan relating to many aspects of the condition that are required	
Action Required	Please review the O&M plan and ensure that requirements in the conditions are covered in the plan.	Low Risk Non-Compliance

7	In conjunction with consent 119642, the consent holder shall maintain and keep a Complaints Register for all complaints made about the treatment and discharge operations received by the consent holder. The Register shall record: i) The date, time and duration of the event/incident that has resulted in the complaint; ii) The location of the complainant when the event/incident was detected; iii) The possible cause of the incident; iv) The weather conditions and wind direction at the site when the incident allegedly occurred, if significant to the complaint; v) Any corrective action undertaken by the consent holder in response to the complaint. The Register shall be made available to the Waikato Regional Council at all reasonable times. Complaints which may indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 working days of the complaint being received.	
Evidence	WDC operates a CRM complaints system	
Status Reasoning		
Action Required		Full Compliance
8	The consent holder shall notify the Waikato Regional Council of any incident, including power, mechanical or process failure, leading to a significant emission of odour from the plant, within 24 hours of the incident being brought to the attention of the consent holder, or the next working day. A written report shall be forwarded to the Waikato Regional Council within seven working days of the event occurring describing the incident, the reasons for it occurring, its consequences (including the nature of any complaints), the measures taken to remedy or mitigate its effects, and any measures taken to prevent a recurrence of the event, including any changes proposed to the Odour Management Plan.	
Evidence	WDC/WSL notifies WRC as required of any incidents	
Status Reasoning		
Action Required		Full Compliance
	Authorisation Compliance:	Low Risk Non-Compliance

AUTH119644.01.01 - Land - sewage

Activity Authorised: Discharge treated municipal wastewater sludge onto land during pond de-sludging from activities associated with the Ngaruawahia WWTP

Condition No.	Description
1	The sludge removal and treatment operation shall be undertaken in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below which shall prevail should any inconsistency occur between the conditions and the above documents.
Evidence	
Status Reasoning	
Action Required	Full Compliance
2	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.
Evidence	

Status Reasoning		
Action Required		Full Compliance
4	At the beginning of each programme of sludge removal from the oxidation pond or holding pond, the consent holder shall inform the Waikato Regional Council in writing, at least 10 working days prior to commencement of each event, of the start date of the works authorised by this resource consent.	
Evidence	No sludge disposal operations have been undertaken during this compliance period	
Status Reasoning		
Action Required		Not assessed
	Authorisation Compliance:	Full Compliance

AUTH119645.01.01 - Bed - structure

Activity Authorised: Use, upgrade and maintain an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Ngaruawahia WWTP

Condition No.	Description	
1	The outfall structure shall be maintained and operated in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below, which shall prevail should any inconsistency occur between the conditions and the above documents.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
2	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
4	The discharge of treated wastewater to the Waikato River shall be via a multi-port diffuser located on the bed of the Waikato River.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
5	Ports 2, 4, 6 and 8 of the diffuser, as numbered from the true right bank of the Waikato River, shall remain closed unless specifically permitted in writing by the Waikato Regional Council.	

Evidence	<p>see dive survey from March 2021 (doc ref 20203770)</p> <p>5 diffusers were found, and the following observations made: Diffuser 1: 150mm clearance above riverbed; flow observed. Diffuser 2: 150mm clearance above riverbed; no flow observed. Diffuser 3: Just clear of riverbed; flow observed. Diffuser 4: 150mm clear of riverbed; flow observed. Diffuser 5: Just clear of riverbed; no flow observed. No damage or debris was found, and the warning sign was clearly visible from the river</p>	
Status Reasoning	<p>Unable to assess compliance as the dive survey failed to account for all the ports and did not reference the ones that were found as to their location from the bank etc.</p> <p>only 3 ports were found to be flowing of the 5 located.</p>	
Action Required	Please ensure dive company provides the relevant information as per the consent condition requirements	Low Risk Non-Compliance
6	The consent holder shall maintain the outfall diffuser in an operational state such that the discharge from ports 1, 3, 5, 7 and 9 is uniform along the operational length of the diffuser and providing effective dispersion of the wastewater in the river flow.	
Evidence	<p>No damage or debris was found. The screen was cleaned and photos captured. What appears to be a soft patch over a small hole in the pipeline was found partially detached. No warning sign was found</p> <p>Only 3 ports were found to be flowing of the 5 located. Please ensure that 4 ports are operational</p>	
Status Reasoning	25% of the required discharge ports are not visibly functioning, thus reducing the level of diffusion required. No warning sign visible. a patched hole was losing its protective covering.	
Action Required	Ensure that 4 ports of the diffuser are operational as a minimum, install a warning sign on the bank that is visible to river users.	Full Compliance
7	The consent holder shall undertake a survey of the diffuser at six monthly intervals to demonstrate compliance with conditions 5 and 6 of this consent. The frequency of the surveys may be reduced to no less than every two years following written request to and approval from the Waikato Regional Council. The results of each survey and any recommendation as to the frequency of future surveys shall be provided to the Waikato Regional Council within 30 days of the survey.	
Evidence	this has been reduced to annually by mutual agreement	
Status Reasoning		
Action Required		Full Compliance
8	The consent holder shall notify the Waikato Regional Council in writing at least five working days prior to commencement of survey works.	
Evidence		
Status Reasoning		
Action Required		Not assessed
9	The consent holder shall be responsible for the structural integrity and maintenance of the outfall structure and for the provision and maintenance of any erosion control works that become necessary to preserve the structural integrity of the outfall, and/or to control erosion as a result of exercise of this consent. Any such works shall be to the satisfaction of the Waikato Regional Council. Note: A separate resource consent may be required as a result of the need to undertake erosion control works. Any such consent shall be obtained by the consent holder at their sole expense prior to any works being undertaken.	
Evidence		
Status Reasoning		

Action Required		Not assessed
10	Any and all earthmoving machinery, pumps and generators associated with use and maintenance shall be operated in a manner which ensures that spillages of fuel, oil and similar contaminants are prevented, particularly during refueling and machinery servicing and maintenance. Refueling and lubrication activities shall be carried out away from any surface water such that any spillage can be contained and does not enter any surface water or unsealed ground.	
Evidence		
Status Reasoning		
Action Required		Not assessed
11	The consent holder shall maintain the structure so that no part of the structure is lost (e.g. breaks loose due to water) or results in a navigational hazard. Any material that is lost from the structure shall be immediately retrieved by the consent holder. Should the material lost be a hazard to navigation the Waikato Regional Council shall be informed immediately.	
Evidence		
Status Reasoning		
Action Required		Not assessed
	Authorisation Compliance:	Low Risk Non-Compliance

AUTH119646.01.01 - Water - sewage

Activity Authorised: Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Ngaruawahia WWTP

Condition No.	Description	
1	The discharge shall be undertaken in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below, which shall prevail should any inconsistency occur between the conditions and the above documents.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
4	The consent holder shall manage and maintain the integrity of all ponds, wetlands, rock filters and other structures that form any part of the wastewater treatment process so as to minimise the volume of seepage from such structures so far as practicable.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
	Authorisation Compliance:	Full Compliance

AUTH124828.01.01 - Land - solid waste		
Activity Authorised: To discharge biosolids to land		
Condition No.	Description	
1	The discharge of sewage sludge to land shall be undertaken in general accordance with: i) The application for this resource consent; ii) The document titled "Ngaruawahia Biosolids Disposal Consenting Project, Resource Consent Application: Assessment of Effects on the Environment" dated June 2012 and recorded on Waikato Regional Council's document system numbered 2209397 and iii) The document titled "Section 92 request for resource consent application for the disposal of biosolids to land", dated 25 June 2012 and recorded on Waikato Regional Council's document system numbered 2211843; iv) Technical Note dated 26 September 2012 from applicants consultant Garret Hall of MWH following meeting to discuss issues relating to biosolids disposal rates and recorded on Waikato Regional Council's document system numbered 2271841	
Evidence	No sludge discharge has occurred during this compliance period	
Status Reasoning		
Action Required		Full Compliance
	Authorisation Compliance:	Not assessed

4 SUMMARY OF COMPLIANCE

Based on the conditions selected for monitoring, compliance has been assessed as:

Authorisation	Authorisation Description	Compliance Status
AUTH119642.01.02	Discharge up to 11,200 cubic metres per day of treated wastewater from the Ngaruawahia WWTP into the Waikato River	Moderate Non-Compliance
AUTH119643.01.01	Discharge contaminants to air from activities associated with the Ngaruawahia WWTP	Low Risk Non-Compliance
AUTH119644.01.01	Discharge treated municipal wastewater sludge onto land during pond de-sludging from activities associated with the Ngaruawahia WWTP	Full Compliance
AUTH119645.01.01	Use, upgrade and maintain an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Ngaruawahia WWTP	Low Risk Non-Compliance
AUTH119646.01.01	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Ngaruawahia WWTP	Full Compliance
AUTH124828.01.01	To discharge biosolids to land	Not assessed

Overall Site Compliance:

Moderate Non-Compliance

5 DISCUSSION AND CONCLUSIONS

The performance of the Ngaruawahia WWTP has been deteriorating over time and this has probably been due to the build up of sludge within the main pond and issues in operating the actiflo system. The site is currently having the pond desludged and some improvement is expected after that process has been completed. Unfortunately, the performance of the treatment system has triggered the consent limits that require an upgrade solution. The determinants in question are ammoniacal nitrogen and total nitrogen. The consent holders annual report states:

“The exceedances were sufficient to meet the TN and ammoniacal nitrogen Trigger Levels detailed in Condition 10 and Condition 11 of the Resource Consent. The outcome of meeting the Trigger Levels is that the consent holder must endeavour to carry out upgrades that will bring the measurements of interest (TN and ammoniacal nitrogen) down to 80% of the compliance values. Pond desludging has been scheduled to satisfy this requirement (Q4 2021).”

Condition 11 of the consent states:

The consent holder is required to design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. the trigger level was reached by 30 June 2021. therefore, the date for the upgrade to be commissioned by 1 July 2023.

Therefore, we should expect to see full compliance achieved for these two determinants by July 2023.

The Operations and Maintenance manual was last reviewed and updated in 2014, and a review is well over due to ensure the O&M manual matches the actual processes and equipment currently on site.

The dive survey undertaken annually needs to ensure that the information required for assessment in the conditions is adequately reported on in the survey report. The diffuser ports need to be identified and a reference given as to which end of the diffuser the comments and photos are taken from.

6 SUMMARY OF ACTIONS REQUIRED

Resource consent	Condition	Action Required
AUTH119642.01.02	10	The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached which was 30 June 2021. That date for an upgrade is 1 July 2023 and a plan for the upgrade to the plant should be submitted to WRC as soon as possible.
AUTH119642.01.02	11	The consent holder is required to design, build and commission the appropriate upgrade to the treatment process within two years after the

		"trigger" level is reached. the trigger level was reached by 30 June 2021. therefore the date for the upgrade to be commissioned by 1 July 2023.
AUTH119642.01.02	20	Please review and update the O&M plan to ensure the plan is relevant and matches the current site layout and processes that exist on site. Don't forget to update the contact details.
AUTH119642.01.02	24	Please ensure that WDC/WSL places and maintains a sign in the vicinity of the discharge to the Waikato River, in such a way that it is conspicuous to river users, advertising of the presence of the wastewater discharge and warning against the use of the location for swimming
AUTH119642.01.02	36	Report due by 31 March 2022
AUTH119643.01.01	6	Please review the O&M plan and ensure that requirements in the conditions are covered in the plan.
AUTH119645.01.01	5	Please ensure dive company provides the relevant information as per the consent condition requirements
AUTH119645.01.01	6	Ensure that 4 ports of the diffuser are operational as a minimum, install a warning sign on the bank that is visible to river users.

The following actions are required to be undertaken:

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

I recommend the following actions for Ngaruawahia WWTP for the period 1 July 2020 to 30 June 2021:

- Issue a **Formal Warning** for the non-compliances attained during the compliance period.
- Issue a **Letter of Direction** requiring a response as to how they intend to improve compliance following the trigger limits being reached.
- The site to remain as a Focus Area 1 site due to the previous non-compliances and be audited again for the 2021-22 compliance period.



Edward Prince
Senior Resource Officer - Infrastructure
Resource Use

Date: 26 January 2022

7.1 Decision

I have reviewed this audit report and agree with the recommendations.

A handwritten signature in dark ink, appearing to read 'H. Keane', is centered within a light gray rectangular box.

Hugh Keane
**Team Leader - Infrastructure
Resource Use**

Date: 26 January 2022

APPENDIX 1**Compliance Rating System**

Compliance Status	Compliance Grade
	Not Assessed
	Full Compliance Full compliance with all relevant consent conditions, plan rules, regulations and national environmental standards.
	Low Risk Non-Compliance Non-compliance with some of the relevant consent conditions, plan rules, regulations and national environmental standards. Non-compliance carries a low risk of adverse environmental effects or is technical in nature (e.g. failure to submit a monitoring report).
	Moderate Non-Compliance Non-compliance with most of the relevant consent conditions, plan rules, regulations and national environmental standards, where there are some environmental consequences and/or there is a moderate risk of adverse environmental effects.
	Significant Non-Compliance Non-compliance with many of the relevant consent conditions, plan rules, regulations and national environmental standards, where there are significant environmental consequences and/or a high risk of adverse environmental effects.