

Site Compliance Report

Site No: REG606683
Site Owner: Waikato District Council
Site Name: Raglan WWTP: Wainui Rd, Raglan
Date: 5 November 2019

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH971389.01.01	Current	Undertake soil disturbance activities within a high risk erosion area in association with the construction and modifications of the Raglan wastewater treatment site	14/02/2005	14/02/2020
AUTH971390.01.01	Current	Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	14/02/2005	14/02/2020
AUTH971391.01.01	Current	Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour	14/02/2005	14/02/2020
AUTH971392.01.01	Current	Discharge odour to the air associated with all aspects of the existing & proposed treatment system	14/02/2005	14/02/2020

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

2 BACKGROUND

The following excerpt is from the submitted annual report from Waikato District Council:

The Waikato District Council (WDC) holds the above resource consent associated with the treatment and discharge of wastewater from the Raglan wastewater treatment plant (WWTP) to the Raglan Harbour. The consent was issued on February 2005 and has an expiry date of February 2020.

The conditions issued by Waikato Regional Council include the following:

971390 To discharge up to 2,600m³ per day of treated wastewater from the plant after treatment subject to a number of conditions.

The average daily discharge of treated effluent was 957 m³ over the reporting period.

During the 2018-2019 monitoring period, median consent conditions were achieved for bacteriological treatment and cBOD₅.

CH2MBeca, along with sub-consultant The Wastewater Specialists, have undertaken a review of the operation and maintenance of Waikato District Council's Wastewater Treatment Plants (WWTPs). This

report discusses the current operational roles, how data is collected and monitored, and summarises the works completed over this reporting period (if any).

Waikato District Council (WDC) have entered into a commercial agreement where Watercare Services Ltd (WSL) this will see WSL providing all Councils waters management services to WDC under the guidance of a Waters Governance Board (WGB). This contract will be effective from 1 October 2019.

WSL will begin the process to review and get an understanding of the wastewater plants but will continue planned or reactive works as identified in the current Council Long Term Plan 2018-2028 any new initiatives or changes will be limited to budgets and works already identified for the next 21 months.

OPERATIONAL COMMENTS

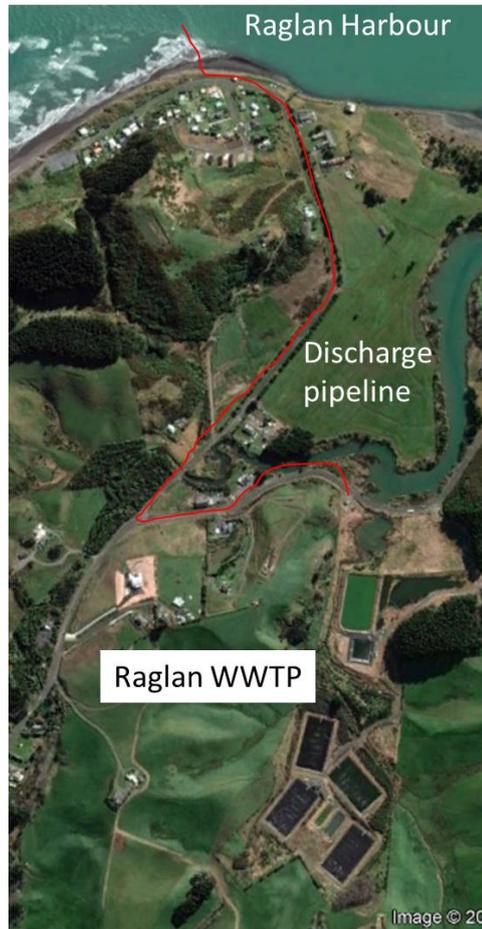
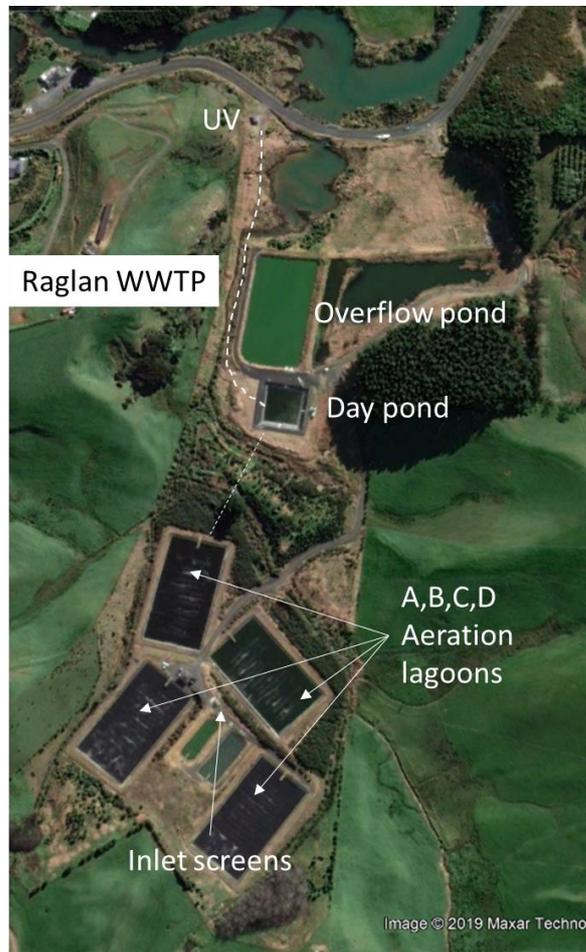
Septage Receiver: Not in service.

Staff Maintenance Visits: Site visits are carried out twice weekly.

Please see Appendix Three – Upgrades and wetlands renewal per CH2MBeca compliance investigations.

Under WSL levels of service will be maintained as agreed but it may offer an opportunity to raise levels of service in the future.





2.1 PREVIOUS COMPLIANCE HISTORY

Date Period	Compliance status
1 July 2018 to 30 June 2019	High level of compliance
1 July 2017 to 30 June 2018	High level of compliance
1 July 2016 to 30 June 2017	Partial compliance
1 July 2015 to 30 June 2016	High level of compliance
1 July 2014 to 30 June 2015	Partial compliance
1 July 2013 to 30 June 2014	High level of compliance
1 July 2012 to 30 June 2013	High level of compliance
1 July 2011 to 30 June 2012	High level of compliance

3 COMPLIANCE ASSESSMENT

Unless otherwise specified in this document this assessment covers the period from **1 July 2018 to 30 June 2019**.

This compliance assessment has been undertaken based on the submitted annual report by the consent holder, monitoring data supplied throughout the compliance period and site inspections. 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.

AUTH971390.01.01 - Water - sewage

Activity Authorised: Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	
Condition No.	Description
1	The Raglan wastewater treatment and disposal system shall be constructed, operated and maintained in general accordance with the documents titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 –Report", "Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information" dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environmental Effects" dated October 2002, or inconsistent with the resource consent conditions below, which shall prevail. This condition shall preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.
Evidence	
Status Reasoning	
Action Required	Full compliance
2	Suitable fencing shall be installed and maintained to ensure that livestock are at all times unable to access the wastewater treatment site.
Evidence	
Status Reasoning	
Action Required	Full compliance
3	The consent holder shall construct the Raglan wastewater treatment system in accordance with accepted civil engineering practices. To this end the consent holder shall, unless otherwise required by Waikato Regional Council in writing following consultation with the consent holder, retain a suitably qualified registered engineer to: (i) supervise the construction of the Raglan wastewater treatment

	<p>system; (ii) ensure that the filter treatment system, facultative, maturation and holding ponds, and UV disinfection unit are constructed to a standard appropriate for their anticipated use, and to an adequate standard to withstand peak loading conditions, and to withstand earthquake events, in accordance with accepted engineering design requirements; and (iii) within 2 months following construction of the Raglan wastewater treatment system, to provide a written report to the Waikato Regional Council detailing the construction procedures used and the “as-built” details of works associated with the exercise of this consent. The report shall demonstrate that the works have been carried out in accordance with accepted civil engineering practice and are such as to meet the conditions of this consent.</p>
Evidence	
Status Reasoning	
Action Required	Full compliance
4	<p>The consent holder shall provide the Waikato Regional Council with a management plan which details the procedures that will be implemented to operate in accordance with the conditions of this resource consent and the procedures that will be put into place to avoid the potential for adverse effects on the Raglan Harbour. This plan shall be lodged with the Waikato Regional Council for its approval within 12 months of date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. The plan shall as a minimum include the following: (i) a description of the entire treatment system facility including: - the filter treatment system, facultative, maturation and holding ponds, and ultra-violet (UV) disinfection unit; - discharge pumps, - discharge pump activation/deactivation and monitoring systems, including a backup system to ensure failsafe operation of the discharge pumps on the outgoing tide, and - discharge and outfall pipeline. (ii) a description of routine maintenance procedures to be undertaken; (iii) an outline of the methods to be utilised to monitor the treatment plant in an operational sense including: - monitoring of influent waste water - monitoring of treatment performance (iv) specific management procedures for operation of the wastewater treatment system, discharge and outfall pipeline; (v) procedures for recording routine maintenance and all repairs that are undertaken; (vi) contingency measures in place to deal with unusual events; (vii) other actions necessary to comply with the requirements of this resource consent; (viii) procedures for improving and/or reviewing the management plan. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft management plan presented and explained to it and shall take into consideration any comments made by the Tainui Hapu prior to lodgement of the management plan with the Waikato Regional Council for approval. The consent holder shall on submitting the management plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council’s consideration. The management plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved management plan.</p>
Evidence	<p>A Management and Contingency Plan was last submitted to WRC in August 2014 (see doc ref 3417453)</p> <p>The consent holder states in the submitted annual report that:</p> <p><i>WSL will begin the process to review plans from 1 October 2019 as mentioned in the introduction.</i></p>
Status Reasoning	<p>The Management and Contingency Plan is required to be reviewed annually. No review has been undertaken since 2014. The site infrastructure has changed significantly since 2014 and it is likely the Management and Contingency Plan is out of date and likely to be due for a review to reflect the current state of operations at the plant.</p>
Action Required	<p>Please review and submit a new and updated version of the site Management and Contingency Plan for the Raglan WWTP.</p> <p>Minor technical non-compliance</p>
6	<p>The consent holder shall provide the Waikato Regional Council with a contingency plan that assesses the environmental hazards associated with potential discharge of wastewater from the wastewater treatment site and marine outfall. This plan shall be lodged with the Waikato Regional Council for its approval within 3 months of date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. The hazard analysis shall include contingency plans to avoid discharges to the unnamed waterways on the treatment site and unauthorised discharges to the Raglan Harbour. The hazard analysis shall include consideration of the following events: (i) overtopping of one or more ponds; (ii) structural failure of one or more ponds; (iii) Datran system failure; The analysis shall</p>

	include measures undertaken to effectively avoid the risk of a spill and measures available to reduce the impact of a spill, should one occur. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft contingency plan presented and explained to it and shall take into consideration any comments made by the Tainui Hapu prior to lodgement of the contingency plan with the Waikato Regional Council for approval. The consent holder shall on submitting the contingency plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council's consideration. The contingency plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved contingency plan.
Evidence	Contingency Plan has been incorporated into the site Management Plan. The consent holder states in the submitted annual report that: <i>WSL will begin the process to review plans from 1 October 2019 as mentioned in the introduction.</i>
Status Reasoning	The Contingency Plan is required to be reviewed annually. No review has been undertaken since 2014. The site infrastructure has changed significantly since 2014 and it is likely the Contingency Plan is out of date and likely to be due for a review to reflect the current state of operations at the plant.
Action Required	Please review and submit a new and updated version of the site Contingency Plan for the Raglan WWTP. Minor technical non-compliance
7	The consent holder shall keep a complaints register for all complaints regarding all aspects of operations (with the exception of odour which is the subject of a separate resource consent) at the wastewater treatment facility received by the consent holder. The register shall record: (i) the date, time and duration of the event/incident that has resulted in a complaint; (ii) The nature of the event/incident complained of; (iii) the location of the complainant when the event/incident was detected; (iv) the possible cause of the event/incident; and (v) any corrective action undertaken by the consent holder in response to the complaint. The register shall be available to the Waikato Regional Council at all reasonable times upon request. Complaints received by the consent holder which indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 days of the complaint being received.
Evidence	Council's CRM database records all complaints from the public please see Appendix Two of annual report.
Status Reasoning	
Action Required	Full compliance
8	Until the fifth anniversary of the date of commencement of this consent as defined in section 116 of the Resource Management Act 1991, the maximum volume of treated wastewater discharged shall not exceed 2,600 cubic metres in any 24 hour period.
Evidence	See annual report submitted by WDC (doc ref 15248903) Discharge volumes from the Raglan WWTP did not exceed the consented volume. The maximum daily flow was 2428m ³ /day
Status Reasoning	
Action Required	Full compliance
9	A water flow meter shall be installed to record the quantity of treated wastewater discharged on a cumulative basis per tidal period. The meter shall be calibrated to ensure measurement of treated wastewater flow is maintained to an accuracy of +/- 2%. Access to the meter shall be provided to Waikato Regional Council staff at all reasonable times. The flow meter display panel shall be visible to the public.

Evidence	<p>A meter is installed to record quantities of effluent discharged. A flow display panel visible to the public is installed on the roadside wall of the UV building.</p> <p>The meter was last calibrated in 2014 (see doc ref 3155995)</p>	
Status Reasoning	<p>It is recommended that meters used to measure volumes associated with a compliance condition of a consent are calibrated every 5 years. This meter requires a new calibration certificate from May 2019.</p>	
Action Required	<p>Please provide WRC with a calibration certificate for the meter/s used to assess compliance that is less than 5 years old and shows the meter to be within an accuracy of +/-5%</p>	<p>Minor technical non-compliance</p>
10	<p>The consent holder shall maintain a record of the daily volume of treated wastewater discharged from the treatment system which shall be made available to the Waikato Regional Council at all reasonable times and these records shall be forwarded to the Waikato Regional Council on a three monthly basis.</p>	
Evidence	<p>WaterOutlook reporting at Council has allowed this process to be automated. Monthly reports of daily volumes discharged are submitted to WRC monthly</p>	
Status Reasoning		
Action Required		<p>Full compliance</p>
11	<p>The discharge of treated wastewater shall occur for a maximum of 5.5 hours per outgoing tide. The discharge may commence no earlier to 0.5 hours before high tide and shall cease no later than 1 hour before low tide. Provided that for not more than 20 days per year immediately after extreme weather, pumping hours may exceed that maximum discharge duration of 5.5 hours per tide.</p>	
Evidence	<p>The treatment team have automated the system so that the pumps logic is set using an algorithm dictated by the NIWA tide charts. The accuracy of the automated pump settings are checked periodically.</p>	
Status Reasoning		
Action Required		<p>Full compliance</p>
12	<p>The consent holder shall maintain a record of the date and time each discharge cycle commences and finishes which shall be made available to the Waikato Regional Council upon request and these records shall be forwarded to the Waikato Regional Council on a three monthly basis.</p>	
Evidence	<p>This data is recorded in the SCADA system.</p>	
Status Reasoning	<p>WRC has received a few complaints relating to early discharge times and therefore it is requested that WDC provides evidence of timings for the period 1 July 2018 to 30 June 2019 so that these timings can be confirmed.</p>	
Action Required	<p>Please submit a record of the dates and times for the period 1 July 2018 to 30 June 2019 of the discharge cycles commence and finish so that its accuracy can be confirmed.</p>	<p>Full compliance</p>
13	<p>There shall be no discharge of oil or grease or persistent surface foam as a result of the exercise of this consent.</p>	
Evidence	<p>There have been no complaints relating to this activity received by Waikato Regional Council during this compliance period.</p>	
Status Reasoning		
Action Required		<p>Full compliance</p>
14	<p>The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the suspended solids level does not exceed a median level of 20 grams per cubic metres for 12</p>	

	<p>consecutive monthly samples (one sample per month) an a maximum of 30 grams per cubic metre for 9 of 10 consecutive monthly samples (one sample per month). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.</p>																				
Evidence	<p>SSlds median limit = 20g/m3 results = 37.3g/m3 Non-compliant.</p> <p>SSlds 90%ile limt = 30g/m3 results = 58.8g/m3 Non-compliant</p> <div style="text-align: center;"> <table border="1"> <caption>TSS Data Points</caption> <thead> <tr> <th>Month</th> <th>TSS (g/m3)</th> </tr> </thead> <tbody> <tr><td>May</td><td>92</td></tr> <tr><td>July</td><td>37</td></tr> <tr><td>September</td><td>33</td></tr> <tr><td>October</td><td>31</td></tr> <tr><td>December</td><td>32</td></tr> <tr><td>February</td><td>38</td></tr> <tr><td>March</td><td>49</td></tr> <tr><td>May</td><td>54</td></tr> <tr><td>July</td><td>46</td></tr> </tbody> </table> </div>	Month	TSS (g/m3)	May	92	July	37	September	33	October	31	December	32	February	38	March	49	May	54	July	46
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May	92																				
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July	46																				
Status Reasoning	<p>This site has been non-compliant with the suspended solids limit for several years now. This is despite trying various options for solids removal. The consent holder has now stated that it will be installing a tertiary filtration membrane system to reduce the suspended solids levels in the discharge.</p>																				
Action Required	<p>Please provide an update with timeframes for the installation of the membrane plant. Low priority non-compliance</p>																				
15	<p>The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the 5-day biochemical oxygen demand (BOD5) concentration of the discharge does not exceed a median level of 10 grams per cubic metre of 12 consecutive monthly samples (one sample per month) and a maximum of 20 grams per cubic metre for 9 of 10 consecutive monthly samples (one sample per months). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.</p>																				
Evidence	<p>cBOD5 median limit = 10g/m³ results = 8.2g/m³ Compliant</p> <p>cBOD5 90%ile limit = 20g/m³ results = 13.0g/m³ Compliant</p>																				
Status Reasoning																					
Action Required	<p style="text-align: right;">Full compliance</p>																				
16	<p>The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the concentration of faecal coliforms in the discharge does not exceed a median level of 14 (number per 100 millilitres) for 12 consecutive monthly samples (one sample per month) and a maximum of 43 (number per 100 millilitres) for 9 of 10 consecutive samples (one sample per month).</p>																				

	Upon completion of the treatment system the point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. Notwithstanding the time given for compliance, the consent holder shall make all reasonable and practical efforts to ensure that final effluent quality is maximised within the capabilities of the current treatment system. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.
Evidence	E.coli median limit = 14 cfu/100ml results = 5.0 cfu/100ml Compliant E.coli 90%ile limit = 43 cfu/100ml results = 35.cfu/100ml Compliant
Status Reasoning	
Action Required	Full compliance
17	The consent holder shall monitor the concentration of enterococci in the discharge at weekly intervals from 15 December to 30 January. The consent holder shall ensure that, no later than 2 years after the date of commencement of this consent, the concentration of enterococci in the discharge is less than 35 enterococci per 100 millilitres of 5 of 6 consecutive weekly samples (one sample per week). The point of compliance with the specified limit shall be at or about the point that the treated effluent enters the discharge pipeline. All sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods for The Examination of Water and Wastewater, 1999" 20th edition by A.P.H.A. and A.W.W.A. and W.P.C.F.
Evidence	Enterococci 90%ile limit = 35 cfu/100ml results = 30 cfu/100ml Compliant Enterococci median results = 5 cfu/100ml
Status Reasoning	
Action Required	Full compliance
18	The consent holder shall provide to the Waikato Regional Council a written monitoring report by 30 September each year for the previous year ending 30 June of each year that this consent is current. As a minimum this report shall include the following: (i) a comparison of data with previously collected data identifying any emerging trends in effluent quality in terms of suspend solids, five-day biochemical oxygen demand, faecal coliforms and enterococci (reference conditions 14,15, 16 and 17); (ii) comment on compliance with conditions 8,9,10,11,12,13,14,15,16 and 17 of this resource consent; (iii) any reasons for non-compliance or difficulties in achieving compliance with conditions 8,9,10,11,12,13,14,15,16, and 17 of this resource consent; (iv) any works that have been undertaken to improve the environmental performance of the wastewater treatment system or that are proposed to be undertaken in the up-coming year to improve the environmental performance of the wastewater treatment system; and (v) recommendations on alterations to the monitoring required by conditions 14,15,16 and 17 of this resource consent.
Evidence	The consent holder has submitted an annual report by 30 September 2019 (see doc ref 15280689).
Status Reasoning	
Action Required	Full compliance
19	The consent holder shall notify the Waikato Regional Council as soon as practicable and as a minimum requirement within 24 hours, of the consent holder becoming aware of the limits specified in conditions 8,11,14, 15, 16, and 17 of this resource consent being exceeded and/or of any accidental discharge, plant breakdown, or other circumstances which are likely to result in the limits of this resource consent being exceeded. The consent holder shall, within 7 days of the incident occurring, provide a written report to the Waikato Regional Council, identifying the exceedance, probable causes, steps undertaken to remedy the effects of the incident and measures that will be undertaken to ensure future compliance.
Evidence	WDC notifies WRC within the required timeframes of any notifiable incidents.
Status Reasoning	
Action Required	Full compliance

20	The consent holder shall maintain a register of all incidents that result in an exceedance of the limits specified in conditions 9,12,15,16,17 and 18 of this resource consent. This register shall be made available for inspection by Waikato Regional Council staff at all reasonable times. This register shall be forwarded to the Waikato Regional Council by 30 June each year.	
Evidence	Total suspended solids results exceeded both median and 90th percentile limits as presented above.	
Status Reasoning		
Action Required		Full compliance
21	The consent holder shall provide to the Waikato Regional Council, by the 5th anniversary of the granting of this consent, an Effects Assessment Report, that provides as a minimum: (i) A review of all monitoring results collected since this consent was granted; (ii) A discussion of the acceptability of the discharge to local Tainui Hapu; (iii) An assessment of the need to improve wastewater discharge quality and/or provide alternative disposal methods, based on the information provided in (i) and (ii) of this condition; (iv) A review of current developments in wastewater treatment and disposal technology that could be appropriate for Raglan wastewater treatment and disposal; (v) Recommendations for future action in the light of (i) to (iv) above. The Effects Assessment Report shall be prepared by a suitably qualified/experienced person(s) and shall be to a standard acceptable to the Waikato Regional Council.	
Evidence	The fifth anniversary was February 2010 and the report by AWT consultants was provided to Waikato Regional Council and other interested parties at this time.	
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance: High level of compliance		

AUTH971391.01.01 - Water - sewage

Activity Authorised: Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour		
Condition No.	Description	
1	The existing pipeline and outfall shall be operated and maintained in general accordance with the document titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 – Report", "Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information " dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environmental Effects" dated October 2002, or inconsistent with the resource consent conditions below, which shall prevail. The condition shall not preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.	
Evidence	The consent holder states in their annual report: <i>This structure is a relatively new piece of infrastructure and as expected there have been nil reports of any issues which would compromise the structural integrity of this pipeline.</i>	
Status Reasoning		
Action Required		Full compliance
2	The consent holder shall maintain the pipeline and outfall in a structurally safe condition at all times.	
Evidence	There have been no complaints relating to this activity received by Waikato Regional Council during this compliance period.	
Status Reasoning		

Action Required		Full compliance
3	The consent holder shall maintain the outfall pipeline so as to minimise potential for the loss of components due to water action. Should the outfall pipeline become damaged, and material lost constitute a hazard to navigation, the Maritime Safety Authority or such other appropriate body shall be immediately informed. Damage to the pipeline shall be reported to Waikato Regional Council immediately and repairs shall be undertaken as soon as practicable. Note: A Separate resource consent may be required as a result of the need to undertake works on the foreshore and/or harbour bed. Any such consent shall be obtained by the consent holder at its sole expense prior to any works being undertaken.	
Evidence	No damage has been sustained to the pipeline during this compliance period.	
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance: Full compliance		

AUTH971392.01.01 - Air - odour

Activity Authorised: Discharge odour to the air associated with all aspects of the existing & proposed treatment system		
Condition No.	Description	
1	The wastewater treatment system shall be operated and maintained in general accordance with the documents titled "Resource Consent Application and Assessment of Environmental Effects, Volume 1 – Report" Resource Consent Application and Assessment of Environmental Effects, Volume 2 – Report", and "Raglan Wastewater Treatment and Disposal System, Request for Further Information " dated 15 September 1998, unless superseded by the following document "Raglan Wastewater Treatment Upgrade Assessment of Environment Effects" dated October 2002, or consistent with the resource consent conditions below, which shall prevail. This condition shall not preclude the Council from modifying the design or layout of elements of the Raglan Wastewater Treatment and Disposal System to incorporate other treatment technologies which may prove beneficial for the treatment process or environmental outcomes, provided that it meets the conditions of this consent.	
Evidence		
Status Reasoning		
Action Required		Full compliance
2	There shall be no odour as a result of the activities authorised by this resource consent that causes an objectionable or offensive effect beyond the boundary of the site, being that land defined by: • Gazette Notice, 1974, page 2548 (Land taken for Sanitary Works situated in Block I, Karioi Survey District, described as part lot 1, DP 13913, and Part Rakaunui 1C2A2 Block); • Gazette Notice, 1999 page 3849 (Land acquired for Wastewater Treatment described as Part Lot 1, DP 13913 (part C.T/ 47C/740).	
Evidence	Council's CRM database records all complaints from the public.	
Status Reasoning		
Action Required		Full compliance
3	The consent holder shall maintain and keep a complaints register for all odour complaints in respect of the wastewater treatment facility received by the consent holder. The register shall record: (i) the date, time and duration of the event/incident that has resulted in a complaint; (ii) the location of the complainant when the event/incident was detected; (iii) the possible cause of the event/incident (iv) the weather conditions and wind direction at the site when the odour event allegedly occurred; (v) any corrective action undertaken by the consent holder in response to the complaint. The register shall be made immediately available to the Waikato Regional Council upon request. Any event/incident with the potential to cause emissions resulting in adverse effects on the environment shall be reported to the Waikato Regional Council as soon as practicable and in any event within 24 hours of the incident occurring.	

Evidence	Council's CRM database records all complaints from the public.	
Action Required		Full compliance
4	<p>The consent holder shall provide the Waikato Regional Council with a management plan which details the procedures that will be implemented to operate in accordance with the conditions of this resource consent and the procedures that will be put into place avoid the potential for the discharge of odours that cause an offensive and objectionable effect beyond the boundary of the Raglan Wastewater Treatment site. This plan shall be lodged with the Waikato Regional Council within 12 months of the date of commencement of the consent as defined in section 116 of the Resource Management Act 1991. (i) a description of the entire treatment system facility, including - the filter treatment system, facultative, maturation and holding ponds, and ultra-violet (UV) disinfection unit, - discharge pumps - discharge pump activation/deactivation and monitoring systems, including a backup system to ensure failsafe operation of the discharge pumps on the outgoing tide; and - discharge and outfall pipeline. (ii) a description of routine maintenance procedures to be undertaken; (iii) an outline of the methods to be utilised to monitor the treatment plant in an operational sense including; - monitoring of influent waste water; - monitoring of treatment performance (iv) specific management procedures for operation of the wastewater treatment system, discharge and outfall pipeline; (v) procedures for recording routine maintenance and all repairs that are undertaken; (vi) contingency measures in place to deal with unusual events; (vii) other actions necessary to comply with the requirements of this resource consent; (viii) procedures for improving and/or reviewing the management plan. The consent holder shall provide an opportunity to the Tainui Hapu to have the draft management plan presented and explained to it and shall consider any comments made by the Tainui Hapu prior to lodgement of the management plan with the Waikato Regional Council for approval. The consent holder shall on submitting the management plan for approval, provide the Waikato Regional Council with a commentary on the above discussions with Tainui Hapu for the Council's consideration. The management plan shall be reviewed and updated by the consent holder as a minimum at 1-year intervals. The consent holder shall provide opportunities to the Tainui Hapu to comment on any proposed changes to the plan. Any proposed changes to the plan shall be submitted in writing for approval by the Waikato Regional Council. The consent holder shall undertake the treatment and disposal of wastewater in accordance with the approved management plan.</p>	
Evidence	An updated Raglan WWTP Management Plan was submitted to WRC in September 2014.	
Action Required		Full compliance
Authorisation Compliance:		Full compliance

4 SUMMARY OF COMPLIANCE

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

Authorisation	Authorisation Description	Compliance Status
AUTH971389.01.01	Undertake soil disturbance activities within a high risk erosion area in association with the construction and modifications of the Raglan wastewater treatment site	Not assessed
AUTH971390.01.01	Discharge up to 2600 cubic metres of treated wastewater per day into the Raglan Harbour	High level of compliance
AUTH971391.01.01	Retain existing treated wastewater pipeline, to enable discharge of treated wastewater to Harbour	Full compliance
AUTH971392.01.01	Discharge odour to the air associated with all aspects of the existing & proposed treatment system	Full compliance

Overall Site Compliance: High level of compliance

5 DISCUSSION AND CONCLUSIONS

Suspended solids levels continue to be the most significant non-compliance issue at this site. The exceedances are not major however they are high enough to be non-compliant with the consents median and 90%ile limits. This issue has been ongoing for several years now and the significance of this continued non-compliance has raised this issue to a serious level. The consent holder has stated that a new membrane plant will be installed to treat suspended solids and reduce them to a compliant level. This has been delayed as the discharge consent for the plant is currently due for replacement and an application has been lodged. The new resource consent may include more stringent limits and the consent holder wants to ensure that any major capital outlay at this site is suitable to achieve any new compliance limits for the new discharge consent.

Likewise the sites combined Management and Contingency Plan is overdue for review however there is some merit in waiting for the new replacement consent to be determined prior to expending time and resource on compiling a new or reviewed management plan prior to any requirements set by a new discharge consent. The new management plan will include any new equipment or processes needed to achieve compliance with the replacement consent.

The meter used for the recording of discharge volumes is due for its 5 yearly calibration (unless this has already been done). The meter is required to read accurately to within +/- 5% and should be done every 5 years to ensure the numbers being reported are accurate within that range.

Waikato Regional Council is also requesting a copy of the dates and times for the discharge cycles for the current compliance period. It is useful to assess the times of discharge occasionally to ensure they are correctly synchronised with the expected tide tables and times.

The final issue relates to the installation of the membrane plant and Waikato Regional Council is requesting an update as to when this technology will be installed.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition Number	Action Required
AUTH971390.01.01	4	Please review and submit a new and updated version of the site Management and Contingency Plan for the Raglan WWTP.
AUTH971390.01.01	6	Please review and submit a new and updated version of the site Contingency Plan for the Raglan WWTP.
AUTH971390.01.01	9	Please provide WRC with a calibration certificate for the meter/s used to assess compliance that is less than 5 years old and shows the meter to be within an accuracy of +/-5%
AUTH971390.01.01	12	Please submit a record of the dates and times for the period 1 July 2018 to 30 June 2019 of the discharge cycles commence and finish so that its accuracy can be confirmed.
AUTH971390.01.01	14	Please provide an update with timeframes for the installation of the membrane plant.

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

I recommend that this site retains its high priority for monitoring and reporting due to its operation which results in treated wastewater discharging to the entrance of Whaingaroa Harbour.



Edward Prince
**Senior Resource Officer - Infrastructure
Resource Use**

Date: 6 November 2019

7.1 Decision

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



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

Date: 15 November 2019

APPENDIX 1	
Compliance Status for Individual Conditions	
Compliance Status	Description
Not assessed	Monitoring of this condition was not undertaken during this monitoring event
High priority non-compliance	The non-compliance has the potential for, or has resulted in, significant adverse effects on the environment.
Medium priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a greater than minor increase in the level of effects authorised.
Low priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a less than minor increase in the level of effects authorised; and/or There has been a significant technical non-compliance such as a failure to collect or supply self-monitoring data.
Minor technical non-compliance	There is non-compliance with a condition, or part of a condition, that does not directly control adverse effects; and The non-compliance was not significant in the management of effects. For example a short delay in supplying data or meeting a deadline for a report
Full Compliance	The condition has been complied with
Compliance status for individual consents and the entire site	
Compliance Status	Description
Not assessed	Monitoring has not been undertaken at this site during the current financial year
Significant non-compliance	There has been a high priority non-compliance; and/or There have been several medium priority non-compliances.
Partial compliance	There has been a medium priority non-compliance; and/or There have been several low priority non-compliances.
High level of compliance	There has been a low priority non-compliance; and/or There have been several minor technical non-compliances.
Full compliance	All conditions that include limits or other direct controls on adverse effects have been complied with. A small number of minor technical non-compliances may have occurred.