

Site Compliance Report

Site No: REG602801
Site Owner: Waikato District Council
Site Name: Huntly WWTP : McVie Rd, Huntly
Date: 27 January 2021

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH119647.01.02	Current	Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly WWTP into the Waikato River	13/04/2011	31/03/2029
AUTH119648.01.01	Current	Discharge contaminants to air from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH119649.01.01	Current	Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly WWTP	13/04/2011	31/03/2029
AUTH119650.01.01	Current	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH119651.01.01	Current	Discharge treated wastewater (via flooding of wetlands during storm events) to a tributary of the Kimihia Stream from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH130140.01.01	Current	To place a pipe bridge over an unnamed tributary of Lake Hakanoa in Huntly	19/09/2013	10/09/2048

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

2 BACKGROUND

The Huntly Wastewater treatment plant (WWTP) is operated on behalf of the community by Watercare Services Limited (WSL) as part of a contractual arrangement with Waikato District Council. The plant consists of:

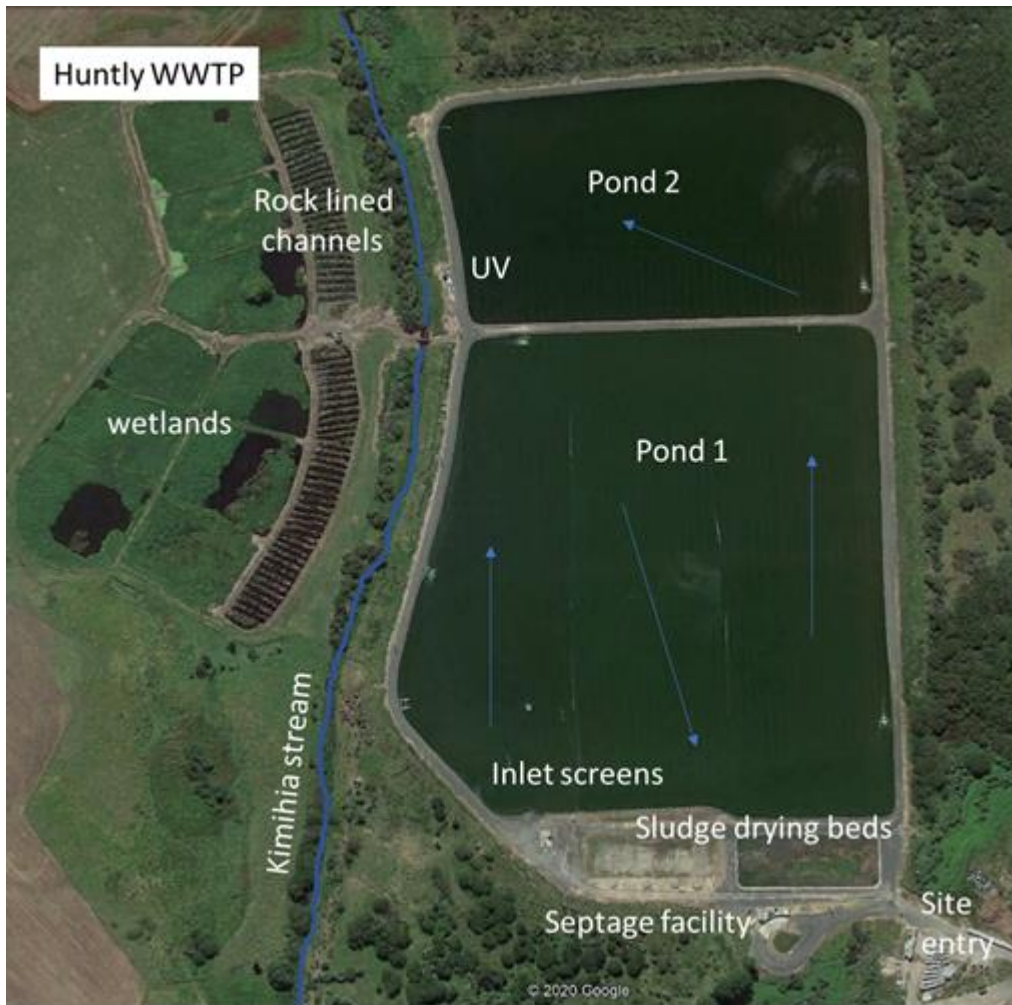
- inlet screens
- two aeration ponds with baffles
- ultra violet disinfection
- rock lined channels
- finishing wetlands
- sludge drying beds
- outfall diffuser in the Waikato River

The WWTP has been having difficulty in meeting the required water quality requirements of the conditions in the associated consents and for this year the plant has site has failed to achieve

compliance with total suspended solids and ammoniacal nitrogen again.

Due to the site reaching the trigger levels for these determinants in previous years the site requires an upgrade to improve compliance to meet a set level of quality. There are currently discussions underway between WSL, WDC and a developer regarding an upgrade to the site in order to prepare the WWTP to receive and treat an additional load from a proposed large industrial and domestic development for Ohinewai a small settlement north of Huntly over the next few years.

To this end the operators have commenced a program of de-sludging the ponds on site and dewatering the sludge in the sludge drying area prior to trucking the dried sludge to Hampton Downs land fill.



2.1 PREVIOUS COMPLIANCE HISTORY

Date Period	Compliance status
1 July 2019 to 30 June 2020	Partial compliance
1 July 2018 to 30 June 2019	Partial compliance
1 July 2017 to 30 June 2018	Partial 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	Partial compliance
1 July 2011 to 30 June 2012	High level of compliance

The consent holder was issued with a formal warning (doc ref 15939843) as a result of last years audit due to the continued non-compliance.

3 COMPLIANCE ASSESSMENT

Unless otherwise specified in this document this assessment covers the period from 1 July 2019 to 30 June 2020.

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.

AUTH119647.01.02 - Water - sewage

Activity Authorised: Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly 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 resource consent conditions below, which shall prevail should any inconsistency occur between the conditions and the application 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 effluent 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 11,500 cubic metres per day.
Evidence	Maximum discharge during this compliance period was 4289m ³ /day
Status Reasoning	
Action Required	Full compliance
6.	The consent holder shall ensure that, no later than 1 December 2012, the quality of the discharge immediately after all controlled treatment processes and before any wetlands shall comply with

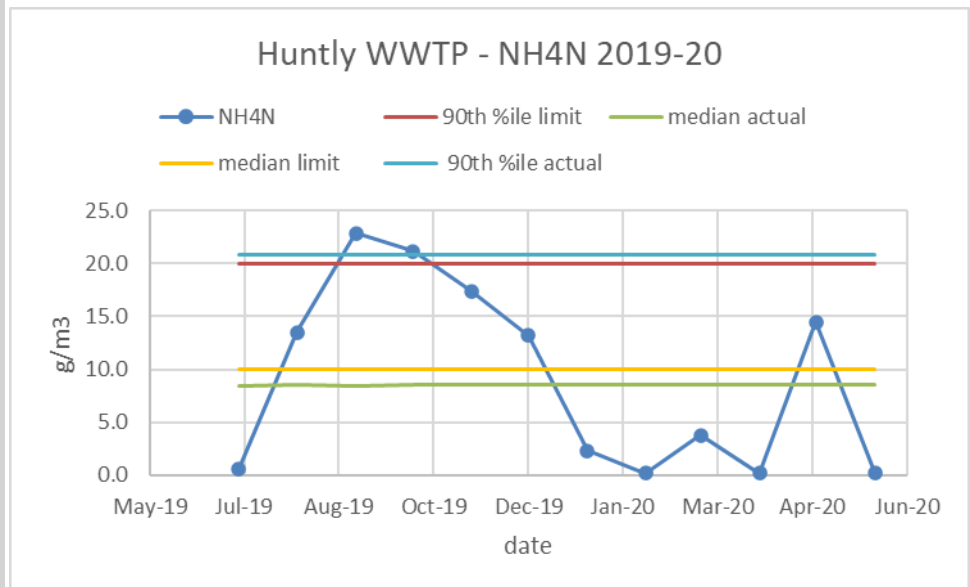
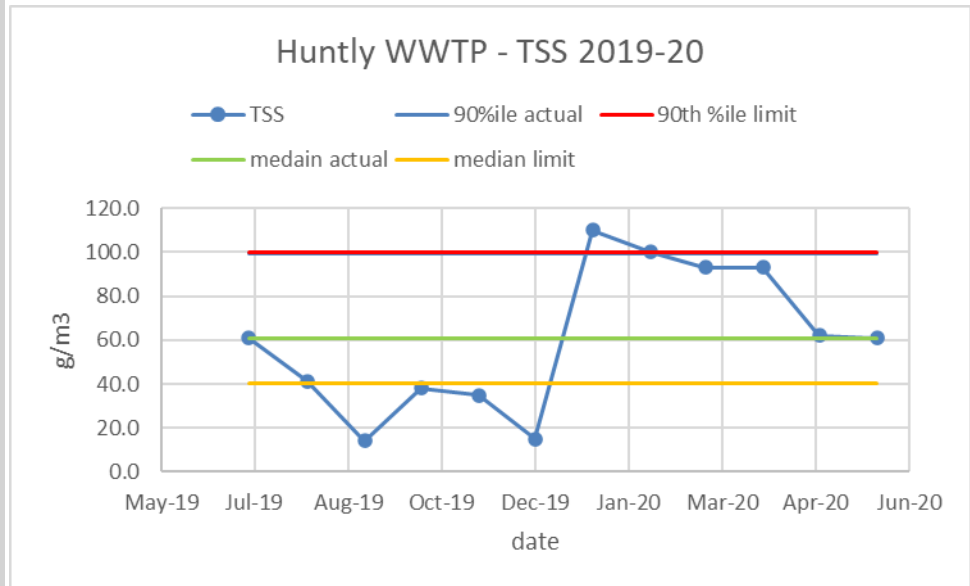
	<p>the following limits: i) The pH of the discharge shall not be less than 6 or greater than 9 pH units; ii) The median five day carbonaceous biochemical oxygen demand concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; iii) The median suspended solids concentration shall not exceed 40 grams per cubic metre and the 90th percentile shall not exceed 100 grams per cubic metre; The monitoring point for suspended solids shall be at the outlet from the gravel beds until 30 November 2016. From 1 December 2016 the median suspended solids concentration shall not exceed 30 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 (TN_{summer}) concentration shall not exceed 20 grams per cubic metre; vii) The median summer (December to May inclusive) total nitrogen load (TN_{load}) 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 (TP_{summer}) concentration shall not exceed 8 grams per cubic metre; x) The median summer (December to May inclusive) total phosphorus load (TP_{load}) 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 in any 12 month period 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 Ngaruawahia Wastewater Treatment Plant is authorised by consent 119642.</p>
<p>Evidence</p>	<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 100 grams per cubic metre; - Non compliant with median, Compliant with 90%ile</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; Compliant with median, Non-compliant with 90%ile</p> <p>v) The median total nitrogen (TN) concentration shall not exceed 25 grams per cubic metre; - Compliant</p> <p>vi) The median summer (December to May inclusive) total nitrogen (TN_{summer}) concentration shall not exceed 20 grams per cubic metre; - Compliant</p> <p>vii) The median summer (December to May inclusive) total nitrogen load (TN_{load}) 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> <p>ix) The median summer (December to May inclusive) total phosphorus (TP_{summer}) concentration shall not exceed 8 grams per cubic metre; - Compliant</p> <p>x) The median summer (December to May inclusive) total phosphorus load (TP_{load}) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 17.3 kilograms per day; - Compliant</p> <p>xi) The median Escherichia coli (E-coli) concentration in any 12 month period shall not exceed 126</p>

cfu per100 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. – Compliant, the number of samples taken and submitted to WRC makes the simple assessment difficult. However even using the worst result from each calendar month the median remains below the limit of 126cfu/100ml – compliant - result was 118cfu/100ml

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. Compliant - the summer median for the highest summer sample results is 58cfu/100ml

Status Reasoning

Non-compliances throughout the period for TSS and NH₄N



Action Required Please take actions to upgrade and improve the WWTP equipment and processes to improve compliance to within set limits **Medium priority non-compliance**

7 Decommissioning of the gravel filters and construction of the rock-lined channel shall be completed within 12 months of commencement of this resource consent.

Evidence

Status

Reasoning		
Action Required		Full compliance
8	The consent holder shall decommission the gravel filters, 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
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	Trigger levels have been met for TSS and cBOD5 over the past three years and the consent holder was advised of this in previous audits. The follow up levels for ammoniacal nitrogen of 16g/m3 has not been met (3 samples sept-Nov2020) and therefore an upgrade to the plant remains a requirement. There are currently plans being discussed for an upgrade to improve compliance and make capacity for a potential inclusion of the Sleepyhead (APL) factory at Ohinewai.	
Status Reasoning		
Action Required	Please submit details and a timeline for the planned upgrade components for the Huntly WWTP.	Low priority non-compliance
11	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 for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.	
Evidence		
Status Reasoning		
Action Required		Full compliance
12	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 reach 90% of the consented limit, as specified in condition 6 of this consent, for 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.	
Evidence		
Status Reasoning		
Action Required		Full compliance

13	Unless otherwise agreed with the Waikato Regional Council in writing, the consent holder shall ensure that the treatment system is upgraded in accordance with the application documentation to the satisfaction of Waikato Regional Council.	
Evidence		
Status Reasoning		
Action Required		Not assessed
14	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.	
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	No rainfall is recorded	
Status Reasoning		
Action Required	Please ensure on site rainfall is recorded and reported as required	Minor technical non-compliance
16	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.	
Evidence	ratio is 3.4	
Status Reasoning		
Action Required		Full compliance
17	The consent holder shall undertake an investigation into the extent and magnitude of ammoniacal-nitrogen in the wastewater discharge plume in the Waikato River during low flow conditions. Sampling of ammoniacal-nitrogen shall, as a minimum, be conducted mid-column at six sites below the discharge outfall on three occasions over the summer period (when flows are low). The frequency of monitoring may be reviewed after a minimum of three years of data has been collected, upon request to and approval by a Programme Manager in the Resource Use Group of Waikato Regional Council.	
Evidence		
Status Reasoning		
Action Required		Not assessed
18	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, 6 and 17. 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
19	The consent holder shall take grab samples of the treated wastewater on a monthly basis, from the sampling location specified in condition 18 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
20	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
21	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 and disposal system is to be operated and maintained to ensure compliance with the conditions of this consent and consents 119648, 119649, 119650 and 119651. 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) 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. Advice 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	A plan exists however it is due for a review and WSL is currently undertaking this.	
Status Reasoning		
Action Required		Full compliance
22	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 21 of this consent.	
Evidence		
Status Reasoning		
Action Required		Full compliance
23	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
24	In conjunction with consent 119648, 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		
Status Reasoning		
Action Required		Full compliance
25	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	A sign is in place	
Status Reasoning		
Action Required		Full compliance
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 erosion has been reported	
Status Reasoning		
Action Required		Full compliance
27	The discharge to the Waikato River shall be via a multi-port diffuser located on the bed of the Waikato River.	
Evidence	The discharge is via a multiport diffuser	
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		
Status Reasoning		
Action Required		Full 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		
Status Reasoning		
Action Required		Full 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 have been undertaken but not at the required frequency	
Status Reasoning		
Action Required		Minor technical non-compliance
31	The consent holder shall forward the results of the monitoring undertaken pursuant to conditions 14, 15, 17 and 19 to the Waikato Regional Council, via electronic means, within one month of receipt of the results by the consent holder.	
Evidence	Monthly data is received from WDC/WSL monthly	
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 the 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; i) Critically analyse the monitoring data collected and comment on any emerging trends; ii) Comment on compliance with the conditions of this resource consent; iii) 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; iv) Comment on infiltration rates and any remedial works planned and the efficacy of these works in subsequent reports; v) 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 the Hopuhopu Manawhenua Roopu.	
Evidence	WDC advises that: Annual report is circulated as required.	
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	WSL/WDC notifies Waikato Regional Council as required.	
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 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	WSL/WDC notifies Waikato Regional Council as required.
Status Reasoning	
Action Required	Full compliance
35	The consent holder shall monitor the actual performance of the Huntly WWTP in respect to the median summertime mass-load of nutrients and of the Huntly WWTP in respect of all other parameters for the period from 1 December 2012 to 31 May 2015 (three summer seasons). i) Immediately following 31 May 2015 the consent holder shall review the performance and review the options for upgrading the treatment processes, all in consultation with Waahi Whaanui Trust and Waikato-Tainui Kauhanganui Incorporated. The preferred upgrade option shall be determined and reported to Waikato Regional Council not later than 31 October 2015. ii) The preferred upgrade option shall be constructed and commissioned not later than 30 November 2016. iii) The 2015 review shall include consideration of the future of both the surface-flow and the subsurface-flow wetland cells, based on the monitored performance and the decision in relation to the preferred upgrade option, all in consultation with Waahi Whaanui Trust and Waikato-Tainui Kauhanganui Incorporated. iv) The 2015 review shall also give consideration to the ongoing appropriateness of the median combined summertime mass-load limits for Total Nitrogen and Total Phosphorous from Huntly WWTP, taking account of the actual performance of the two plants from 1 December 2012 to 31 May 2015 and any changes in the environmental objectives for the Waikato River after 31 March 2011. v) Recommendation whether the wetlands should remain in the treatment process or be decommissioned and the reasons for this decision; vi) A plan for the decommissioning or alteration of the wetland, should the conclusion be that the wetlands should be decommissioned or altered in some way.
Evidence	
Status Reasoning	
Action Required	Full compliance
36	Waikato District Council 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 the 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 the matters listed in condition 35 above. 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	
Status Reasoning	

Action Required		Full compliance
37	The consent holder shall, by 30 September 2015 and every five years thereafter, submit to Waikato Regional Council a wastewater treatment system 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) improvements 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 discharges to the Total Nitrogen and Total Phosphorus load in the Waikato River at Mercer Bridge since the granting of this consent.	
Evidence	next review due by 2021	
Status Reasoning		
Action Required		Not assessed
38	The Waikato Regional Council may, in the six month period following 30 September 2015 and every five years thereafter, serve notice on the consent holder under section 128(1) of the Resource Management Amendment Act (1991), of its intention to review the conditions of this resource consent for the following purposes: i) To review the effectiveness of the conditions of this resource consent in avoiding or mitigating any adverse effects on the environment from the exercise of this resource consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or ii) To review the adequacy of and the necessity for monitoring undertaken by the consent holder and specifically to review the frequency of record keeping and the method of record collection for the purposes of determining the most appropriate method and frequency; or iii) If necessary and appropriate, to require the holder of this resource consent to adopt the best practicable option to remove or reduce adverse effects on the surrounding environment; or iv) To review the conditions of this resource consent to ensure the exercise of this resource consent is not inconsistent with the Vision and Strategy of the Waikato-Tainui Raupatu Claims Waikato River Settlement Act 2010 (Schedule 2 – Vision and strategy for Waikato River) and if necessary to address any such inconsistencies by way of further or amended conditions. Note: Costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.	
Evidence	next review due by 2021	
Status Reasoning		
Action Required		Not assessed
		Authorisation Compliance: Partial compliance

AUTH119648.01.01 - Air - odour

Activity Authorised: Discharge contaminants to air from activities associated with the Huntly 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	Contractors are advised of consent conditions
Status Reasoning	
Action Required	Full compliance
4	The operation, management and maintenance of the Huntly 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 odour beyond the boundary have been received by WRC.
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 discharge of airborne contaminants beyond the boundary have been received by WRC.
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 119647. 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	The odour management plan is incorporated into the sites Operation and Management Plan doc

	ref 3516604	
Status Reasoning		
Action Required		Full compliance
7	In conjunction with consent 119647, 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; 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	CRM system is operated by WDC	
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	WSL/WDC notify WRC of any events relating to odour	
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance: Full compliance		

AUTH119649.01.01 - Bed - structure

Activity Authorised: Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly 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	compliant	
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	Ports are closed	
Status Reasoning		
Action Required		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	Last dive survey was undertaken on 11 May 2020	
Status Reasoning	Dive surveys are undertaken as and when safe conditions are present. This has led to dive surveys not being undertaken as frequently as required. The consent holder will enquire about reducing the frequency of dive surveys later this year.	
Action Required	Dive surveys	Minor technical non-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	This requirement is not always complied with. The consent holder has enquired about the possibility of reducing the frequency of dive surveys	
Status Reasoning		
Action Required	Make a formal request to Waikato Regional Council to reduce the frequency of dive surveys	Minor technical non-compliance
9	The consent holder shall be responsible for the structural integrity and maintenance of the multi-port diffuser and for the provision and maintenance of any erosion control works that become necessary to preserve the structural integrity of the multi-port diffuser, 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	Diffuser is in good working order as reported in last dive survey.	
Status Reasoning		
Action Required		Full compliance
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 refuelling and machinery servicing and maintenance. Refuelling 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		Full compliance
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	No evidence of any damage that is likely to become a navigational hazard	
Status Reasoning		
Action Required		Full compliance
Authorisation Compliance: High level of compliance		

AUTH119650.01.01 - Water - sewage

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

AUTH130140.01.01 - Bed - structure

Activity Authorised: To place a pipe bridge over an unnamed tributary of Lake Hakanoa in Huntly		
Condition No.	Description	
1	The aerial pipeline authorised by this consent shall be undertaken in general accordance with the application (Recorded as document #2830872 on the Waikato Regional Councils document recording system), and as identified in the resource consent conditions below which shall prevail in the event of any inconsistency between the aforementioned documentation and the conditions.	
Evidence		
Status Reasoning		
Action Required		Full compliance
13	<p>The consent holder shall be responsible for the design, structural integrity and maintenance of the pipeline, and for any erosion control works that become necessary to preserve the integrity and stability of the pipeline and/or to control erosion as a result of the exercise of this resource consent.</p> <p>Advice Note:</p> <p><i>A separate resource consent may be required as a result of the need to undertake erosion control works. Any such resource consent shall be obtained by the consent holder at their sole expense prior to any works being undertaken.</i></p>	
Evidence	The pipe bridge is maintained as required.	
Status Reasoning		
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
AUTH119647.01.02	Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly WWTP into the Waikato River	Partial compliance
AUTH119648.01.01	Discharge contaminants to air from activities associated with the Huntly WWTP	Full compliance
AUTH119649.01.01	Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly WWTP	High level of compliance
AUTH119650.01.01	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Huntly WWTP	Full compliance
AUTH119651.01.01	Discharge treated wastewater (via flooding of wetlands during storm events) to a tributary of the Kimihia Stream from activities associated with the Huntly WWTP	Not assessed
AUTH130140.01.01	To place a pipe bridge over an unnamed tributary of Lake Hakanoa in Huntly	Full compliance

Overall Site Compliance: Partial compliance

5 DISCUSSION AND CONCLUSIONS

The site has once again failed to comply with TSS and ammoniacal nitrogen limits and this is unsatisfactory. The consent holder was formally warned for this non-compliance in the previous audit and no improvements have been identified during this current compliance period. The options for enforcement are:

- issue a formal warning for the current period,
- abatement notice to cease the unauthorised discharge,
- send a report to the enforcement decision group for further guidance,
- issue a letter of direction requiring a written response to include a timeframe and detail of the upgrade works planned.

As a result of this ongoing non-compliance I recommend a formal warning be issued. Further I also recommend that a letter of direction be issued requiring the consent holder to provide Waikato Regional Council with a written timeline for the proposed upgrades and improvements planned for the site. This will ensure that Waikato Regional Council has been formally notified of the actions together with timeframes for improvements.

If Waikato Regional Council has formal commitment for the proposed improvements together with envisaged timeframes, then potential further enforcement options can be revised for this compliance period.

At a recent liaison meeting between WSL/WDC and Waikato Regional Council on 21/01/21 the planned improvement were discussed, and the reduction of the frequency of the dive surveys. The consent holder was advised how to seek a change to the consent to authorise this amendment.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition	Action Required
AUTH119647.01.02	10	Please submit details and a timeline for the planned upgrade components for the Huntly WWTP.
AUTH119647.01.02	6.	Please take actions to upgrade and improve the WWTP equipment and processes to improve compliance to within set limits for TSS, NH ₄ N and <i>E.coli</i>

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

I recommend a formal warning is issued for the non-compliances that have been identified during this compliance period.

I also recommend that a letter of direction be issued requiring the consent holder to submit in writing a list of proposed upgrades and actions that WDC/WSL intend to undertake to improve compliance at this site along with expected timeframes.

I also recommend that this site remains as a focus area 1 priority for the 2020-21 compliance period due to current compliance levels and increased public interest regarding the proposed Ohinewai Sleepyhead industrial development.



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

Date: 12 February 2021

7.1 Decision

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



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

Date: 15 February 2021

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.