

23/02/2021

Matthew Young

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Dear Matthew Young,

**Request for Information – Local Government Official Information and Meetings Act 1987**

We refer to your official information request dated 28 January 2021 for information regarding the Trade Waste Report and Consent Breaches 2020 Calendar.

Please find the information you have requested below.

- 1) Whether this annual report is published publicly (either through HCC, UHCC, WWL, GW or any other relevant agency)

The trade wastes annual report is a part of the annual resource consent report to Greater Wellington Regional Council from the Seaview Wastewater Treatment Plant (WWTP). Whilst the TW report is not separately published the RC report to GW is available publically.

- 2) The report notes 19 incidences of significant non-compliance during the 2019-20 reporting period. Can HCC please break these 19 incidences down by consent holder?

Significant non-compliance is usually defined as sample results twice the consent maximum and we break it down further based upon whether the discharge is greater than 5m<sup>3</sup> per day or less which relates to the ability of the discharge to affect our network or treatment plant. Larger discharge volumes can potentially have more impact.

Non-compliant sample results are normally followed up by re-sampling events at the discharger's expense with those events normally showing a return to compliance.

The 19 noted include the following sites:

Daily discharge volume greater than 5m <sup>3</sup>	Business description and site code
Waste Management Technical Services	Waste treatment TRA20638
Mexican Supplies	Corn chip manufacture TW160013
Groenz	Sauce manufacture TRA20961
Charta packaging	Corrugated cardboard manufacture and printing TRA20640
Wellington Electroplating	Electroplater TW130027
Aluminium Extrusion Company – Anodising Division	Anodising of window joinery – closing site now. TRA20347

Daily discharge volume less than 5m3	Business description and site code
New World Lower Hutt	Supermarket TRA20521
New World Stokes valley	Supermarket TRA20630
Bostik	Adhesive manufacture TRA20641
CPC	Detergent/cleaning agent manufacture TRA21261
Te Aro Brewery	Craft Brewery TW170023
Boneface	Craft Brewery TW170021
Intergroup	Infrastructure maintenance and street sump cleaning TRA20647

- 3) Can HCC also describe for each incidence of significant non-compliance during the 2019-20 reporting period the nature of the breach and the HCC response?

Daily discharge volume greater than 5m3	Breach - response
Waste Management Technical Services	Site monitored at least monthly. Elevated TPH (hydrocarbons) Aug 2019, limit 30mg/L - monitoring showed 76 mg/L. Had been occasional issue but changes made to their processes and plant have remedied it. Even when non-compliant the levels were of little or no consequence to network or Councils WWTP.
Mexican Supplies	Site monitored bi-monthly unless non-compliance requires a re-sample. Three issues were noted, Aug 19, Jan 20 and May 20. Because of the lime steeping process for the corn used the pH can be elevated above their consent limit (10.5). A newer lime dosing system was introduced but it has failed to provide noticeable improvements so a dosing system to reduce the overall pH may be needed. The elevated pH causes no particular concerns in the sewer as slightly elevated pH (>10.5) is of less concern to sewers than lower pH (< 5).
Groenz	The site is monitored bi-monthly unless non-compliance requires a re-sample. There is also a wastewater flow meter to which Council has real-time web based access. 3 non-compliance events were noted in July, October and December 2019 related to elevated solids, COD and oil and grease. The sites pre-treatment plant has been under redesign to improve consistency and performance and key components of the old system were undersized. Performance has been affected by manual production processes. That trapping component has been replaced with a larger more effective unit and there has been a significant investment (around \$4M) recently in automation. Whilst having some teething issues during commissioning it appears to have improved discharge quality. Council had repeatedly met with them to gain improvements and the large user charges sums required from the site to cover the increased load are also

	<p>motivating. Because of the nature of the load (food based) the wastewater system has been able to readily cope with the load.</p>
Charta packaging	<p>The site is monitored every 3 months unless non-compliance requires a re-sample, there was one incident noted in May 2020. Discharge volume is around 15 to 20m<sup>3</sup> per day. Their pre-treatment system for printer and corrugated cardboard production waste water is less than ideal. It was to be replaced as part of another project but their owners changed their mind. The end result is occasional elevated solids levels and copper levels (from some inks. Adequate maintenance of their system tends to keep matters under control. Council has flagged to them that a new more effective pre-treatment plant will be required. The copper level whilst twice the limit did not cause an issue with management of Councils WWTP bio solid (where heavy metals tend to accumulate in WWTP's) as overall levels are well managed and below our old bio solid limits. Note: I do not believe any plant in the country (with or without industry) can meet the current bio solids guidelines levels</p>
Wellington Electroplating	<p>The site is monitored every 3 months unless non-compliance requires a re-sample. Generally the site is complaint but monitoring in May 2020 noted a non-compliance for elevated Nickel (15 vs limit of 10 g/m<sup>3</sup>) and Zinc (26 vs 10) levels. From a follow-up visit it seems likely the issue was related to poor draining practice (manual process) though there is the possibility of a failure to maintain their pre-treatment dosing system which is intended to help drop out metals. The elevated metal levels did not compromise Councils WWTP bio solid and caused no network or plant issues, the levels and more importantly the masses, though non-compliant were still relatively low.</p>
Aluminium Extrusion Company – Anodising Division	<p>In March 2020 monitoring picked up that the pH was elevated (11.2 vs 10 limit). Other factors good. Meets the definition for significant non-compliance but not of great concern. Site has a very long history of good compliance. Site closing in near future.</p>

<b>Daily discharge volume less than 5m<sup>3</sup></b>	<b>Business description and site code</b>
New World Lower Hutt	<p>The site is monitored every 6 months unless non-compliance requires a re-sample. Monitoring identified significant non-compliance for oil and grease levels in Aug 2019. This prompted a number of visits and assessment of the need to replace a deficient and damaged old grease trap for the deli area. Replacement is not simple but New World has not been fast to act to protect the downstream</p>

	sewer, meetings have occurred, reminders have been sent and further action is pending.
New World Stokes valley	Sampling in July 2019 identified elevated oil and grease levels however this was not consistent with our visit observations. At that point in time we were experiencing a number of issues with sampling from the lab and further training has occurred for relatively new staff to improve their processes. This result is believed to be unreliable.
Bostik	Sampling in May 2020 identified notably elevated COD (Chemical Oxygen Demand) of 18000 vs limit of 2500 g/m <sup>3</sup> and Suspended Solids (9000 vs 1000 g/m <sup>3</sup> consent limit). The current sample point is less than ideal and sampling correctly not easy. A visit identified a combination of poor sample point, possible inadequate maintenance of the first stage trap and the need for a new larger second stage trap. This requirement has been issued as part of their new trade wastes discharge consent along with some other minor changes. Discharge volume is quite low so the significance of any issue is limited.
CPC	Elevated COD and detergent levels in June 2020. Occasional issue of little significance given very small discharge volume and significant dilution in nearby sewer. Essentially they are a small scale detergent manufacturer who wash residue from some batches to a waste tank and periodically discharge the tank slowly to sewer. Total discharge to sewer is usually around 5m <sup>3</sup> per 2 months
Te Aro Brewery	The site is monitored every 6 months unless non-compliance requires a re-sample and given the relative newness of the craft beer industry we have also carried out a number of proactive characterisation samples. The November 2019 sample identifies elevated COD (16000 vs 10000 g/m <sup>3</sup> limit) and elevated suspended solids (4300 vs 1500 limit). Site visited and improvements to their waste handling system suggested. Discharge volumes are relatively small and a long run of private sewer limits risks to council sewer. Increased loads result in increased user charges bills which tend to focus them on improvements.
Boneface	The site is monitored every 6 months unless non-compliance requires a re-sample and given the relative newness of the craft beer industry we have also carried out a number of proactive characterisation samples. The November 2019 sample identifies elevated COD (36000 vs 10000 g/m <sup>3</sup> limit) and elevated suspended solids (11000 vs 1500 limit). We have required modifications to their waste tank which improve the discharge and the reliability of sampling given there was the potential to sample incorrectly. Brewery discharges tend to be high in COD (10,000 g/m <sup>3</sup> is common) and solids can be elevated.

	However the material is readily treatable in our WWTP.
Intergroup	Sampled twice a year. December 2019 sample identified elevated solids levels (4200 vs 2000 g/m <sup>3</sup> limit). Possible to miss-sample the setup however a visit identified a number of improvements were needed at the site including modifications to the trap (done) and additional bunding to protect the storm water system. More recently the regional council and ourselves have required a number of other improvements to protect the storm water network and upgrade the wash areas (to the sewer trap system).

- 4) Can you also please seek for me the number of incidences of significant non-compliance per year for the previous 5 years?

Period	Sig non-compliance (includes sites both greater than 5m <sup>3</sup> per day and below.)	Comment
July 2019 to June 2020	19	
July 2018 to June 2019	23	
July 2017 to June 2018	10 *	See below note
July 2016 to June 2017	12 *	See below note
July 2015 to June 2016	18	

Note that due to multiple successive staff changes at the independent testing laboratory following a retirement there has been a prolonged period of missed sample events and less than ideally taken samples. We have gone to significant efforts with the samplers to help them understand some of the tricky sites and general principles but wastewater sampling is not an exact science. However we have increasing confidence now.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Please note that this letter (with your personal details removed) will be published on the Council's website

Yours sincerely,

Hutt City Council