

**Title:** 21-24 Wastewater Treatment Plant Compliance Report  
**Section:** 4 Waters Operations  
**Prepared by:** Tracey Panton – Wastewater Treatment and Compliance Officer  
**Meeting Date:** Thursday 11 March 2021

---

Legal: No

Financial: No

Significance: **Low**

---

## Report to WASTEWATER MANAGEMENT Committee for information

### PURPOSE

The purpose of this report is to inform the Wastewater Management Committee and the Chief Executive on the compliance of the Gisborne Wastewater Treatment Plant (WTP) located at Banks Street.

### SUMMARY

The WTP for the 2019/20 year was compliant with its resource consent.

There were significant challenges throughout the year taking equipment out of service for renewals and repairs. Throughout the period the WTP team managed the daily operations and ensured that compliance was maintained during these times.

**Attachment 1** lists the clauses of Council's resource consent and the compliance status for each clause.

The decisions or matters in this report are considered to be of **Low** significance in accordance with the Council's Significance and Engagement Policy.

### RECOMMENDATIONS

**That the Wastewater Management Committee:**

- 1. Notes the contents of this report.**

*Authorised by:*

**David Wilson - Director Lifelines**

---

**Keywords:** Gisborne, Wastewater, Treatment, Plant, Consent, Compliance

## BACKGROUND

1. The Gisborne Wastewater Treatment Plant (WTP) was commissioned in 2010 and has now been operating for nearly ten years. The treatment processes include screening, grit removal, and biological treatment.
2. Council through consultation with the community has chosen the option to upgrade the WTP to include ultraviolet disinfection and solids removal. The deadline for the commissioning of this upgrade was December 2020. This has not been achieved and is programmed to be commissioned by mid-June 2022.

## DISCUSSION and OPTIONS

3. The WTP was operationally compliant for the 2019/20 year. A table outlining the resource consent clauses and the compliance for the 2019/20 year with each clause is attached to this report.

## ASSESSMENT of SIGNIFICANCE

Impacts on Council's delivery of its Financial Strategy and Long Term Plan

**Overall Process:** Low Significance

**This Report:** Low Significance

Inconsistency with Council's current strategy and policy

**Overall Process:** Low Significance

**This Report:** Low Significance

The effects on all or a large part of the Gisborne district

**Overall Process:** Low Significance

**This Report:** Low Significance

The effects on individuals or specific communities

**Overall Process:** Low Significance

**This Report:** Low Significance

The level or history of public interest in the matter or issue

**Overall Process:** High Significance

**This Report:** Low Significance

4. The decisions or matters in this report are considered to be of Low significance in accordance with Council's Significance and Engagement Policy.
5. There is significant interest from the community in wastewater and in the compliance of the WTP.

## TANGATA WHENUA/MĀORI ENGAGEMENT

6. The Wastewater Management Committee is made up of four Iwi representatives and four Councillors.
7. There is active consultation with the KIWA group, which is made up of the Iwi in the Gisborne area.
8. Further consultation is planned with the 'Alternative Use and Disposal' option requirements in the consent.

## COMMUNITY ENGAGEMENT

9. The community will be consulted as part of the process of the variation to the existing consent.

## CLIMATE CHANGE – Impacts/Implications

10. There is no impact on climate change.

## CONSIDERATIONS

### Financial/Budget

11. Council has approved a budget of \$34.8m for the implementation of disinfection and solids removal at the WTP and will be confirmed as part of the 2021 LTP.
12. Future budget for the operation of the WTP is significantly higher than originally forecast. This is due to the higher operational costs of the WTP upgrade. This will influence rates for the district. The change from the current operational cost to the new operational cost is approximately triple. This is now \$2,130,184 p.a. up from \$790,000 p.a. and is included in the draft 2021 Long Term Plan.

### Legal

13. Council has not met its deadline of 30 December 2020 to implement the disinfection and solids removal option. Council has committed to achieving this by mid-June 2022.
14. There are no legal implications from the operational compliance status of the WPT.

## POLICY and PLANNING IMPLICATIONS

15. This report is consistent with Council's policies and plans.

## RISKS

16. There are no major risks associated with the decisions or matters.

## NEXT STEPS

Date	Action/Milestone	Comments
30 July 2021	Produce Annual Report 2020/21	
30 June 2022	Disinfection to be fully operational	

## ATTACHMENTS

1. Attachment 1 - Wastewater Treatment Plant and Marine Outfall Compliance Report 2019/2020 [21-24.1 - 29 pages]

## Wastewater Treatment Plant and Marine Outfall Compliance Report 2019/2020

The Independent Review Panel reviewed this consent in 2018 and the report was accepted as draft in May 2020. The action items are currently being reviewed to allow the report to be finalised.

### DEFINITIONS

In and for the purposes of the following, these definitions will apply:

Stage 1 Completion means the date of commissioning of the permit holder's Biological Trickling Filter (BTF) component of its Waste Water Treatment Plant and is within 42 months after the date of this permit being issued.

Stage 2 Completion means the date of commissioning of the permit holder's Solids Contact, Clarifiers and Ultraviolet Disinfection or equivalent Waste Water Treatment Plant and is within 66 months after the date of this permit being issued or such extended date as set out in the conditions below to allow for trials of Stage 1 performance.

### (Regional Consents)

Clause No.	Condition	Compliance Review June 2020
<b>General Conditions in Accordance with the Application</b>		
Clause 1	The activity consented by this permit shall be carried out in general accordance with the consent applications dated 30 September 2005 and the applications for variations to these permits dated 7 December 2008 and 19 December 2014.	The activity is considered to currently be operating in accordance with the consent application.
<b>Upgrading of the Wastewater Network</b>		
Clause 2	The permit holder shall undertake pipe network improvement works to limit flows to the treatment plant to 33,000 m <sup>3</sup> /day except in extreme events. The extent of improvement works shall be determined using computer modelling of the network and in accordance with the best practicable option requirements of the Resource Management Act 1991 (RMA), and subject to review by the Independent Review Panel (INDEPENDENT REVIEW PANEL). The permit holder shall report on progress in 2012 and shall provide a report to the consent authority setting out a programme for the completion of any works outstanding at that time	The Independent Review Panel reviewed this clause in 2008. As part of the above review, the outcomes of the computer modelling carried out in compliance with clause 2 showed that a flow of 400 l/s was appropriate for the characterisation of extreme events, that the 33,000m <sup>3</sup> daily threshold would be achieved if flows > 400 l/s were bypassed, and that this would be achieved in implementation of the project as designed. This led to the following recommendation by the WMC to Council:

Clause No.	Condition	Compliance Review June 2020
		<p>2. That the Conditions of Consent (general conditions 1 and 2 and the definition of “extreme event”) are satisfied by the following:</p> <p>a. The peak instantaneous flow rate to the wastewater treatment plant shall be 400 l/s. The wastewater treatment plant maximum daily capacity shall be 33,000m<sup>3</sup>/d. b. An extreme event shall be any flow of domestic wastewater arriving at the inlet to the screening plant which exceeds 400 l/s.</p> <p>The WWTP, constructed afterwards in 2010, was designed to satisfy the above performance standard. No further pipe network improvements were therefore required after construction of the plant in 2010 to satisfy this condition.</p>
Clause 3	The permit holder shall submit to the consent authority by 31 December 2017 a report confirming that all practicable steps have been taken to ensure compliance with condition 2	A report was submitted by 31 December 2017, confirming compliance with this condition
<b>Installation, Monitoring and Investigation of Wastewater Treatment Plant</b>		
Clause 4	<p>The permit holder shall:</p> <p>a) Use its best endeavours to ensure that the Single BTF Plant Commissioning occurs by 31 December 2010; and Wastewater Disinfection by 31 December 2012 and in any event no later than 31 December 2014.</p>	The plant was commissioned on time.
	<p>b) Undertake further feasibility work to confirm the most appropriate long-term management option for Gisborne’s wastewater, including the feasibility and level of community acceptance of an alternative wastewater management system, which may involve a range of alternative, use and disposal (AUD) options, to wastewater disinfection, provided that any alternative wastewater management system to wastewater disinfection must meet or exceed the standards for wastewater discharge set out in clauses 40 – 62 of this consent; and</p>	<p>A project for the upgrade of the Wastewater Treatment Plant is currently underway.</p> <p>The upgrade includes a new pump station, lamella clarifiers, disk filters and UV disinfection.</p> <p>Estimated commissioning date is mid-2022.</p>

Clause No.	Condition	Compliance Review June 2020
	c) By 31 December 2016, confirm the feasibility of an alternative wastewater management system and commit to undertaking the further consultation, detailed design, and consenting processes in order to implement this system; and	An alternative wastewater management system was confirmed as technically feasible by 31 December 2016, and there was a commitment to undertaking the further consultation, detailed design, and consenting processes in order to implement this system.
	d) By 31 December 2018, lodge the necessary applications and/or notices required under the RMA to implement the preferred alternative wastewater management system with the intention for construction to commence by 31 December 2019 and in any event no later than 12 months after the commencement of all necessary authorisations.	The December 2019 milestone has been passed. A decision was made not to continue with the alternative treatment process.
	e) If at any of the milestones in b), c) and d) above, the permit holder decides not to further investigate, seek consent for or implement an alternative wastewater management system as the preferred long-term option to manage Gisborne's wastewater, the permit holder must notify the consent authority in writing and shall install wastewater disinfection within 24 months of the date of that notice.	Council is implementing solids removal and UV treatment to achieve the required disinfection. Treatment options were consulted on with the Community as part of the LTP process
	f) If the permit holder fails to confirm feasibility of an alternative system by 31 December 2016 or fails to lodge the necessary applications and/or notices by 31 December 2018 in accordance with clauses 4(c) and (d) above, the permit holder shall install wastewater disinfection within 24 months of those relevant milestone dates	The Wastewater Treatment Plant upgrade project is underway. Work is planned to start in March 2021 and commissioned in mid-2022. Detailed design has been completed, early procurement of essential equipment has also been completed.
<b>BTF Plant Monitoring and Investigation Study</b>		
Clause 4A	a) The permit holder shall establish and retain by appointment of suitably qualified persons, the Wastewater Technical Advisory Group (WTAG), to initiate the BTF Plant Monitoring and Investigation Study and provide advice and peer review for the Wastewater Alternative Use and Disposal (AUD) Programme	This was delivered. The WTAG was formed. They initiated the BTF plant monitoring and investigation study; provided advice and peer review for the AUD programme
	b) The permit holder shall provide resources for organisational and administrative support to facilitate the development, role and function of the WTAG. The WTAG shall comprise representatives of: <ul style="list-style-type: none"> <li>• Medical Officer of Health Tairāwhiti District Health Board</li> </ul>	This was delivered.

Clause No.	Condition	Compliance Review June 2020
	<ul style="list-style-type: none"> <li>• Department of Conservation</li> <li>• Te Runanga O Turanganui A Kiwa ☒ Ngati Oneone</li> <li>• Environmental Groups</li> <li>• Gisborne District Council staff</li> <li>• Others who may have a particular contribution to make to the workings of the group. The WTAG may appoint, or invite, other persons to participate in an advisory capacity.</li> </ul> <p>The composition of the WTAG is subject to invitees' willingness to participate</p>	
	(c) (i) The permit holder shall initiate the BTF Plant Monitoring and Investigation Study within 3 months of the issue of this permit.	This was delivered.
	(ii) Within six months of the issue of this permit the WTAG shall formulate the scope and methodology of the study, which is: a study into the scientific rationale and relevance of existing permit conditions 36, 37, 42, 43 and 44 and will have reviewed work to date on the AUD Programme.	This was delivered.
	(iii) The WTAG shall report at least annually and at such other times as may be necessary to the Wastewater Management Committee (WMC) and consent authority, and present such reporting to any public forum that the WMC considers appropriate. The report shall review progress on the BTF Plant Monitoring and Investigation Study, permit conditions 36, 37, 42, 43 and 44, and advice provided on the AUD Programme	<p>The WTAG did not provide annual reports except for the Third Annual Reports, but did regularly report back to the WMC regularly through WMC meetings</p> <p>The WTAG voluntarily stopped meeting as they felt that they were no longer of use to the project in 2016 when the decision was made not to follow the alternative option.</p>
	(iv) The third annual report from the WTAG, (3 years after Single BTF Plant Commissioning) shall report and recommend to the WMC and Council in regard to: <ul style="list-style-type: none"> <li>a) Summaries of monitoring results of the BTF Plant Monitoring and Investigation Study.</li> <li>b) The extent of biotransformation being achieved by the BTF Plant.</li> <li>c) Appropriate parameters and a monitoring programme for ongoing assessment of biotransformation.</li> <li>d) Appropriate parameter limits to ensure biotransformation is being achieved.</li> </ul>	A third annual report, including a supplementary report and recommendations, were provided in 2013.

Clause No.	Condition	Compliance Review June 2020
	<p>e) Review of existing permit conditions: 37, 42 and 43 and recommend any changes to these.</p> <p>f) Recommend what additional treatment steps (if any) are required to achieve biotransformation and other requirements that may be necessary to improve the quality of the discharge to avoid adverse effects.</p> <p>g) In the event of the WTAG being unable to make a recommendation to the permit holder as per f) above, or the permit holder refusing to implement any recommendations as per f) above, then clause 37 and clause 43 shall take effect.</p>	
	<p>(d) The BTF Plant Monitoring and Investigation Study shall:</p> <ul style="list-style-type: none"> <li>• Investigate the extent of biotransformation achieved by the Single BTF plant, including the disinfection plant once it is installed: <ul style="list-style-type: none"> <li>- Define biotransformation</li> <li>- Determine the relevance of BOD as a measure of biotransformation</li> <li>- Determine the relationship between Suspended Solids and biotransformation of wastewater</li> <li>- Determine through monitoring, data analysis and research relevant parameters to be used in assessing biotransformation</li> </ul> </li> <li>• Investigate the extent of micro-organism reduction achieved by the BTF plant and wastewater disinfection plant.</li> <li>• Investigate through surveys, literature reviews and research the importance of social, cultural and environmental components of biotransformation in the treatment of wastewater.</li> <li>• Determine the relationship if any between the BTF plant BOD loading and micro-organism reduction.</li> <li>• Investigate the relationship between wastewater treatment processes and their carbon footprint.</li> </ul>	<p>The study required evaluation to confirm if all of these matters were complied with.</p> <p>This is part of the Independent Review Panel Report.</p>
	<p>(e) Peer review of the AUD Programme shall – ensure that the appropriate range of advice is being received by the WMC and that the advice is presented in a timely and transparent manner.</p>	<p>This relates to the WTAG self-audit process.</p>

Clause No.	Condition	Compliance Review June 2020
<b>Alternative Use and Disposal</b>		
Clause 5	The permit holder shall initiate a research/study programme (“the programme”) within three months of the issue of this permit to investigate AUD of wastewater trials and undertake trials designed to identify feasible options for AUD after Installation of Wastewater Disinfection.	The AUD programme was initiated within 3 months of the issue of this consent.
Clause 6	The permit holder shall invite individuals or organisations who could be directly affected by particular alternative use or disposal trials, or subsequent works that arise from them, to participate in relevant parts of the programme. Such parties shall include, but not necessarily be limited to, larger waste producing industries, Federated Farmers and relevant tangata whenua groups on any matters relating to the use of productive land.  Individuals or organisations who could be directly affected by particular alternative use or disposal trials were included.	Individuals and organisations were invited to join the WTAG.
Clause 7	The programmes required under condition 4A and condition 5 shall be developed having regard to the Best Practicable Option principles set out in the RMA and shall include consideration of: The alternative management options available to avoid, remedy or mitigate adverse effects of the discharge of treated wastewater on the marine environment and the financial implications of the alternatives, and their effects on the environment compared to discharge to the marine environment;  a) The state of technical and scientific knowledge and the likelihood that the alternatives can be successfully implemented;  b) The effects of alternatives on existing land uses and the options available to ensure compatibility.	The WTAG was tasked to look at this and have reported on their findings.
Clause 8	The permit holder shall use its best endeavours to adopt those AUD options that are identified as feasible and which will enable the progressive removal of the treated human sewage from the discharge, via the marine outfall, with the objective of complete removal by 2020.	Feasible AUD options have not yet been identified, and therefore adoption of options is not possible.
<b>Industrial Treatment</b>		
Clause 9	The permit holder shall take all practicable steps to ensure that any industrial wastewater entering the wastewater network, after 31 December 2012, will not result in the combined discharge of wastewater from the Council’s wastewater system to the marine environment failing to meet the requirements of section 107 of the RMA. As a minimum, the permit holder shall seek the advice of the Independent Review Panel described in condition 21 on the adequacy of existing or future industrial wastewater management methods to ensure this condition will be met.	There have been no plumes attributable to the Wastewater Treatment Plant since the BTF was installed.  An Independent Review Panel has reviewed this and given a report.

Clause No.	Condition	Compliance Review June 2020
Clause 10	The permit holder shall investigate the feasibility of minimising, reusing or further beneficially treating the separated industrial component of the wastewater stream and shall use its best endeavours to secure the co-operation of local industry for this purpose.	There is a project lead by industry in the industry separated line, encouraged by Council, to obtain funding for finding use for solid and liquid wastes and scope implementation of the option. Ongoing work with industries to minimise the water use and therefore wastewater production and to ensure compliance is done every year as part of the consenting process.
Clause 11	The permit holder shall use its best endeavours to identify partial or possible complete reuse or further beneficial treatment of the industrial discharge.	The WTAG investigated options for industry.
<b>Wastewater Management Committee</b>		
Clause 12	The permit holder shall establish, and retain, a Wastewater Management Committee (WMC) as a standing committee of the Gisborne District Council under clause 30 of the Seventh Schedule of the Local Government Act 2002 within three months of the issue of this permit, or as soon as practical thereafter.	The WMC was established and are currently still in operation.
Clause 13	The permit holder shall provide organisational and administrative support to facilitate the development, ongoing role and function of the WMC.	Council is providing ongoing support.
Clause 14	The membership of the WMC shall comprise four Councillors and four Tangata Whenua representatives and other members that the WMC itself shall determine from time to time.	The membership requirement has maintained its compliance.
Clause 15	<p>The WMC may appoint, or invite participation in an advisory or consultative capacity, other persons from:</p> <ul style="list-style-type: none"> <li>• Gisborne District Council staff</li> <li>• Tairāwhiti District Health Board</li> <li>• Department of Conservation</li> <li>• Industry</li> <li>• Recreational groups</li> <li>• Environmental groups</li> <li>• Federated Farmers</li> <li>• Others who may have a particular contribution to make to the workings of the WMC.</li> </ul>	This is noted. The WMC has collaborated with numerous external parties, such as those listed in this condition.

Clause No.	Condition	Compliance Review June 2020
Clause 16	<p>The functions of the WMC shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Monitoring the implementation and commissioning of the Wastewater Treatment Plant (WWTP) including the development of a WWTP operating manual.</li> <li>• Monitoring the BTF Plant Monitoring and Investigation Study.</li> <li>• Monitoring AUD research.</li> <li>• Recommending AUD trials.</li> <li>• Monitoring the AUD trials.</li> <li>• Recommending AUD implementation.</li> <li>• Monitoring compliance with permit conditions and separated industry wastewater standards.</li> <li>• Ensuring the development of appropriate educational information to encourage reductions in domestic and industrial wastewater.</li> <li>• Ensuring the development of appropriate educational information to encourage AUD.</li> <li>• Developing and administering the Turanganui A Kiwa Water Quality Enhancement Project.</li> <li>• Recommending the membership of and receiving reports from the INDEPENDENT REVIEW PANEL.</li> <li>• Providing an annual report on the exercise of its activities and functions, including where appropriate a report on the effectiveness of measures undertaken by the Turanganui A Kiwa Water Quality Enhancement Project. This report shall be provided to the Chief Executive of the Gisborne District Council during the month of June of each year for the duration of this permit.</li> </ul>	<p>The WMC has not provided annual reports every year, but has provided updates through Council staff papers as required</p> <ul style="list-style-type: none"> <li>• AUD work plan has been drafted to support available budget. Yet to be implemented</li> <li>• Council has remained compliant with its discharges but transgression with some trade waste agreements has occurred. Council is working with those industries to ensure compliance.</li> <li>• AUD options is being pursued with Industry as part of their Waste Management.</li> <li>• Turanganui A Kiwa Water Quality Enhancement Project are operating under an agreed work plan with WMC. Annual Report provided.</li> </ul>
Clause 17	The WMC shall be convened by the permit holder and shall meet four times annually until 31 December 2015 2020 and thereafter at least twice a year for the remainder of the duration of the permit, or as determined by the WMC.	The WMC have met at least four times per year.
<b>Turanganui a Kiwa Water Quality Enhancement Project</b>		
Clause 18	The permit holder shall establish, administer, retain and be responsible for the Turanganui A Kiwa Water Quality Enhancement Project within three months of the issue of this permit, or as soon as practical thereafter.	Regular updates have been provided by the KIWA group.
Clause 19	The project shall be defined and developed by the WMC as a vehicle for integrated research, monitoring, planning and specific projects that will aim to improve the mauri and the water quality of Turanganui A Kiwa.	An Independent Review Panel has reviewed this and have given a report.

Clause No.	Condition	Compliance Review June 2020
Clause 20	Removed by Variation of Consent Conditions, June 2009.	This consent condition was removed by the variation, so compliance no longer required.
<b>Independent Review Panel</b>		
Clause 21	The permit holder shall appoint an Independent Review Panel to undertake reviews as set out in condition 22 and report to the WMC. The Independent Review Panel shall comprise two to four members, depending on the subject of the particular review. Independent Review Panel members shall have expertise of direct relevance to the subject of the review and shall generally include one person with expertise in wastewater management, including treatment, and one person with expertise in resource management. For reviews undertaken in accordance with condition 22 (d) and (e), the Independent Review Panel shall include a person with expertise in kaupapa Maori.	The appointment of an Independent Review Panel in 2012 was not done but was done in 2018
<b>Reviews to be Undertaken</b>		
Clause 22	<p>The permit holder shall ensure the following reviews are undertaken:</p> <p>a) Review of industrial wastewater discharges in terms of condition 10;</p> <p>b) Review of progress of:</p> <ul style="list-style-type: none"> <li>• the wastewater upgrade, including pre-tender reviews for the Single BTF Plant, Wastewater Disinfection, and additional plant requirements if any, that are recommended by the WTAG in their 3rd Annual Report in 2013;</li> <li>• the Odour Management Plan; and</li> <li>• performance reviews of the WWTP one year after the commissioning of the initial BTF and one year after the commissioning of the disinfection system (if installed pursuant to Clauses 4 (e) or (f)).</li> </ul> <p>c) Review of the AUD Programme one year after it is initiated in 2012 and in 2018, or as otherwise determined by the permit holder, taking into account recommendations from the WMC.</p> <p>d) Six yearly reviews, co-ordinated with the timing of the Long Term Council Community Plan (LTCCP) reviews, starting in 2012 or as otherwise necessary to suit LTCCP timeframes. The purposes of the six yearly reviews shall include to the extent appropriate, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Review of progress in relation to sewer network improvement works as required by condition 2. Review of monitoring and compliance of the coastal permit.</li> </ul>	<p>This is part of the Independent Review Panel Report.</p> <p>a) Undertaken annually as part of renewing individual trade waste agreements and incorporate into their waste management plans</p> <p>b) Disinfection being implemented Odour management plan has been updated to include plant extension for disinfection</p> <p>c) AUD work plan has been developed, yet to be implemented</p> <p>d) A review was undertaken by BECA to check actual flow performance. This confirmed flow requirements are being meet. Consent conditions changes not pursued Quality Enhancement Project, work plan updated</p>

Clause No.	Condition	Compliance Review June 2020
	<ul style="list-style-type: none"> <li>• Review and recommend any necessary changes to consent conditions.</li> <li>• Review of the BTF Plant Monitoring and Investigation study as per 22 b).</li> <li>• Review and recommend any necessary changes to the Turanganui A Kiwa Water Quality Enhancement Project.</li> <li>• Recommend additional experts and any necessary changes to the functions of the INDEPENDENT REVIEW PANEL.</li> <li>• Address any other matters identified by the WMC as requiring review.</li> <li>• Adequacy of spares kept in store in Gisborne to ensure the wastewater treatment plant can be maintained in full operating condition at all times, except during normal maintenance and replacement of spares.</li> </ul> <p>e) Review the recommendations of the BTF Plant Monitoring and Investigation Study.</p>	<p>Review of critical spares completed annually</p> <p>e) Completed</p>
Clause 23	The Independent Review Panel may consult with parties it considers can provide information that may assist the review process, subject to the approval of the WMC.	This is noted.
Clause 24	The Independent Review Panel shall report to the WMC within one month of the completion of each review, and send a copy to the permit holder and to the consent authority and the Minister of Conservation.	The Independent Review Panel reviewed this consent in 2018 and the report was accepted as draft in May 2020. The action items are currently being reviewed to allow the report to be finalised.
<b>General Review Clause</b>		
Clause 25	The consent authority may review the conditions of this permit by serving notice of its intention to do so on the permit holder pursuant to section 128 and section 129 of the RMA in the month of June at yearly intervals for the duration of the permit.	This is a standard review clause for noting only.
Clause 26	<p>There shall be general reviews undertaken by the consent authority of the consent conditions as follows:</p> <p>(a) Review conditions in clauses 4, 37, 41, 42, 43, 44 and 45 of this permit by serving notice of its intention to do so on the permit holder pursuant to section 128 and section 129 of the RMA. The review will be notified to all submitters to consent applications CP20516, CP205017, CP205018, CP205019, CP205020, CP205021, CP205022, CP205023 and CP205024.</p>	This condition allows for General Review. No General reviews have been undertaken.

Clause No.	Condition	Compliance Review June 2020
	<p>(b) To require the permit holder to adopt the best practicable option to remove or reduce any adverse effect on the environment resulting from the discharge.</p> <p>(c) To modify the monitoring programme if the record of monitoring to date indicates that it is appropriate to do so, including in order to meet the environmental outcomes required of the permit.</p> <p>(d) To deal with any adverse effect on the environment which may arise from inadequate biotransformation of waste.</p> <p>(e) To implement, as appropriate, recommendations of the WTAG contained in its BTF Monitoring and Investigation Study Report.</p> <p>(f) To require amendments to plant configuration (including the number of BTF filters) necessary to achieve appropriate levels of biotransformation, where the review indicates the level of biotransformation being achieved is not what could be expected in terms of considerations of Part II of the RMA.</p> <p>(g) To review the appropriateness of conditions if there are changes to relevant national standards, regulations and guidelines, and the Council's relevant regional and district level plans.</p> <p>(h) To consider any new technological changes in assessing micro-organisms where relevant to monitoring of the WWTP and the receiving environment.</p> <p>(i) To assess the Single BTF Plant and Wastewater Disinfection and the need for the Preferred Long-term Management Option.</p> <p>(j) To consider any unreasonable delays in the investigation and consenting process of alternative treatment options and to determine alternative timeframes for the implementation and commissioning of alternative treatment options. The review of conditions shall allow for:</p> <ul style="list-style-type: none"> <li>• The deletion or amendment of any of the conditions of these consents; and/or</li> <li>• The addition of new conditions as necessary to avoid, remedy or mitigate any adverse effects on the environment, including any unforeseen adverse environmental effects and to take into account recommendations of the WMC.</li> </ul> <p>Actual and reasonable costs associated with the undertaking of each review shall be borne by the permit holder.</p>	

Clause No.	Condition	Compliance Review June 2020
<b>Specific Review Clause</b>		
Clause 27	<p>The consent authority shall may review conditions of this permit by serving notice of its intention to do so on the permit holder pursuant to section 128 and section 129 of the RMA during the month of June 2015, 2016 and June 2021, 2020 to review the following specific matters:</p> <p>(a) To review progress in relation to condition 2, and in particular to consider the report from the Independent Review Panel required under condition 22 (d) and to set a date for completion of any outstanding works.</p> <p>(b) To review progress in relation to AUD as set out in conditions 5 to 8 and to require the permit holder to undertake such other work identified by the Independent Review Panel in accordance with condition 22 (c) and accepted as appropriate by the WMC as being reasonably necessary to satisfy the “best endeavours” requirements of condition 8.</p> <p>(c) To review, in 2018, the “Best Practicable Option” based on the outcomes of the AUD Trials and the requirements of the RMA and to determine what changes to the conditions of this consent, if any, are required.</p> <p>(d) To implement, as appropriate, recommendations of the WTAG contained in its BTF Plant Monitoring and Investigation Study report.</p> <p>(e) To require amendments to plant configuration (including the number of BTFs) necessary to achieve appropriate levels of biotransformation, consistent with achieving the RMA’s purpose.</p>	This condition allows for Specific Review. No Specific Reviews have been undertaken.
<b>Term of Consents</b>		
Clause 28	The Term of Consents is 35 years from 2007 when the consents were granted. Note: CP-2008-1208-01 and CP-2008-1210-01 expire 21 September 2042 CP-20081202-01 to CP-2008-1207-01 (inclusive) and CP-2008-1209-01 expire 2 July 2042.	The expiry date is July 2042.
<b>Specific Conditions CP-2008-1208-01 (ex CP205022)</b>		
Clause 29	This permit shall be carried out in accordance with the consent application and supporting documentation except to the extent that these are required to be modified to comply with the terms and conditions of the permit.	This clause is a repeat of Clause 1. From Clause 1 - The activity is considered to currently be operating in accordance with the consent application.
Clause 30	The conditions of this permit shall be read in conjunction with the conditions of the designations from the Notices of Requirement for Designation, PZ-103653-00 and the conditions of consents: DA-103680-00, CP-1202-01, CP-1203-01, CP-1204-01, CP-1205-01, CP-1206-01, CP-1207-01, CP-1208-01, CP-1209-01 and CP-1210-01.	The consents are holistically viewed with regard to conditions and management plans.

Clause No.	Condition	Compliance Review June 2020																
<b>Discharge to Outfall Monitoring Up Until Single BTF Plant Commissioning</b>																		
Clause 31	The permit holder shall install and operate at a point beyond the existing milliscreens, at Location 4 in Figure 2, such systems and measuring devices as are necessary, to monitor, analyse and record wastewater discharge in cubic metres per second for maximum and average daily flow rates from the discharge point.	Until the installation of the BTF in 2010, monitoring was undertaken at location 4. This condition has been superseded with the installation of the BTF.																
Clause 32	The permit holder shall sample, analyse and record from a composite flow proportional sample the following from the wastewater discharge beyond the existing milliscreens, at Location 4:- (i) Floatable oil and grease in terms of g/m <sup>3</sup> and kg/day. (ii) Total oil and grease in g/m <sup>3</sup> and kg/day. (iii) Suspended solids in g/m <sup>3</sup> and kg/day. (iv) 5-day carbonaceous BOD and COD in g/m <sup>3</sup> and kg/day. (v) Particles retained by a 1-mm x 25 mm screen in g/m <sup>3</sup> and kg/day. (vi) Particles retained by a 1-mm 2-dimensional sieve in g/m <sup>3</sup> and kg/day (vii) Enterococci in cfu/100 ml.	The monitoring is undertaken weekly and the results are held in the Council water quality database named Hilltop.																
Clause 33	Based upon weekly sampling taken thereafter until Single BTF Commissioning, at Location 4: (i) There shall be no particles retained on a test section of a 1 mm screen; and ( (ii) The following standards shall be met: <table border="1" data-bbox="465 922 1227 1184"> <thead> <tr> <th>Parameter</th> <th>Sample Type</th> <th>Concentration Limit (g/m<sup>3</sup>)</th> <th>Mass Load Limit (kg/day)</th> </tr> </thead> <tbody> <tr> <td>Total Oil and Grease</td> <td>Composite</td> <td>60</td> <td>1080</td> </tr> <tr> <td>Floatable Oil and Grease</td> <td>Composite</td> <td>20</td> <td>360</td> </tr> <tr> <td>Suspended Solids</td> <td>Composite</td> <td>900</td> <td>16,200</td> </tr> </tbody> </table> Until Wastewater Disinfection commissioning of Preferred Long-Term Management Option Suspended Solids Composite 600 10,800 After Wastewater Disinfection Preferred Long-Term Management Option commissioning Compliance with the concentration and mass load based limits shall be determined on the basis of there being no more than 3 exceedances of the concentration and mass load limits in any discrete period of 26 consecutive samples.	Parameter	Sample Type	Concentration Limit (g/m <sup>3</sup> )	Mass Load Limit (kg/day)	Total Oil and Grease	Composite	60	1080	Floatable Oil and Grease	Composite	20	360	Suspended Solids	Composite	900	16,200	This is held in the Council Hilltop water quality database. Council has had some technical difficulties accessing this data, which it is working on. The first part of this condition has been superseded with the installation of the BTF. The second part of this condition will not come into effect until the Preferred Long-Term Management Option has been commissioned. During 2019-2020 Total Suspended Solids was tested 58 times with 4 being over 600g/m <sup>3</sup> . The highest was 880g/m <sup>3</sup> . These were spread out over the year so there was no more than 3 exceedances within 26 samples.
Parameter	Sample Type	Concentration Limit (g/m <sup>3</sup> )	Mass Load Limit (kg/day)															
Total Oil and Grease	Composite	60	1080															
Floatable Oil and Grease	Composite	20	360															
Suspended Solids	Composite	900	16,200															

Clause No.	Condition	Compliance Review June 2020
Clause 34	Once every three months separate 'grab' samples shall be taken from Location 4, on a randomly selected day and the same day in that week as the flow proportional sample and analysed for the following parameters: ☐ Suspended Solids ☐ Total Oil and Grease ☐ Floatable Oil and Grease ☐ 5-day carbonaceous BOD These 'grab' samples shall be taken at 1100 and 1500 NZST.	These samples are being taken on a three-monthly basis There were 12 grab samples for each parameter in the 2019-2020 year. All Total suspended solids, Total Oil and Grease, Floatable Oil and Grease, were compliant.
<b>Wastewater Treatment Plant Monitoring Subsequent to Single BTF Plant Commissioning and up Until Wastewater Disinfection commissioning of Preferred Long-Term Management Option.</b>		
Clause 35	<p>(a) The permit holder shall install and operate such systems and measuring devices as are necessary to monitor, analyse and record wastewater discharge in cubic metres per second for maximum and average daily flow rates from the following discharge points:</p> <p>(i) Immediately after the discharge leaves the WWTP and prior to it mixing with the industrial flow, at Location 2.</p> <p>(ii) The industrial flow prior to mixing with the discharge from the BTF, at Location 3.</p> <p>(b) The permit holder shall install and operate such systems and measuring devices as are necessary to monitor, analyse and record wastewater BOD (soluble and total) and suspended solids (volatile and total) characteristics from influent immediately prior to the BTF, at Location 1.</p> <p><u>Advice Note</u> The total discharge flow shall be calculated by adding the flows at Location 2 (Clause 35 (a) (i)) and Location 3 (Clause 35 (a) (ii)), see Figure 2 for Locations 2 and 3.</p>	The flow monitoring has been installed and data is entered into Hilltop. Auto-samplers are installed to allow samples to be taken for measurement.
Clause 36	<p>The permit holder shall sample, analyse and record from a composite flow proportional sample the following parameters from the wastewater discharge at:</p> <p>(a) Location 1 and Location 2 for:-</p> <p>(i) Floatable oil and grease in terms of g/m<sup>3</sup> and kg/day.</p> <p>(ii) Total oil and grease in g/m<sup>3</sup> and kg/day.</p> <p>(iii) Suspended solids in g/m<sup>3</sup> and kg/day.</p> <p>(iv) 5-day carbonaceous BOD and COD in g/m<sup>3</sup> and kg/day. (v) Enterococci in cfu/100 ml (by 'grab' sample, not composite flow proportional sample)</p> <p>(vi) Further parameters as agreed in the BTF Plant Monitoring and Investigation Study.</p>	Initially the sampling was time-based. On review, the sampling was changed to flow-proportional sampling. The screen and sieve test were carried out until the amendment in 2014. Up to this date, nothing was retained on the screen or sieve. Enterococci sampling until the 2014 amendment was taken with the 24 hour sample. Best practise is

Clause No.	Condition	Compliance Review June 2020									
	<p>(b) Location 3 for:</p> <ul style="list-style-type: none"> <li>(i) Floatable oil and grease in terms of g/m<sup>3</sup> and kg/day.</li> <li>(ii) Total oil and grease in g/m<sup>3</sup> and kg/day.</li> <li>(iii) Suspended solids in g/m<sup>3</sup> and kg/day.</li> <li>(iv) 5-day carbonaceous BOD and COD in g/m<sup>3</sup> and kg/day.</li> <li>(v) Enterococci in cfu/100 ml (by 'grab' sample, not composite flow proportional sample)</li> </ul> <p>(c) Location 4 for:</p> <ul style="list-style-type: none"> <li>(i) Floatable oil and grease in terms of g/m<sup>3</sup> and kg/day.</li> <li>(ii) Total oil and grease in g/m<sup>3</sup> and kg/day.</li> <li>(iv) Suspended solids in g/m<sup>3</sup> and kg/day.</li> <li>(iv) 5-day carbonaceous BOD and COD in g/m<sup>3</sup> and kg/day. (v) Enterococci in cfu/100 ml (by 'grab' sample, not composite flow proportional sample)</li> </ul>	<p>to take microbiological samples by 'grab' samples, this was changed in the 2014 amendment.</p> <p>There were 55 samples taken at each location for each parameter.</p> <p>The results as they become available are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>									
Clause 37	<p>This condition is to be implemented only if required as set out in condition 4A (c) (iv). The permit holder shall sample, analyse and record BOD in g/m<sup>3</sup> and kg/day prior to the initial BTF at Location 1. Based on the results of analyses of weekly sampling the annual average daily loading of the BOD on the BTF or BTFs shall not exceed 0.4 kg per cubic metre of media.</p>	<p>No changes to clause 37, 42 and 43 were recommended by the WTAG in their third annual report (2014), pending conclusion to investigative work being undertaken yet not sufficiently advanced to formulate recommendations for change.</p>									
Clause 38	<p>Based upon twice weekly sampling, taken over the first six months after the Single BTF Plant Commissioning and weekly sampling thereafter until 31 December 2012, all industrial wastewater discharged at Location 3, shall meet the following standards:</p> <table border="1" data-bbox="463 1038 1167 1193"> <thead> <tr> <th><u>Parameter</u></th> <th><u>Sample Type</u> <u>Limit</u></th> <th><u>Concentration</u></th> </tr> </thead> <tbody> <tr> <td>Suspended Solids</td> <td>Composite</td> <td>600 g/m<sup>3</sup></td> </tr> <tr> <td>Total Oil and Grease</td> <td>Composite</td> <td>60 g/m<sup>3</sup></td> </tr> </tbody> </table> <p>Compliance with the concentration and mass load based limits shall be determined on the basis of there being no more than 3 exceedances of the concentration and mass load limits in any discrete period of 26 consecutive samples.</p> <p>All other parameters in condition 36 (b) shall also be sampled at the same frequency.</p>	<u>Parameter</u>	<u>Sample Type</u> <u>Limit</u>	<u>Concentration</u>	Suspended Solids	Composite	600 g/m <sup>3</sup>	Total Oil and Grease	Composite	60 g/m <sup>3</sup>	<p>Compliance was required until 31 December 2012. Currently there is no limit, this will change once the Wastewater Treatment Plant Upgrade has been commissioned.</p>
<u>Parameter</u>	<u>Sample Type</u> <u>Limit</u>	<u>Concentration</u>									
Suspended Solids	Composite	600 g/m <sup>3</sup>									
Total Oil and Grease	Composite	60 g/m <sup>3</sup>									

Clause No.	Condition	Compliance Review June 2020
<b>Grab Samples</b>		
Clause 39	<p>Once every three months separate 'grab' samples shall be taken from monitoring points at Location 2 and Location 3 on a randomly selected day of the week and the same day in that week as the flow proportional sample and analysed for the following parameters:</p> <ul style="list-style-type: none"> <li>• Suspended Solids</li> <li>• Total Oil and Grease</li> <li>• Floatable Oil and Grease</li> <li>• 5 day carbonaceous BOD</li> </ul> <p>These 'grab' samples shall be taken at 1100 and 1500 NZST.</p>	<p>These samples are being taken on a three-monthly basis. There were 12 samples taken at each location for all parameters.</p> <p>The results as they become available are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>
<b>Subsequent to wastewater disinfection commissioning of Preferred Long-Term Management Option and for the Remaining Duration of the Permit</b>		
Clause 40	The permit holder shall continue to operate such systems and measuring devices as are necessary, to monitor, analyse and record wastewater discharge in cubic metres per second for maximum and average daily flow rates from Location 2 and Location 3.	The flow monitoring is installed. The information prior to 2018 is kept on Hilltop, post 2018, the information is accessible via the SCADA historian system. The information is kept on the Council server.
Clause 41	<p>(a) The permit holder shall sample, analyse and record from a composite flow proportional sample the following from the wastewater discharge at Location 2 and Location 3: (i)</p> <ul style="list-style-type: none"> <li>(i) Floatable oil and grease in terms of g/m<sup>3</sup> and kg/day.</li> <li>(ii) Total oil and grease in g/m<sup>3</sup> and kg/day.</li> <li>(iii) Suspended solids in g/m<sup>3</sup> and kg/day.</li> <li>(iv) 5-day BOD or COD equivalent in g/m<sup>3</sup> and kg/day.</li> <li>(iv) Enterococci in cfu/100 ml (by 'grab' sample, not composite flow proportional sample)</li> </ul> <p>And immediately beyond the milliscreens:</p> <p>(b) The permit holder shall maintain and operate such systems and measuring devices as necessary to sample, analyse and record the following parameter from the wastewater at Location 1 for :-</p> <ul style="list-style-type: none"> <li>(i) BOD in g/m<sup>3</sup> and kg/day.</li> </ul>	<p>These samples are being taken on a weekly basis. There were 55 samples taken in the 2019-2020 year.</p> <p>The results as they become available are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>

Clause No.	Condition	Compliance Review June 2020						
Clause 42	<p>Stipulates enterococci limit on wastewater discharge to Poverty Bay.</p> <p>Enterococci shall be sampled on a daily basis for the first 100 days immediately subsequent to wastewater disinfection commissioning of Preferred Long-Term Management Option and thereafter at weekly intervals for the duration of this permit. The discharge shall meet the following standards:</p> <table border="1" data-bbox="463 411 1142 518"> <thead> <tr> <th><u>Parameter</u></th> <th><u>Sample Type</u> <u>sample</u></th> <th><u>Parameter limit as cfu/100 ml</u></th> </tr> </thead> <tbody> <tr> <td>Enterococci</td> <td>Grab</td> <td>1000</td> </tr> </tbody> </table> <p>Compliance with this condition shall initially be determined on the basis of there being no more than 8 exceedances of the specified number limit within the initial 100 day period of operation and, thereafter no more than 3 exceedances of the concentration based limit in any discrete period of 26 consecutive samples</p>	<u>Parameter</u>	<u>Sample Type</u> <u>sample</u>	<u>Parameter limit as cfu/100 ml</u>	Enterococci	Grab	1000	This clause is yet to take effect.
<u>Parameter</u>	<u>Sample Type</u> <u>sample</u>	<u>Parameter limit as cfu/100 ml</u>						
Enterococci	Grab	1000						
Clause 43	<p>This condition is to be implemented only if required as set out in condition 4A (c) (iv).</p> <p>Based upon weekly sampling after wastewater disinfection commissioning of Preferred Long-Term Management Option from a composite flow proportional sample taken over a period of 24 hours on a randomly selected day of the week for the term of the permit, all wastewater discharged beyond the wastewater treatment plant at Location 2 shall meet the following standards:</p> <table border="1" data-bbox="463 874 1220 1013"> <thead> <tr> <th><u>Parameter</u></th> <th><u>Sample Type</u> <u>Concentration Limit</u></th> <th><u>Parameter Limit</u> Suspended Solids Composite</th> </tr> </thead> <tbody> <tr> <td>Total Oil and Grease</td> <td>Composite</td> <td>10 g/m3</td> </tr> </tbody> </table> <p>Compliance with the concentration based limits shall be determined on the basis of there being no more than 16 exceedances of the concentration limit in any discrete period of 26 consecutive samples.</p>	<u>Parameter</u>	<u>Sample Type</u> <u>Concentration Limit</u>	<u>Parameter Limit</u> Suspended Solids Composite	Total Oil and Grease	Composite	10 g/m3	No changes to clause 37, 42 and 43 were recommended by the WTAG in their third annual report (2014), pending conclusion to investigative work being undertaken yet not sufficiently advanced to formulate recommendations for change.
<u>Parameter</u>	<u>Sample Type</u> <u>Concentration Limit</u>	<u>Parameter Limit</u> Suspended Solids Composite						
Total Oil and Grease	Composite	10 g/m3						
Clause 44	<p>Stipulates enterococci limit on separated industrial wastewater stream</p> <p>Based upon daily sampling immediately subsequent to wastewater disinfection commissioning of the Preferred Long-Term Management Option for the first 100 days and sampling weekly thereafter, all industrial wastewater discharged at Location 3 shall meet the following standards:</p> <table border="1" data-bbox="463 1273 1153 1380"> <thead> <tr> <th><u>Parameter</u></th> <th><u>Sample Type</u> <u>Sample</u></th> <th><u>Parameter limit (as cfu/100 ml)</u></th> </tr> </thead> <tbody> <tr> <td>Enterococci</td> <td>Grab</td> <td>1000</td> </tr> </tbody> </table>	<u>Parameter</u>	<u>Sample Type</u> <u>Sample</u>	<u>Parameter limit (as cfu/100 ml)</u>	Enterococci	Grab	1000	This clause is yet to take effect.
<u>Parameter</u>	<u>Sample Type</u> <u>Sample</u>	<u>Parameter limit (as cfu/100 ml)</u>						
Enterococci	Grab	1000						

Clause No.	Condition	Compliance Review June 2020									
	Compliance with this condition shall initially be determined on the basis of there being no more than 8 exceedances of the specified number within the initial 100 day period of operation and, thereafter no more than 3 exceedances of the concentration based limit in any discrete period of 26 consecutive samples										
Clause 45	<p>Based upon twice weekly sampling for 6 months subsequent to installation of wastewater disinfection of the Preferred Long-Term Management Option and sampling weekly thereafter for the term of the consent, all industrial wastewater discharged at Location 3 shall meet the following standards:</p> <table border="0" data-bbox="465 507 1469 614"> <thead> <tr> <th data-bbox="465 507 728 534"><u>Parameter</u></th> <th data-bbox="728 507 907 534"><u>Sample Type</u></th> <th data-bbox="907 507 1469 534"><u>Concentration Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="465 534 728 582">Suspended Solids</td> <td data-bbox="728 534 907 582">Composite</td> <td data-bbox="907 534 1469 582">600 g/m<sup>3</sup></td> </tr> <tr> <td data-bbox="465 582 728 614">Total Oil and Grease</td> <td data-bbox="728 582 907 614">Composite</td> <td data-bbox="907 582 1469 614">60 g/m<sup>3</sup></td> </tr> </tbody> </table> <p>Compliance with the concentration and mass load based limits shall be determined on the basis of there being no more than 3 exceedances of the concentration and mass load limits in any discrete period of 26 consecutive samples.</p>	<u>Parameter</u>	<u>Sample Type</u>	<u>Concentration Limit</u>	Suspended Solids	Composite	600 g/m <sup>3</sup>	Total Oil and Grease	Composite	60 g/m <sup>3</sup>	This clause is yet to take effect.
<u>Parameter</u>	<u>Sample Type</u>	<u>Concentration Limit</u>									
Suspended Solids	Composite	600 g/m <sup>3</sup>									
Total Oil and Grease	Composite	60 g/m <sup>3</sup>									
<b>Plume Monitoring</b>											
Clause 46	<p>The permit holder shall collect samples at hourly intervals from the wastewater beyond the existing milliscreens (Location 4) and store these samples for a minimum of 24 hours. If a “conspicuous” plume or slick attributable to the outfall discharge is identified (by a suitably trained person), sample analysis for suspended solids and total oil and grease shall be carried out on those samples coinciding with the observance of the “conspicuous” plume or slick. After 24 hours subsequent to samples being collected, samples not required for sample analysis may be discarded.</p> <p>The permit holder shall inform the consent authority within 24 hours of a “conspicuous” plume or slick being identified and samples being analysed and shall provide the sample analysis results within 10 working days of the samples being collected.</p> <p>This condition shall apply until Single BTF Plant Commissioning or an approved methodology as described in condition 47 is in place.</p>	This clause has been superseded with the installation of the BTF.									
Clause 47	The permit holder shall provide a methodology to the approval of the consent authority, within 24 months from the date of issue of the consent, to investigate the possible relationship between the occurrence of a conspicuous plume or slick, as identified by the relevant authority, and the concentrations of suspended solids and oil and grease in the discharge, as referred to in condition 46.	This study was undertaken but no relationship was found.									

Clause No.	Condition	Compliance Review June 2020																		
<b>Grab Samples</b>																				
Clause 48	<p>Once every three months separate 'grab' samples shall be taken from monitoring points at Location 2 and Location 3, on a randomly selected day and the same day in that week as the flow proportional sample and analysed for the following parameters:</p> <ul style="list-style-type: none"> <li>• Suspended Solids</li> <li>• Total Oil and Grease</li> <li>• Floatable Oil and Grease</li> <li>• 5-day carbonaceous BOD</li> </ul> <p>These 'grab' samples shall be taken at 1100 and 1500 NZST.</p>	These samples are being taken on a three-monthly basis. There were 12 samples taken from each location for each parameter.																		
<b>Additional Monitoring For The Duration Of This Permit Heavy Metals &amp; Organic Compounds</b>																				
Clause 49	<p>The permit holder shall carry out heavy metal and organic compound analysis of the combined wastewater stream, at Location 4, at intervals not exceeding six months for heavy metals and not exceeding 12 months for organic compounds, or at such other occasions that the consent authority considers circumstances so require or as required by the WMC. A copy of each analysis report shall be forwarded to the consent authority within 30 days of samples being collected. The following parameters are to be tested for:-</p> <table border="0" data-bbox="465 978 1025 1300"> <thead> <tr> <th style="text-align: left;">Parameter(s)</th> <th style="text-align: left;">Units</th> </tr> </thead> <tbody> <tr> <td>Cadmium</td> <td>g/m3, g/d</td> </tr> <tr> <td>Chromium</td> <td>g/m3, g/d</td> </tr> <tr> <td>Copper</td> <td>g/m3, g/d</td> </tr> <tr> <td>Lead</td> <td>g/m3, g/d</td> </tr> <tr> <td>Mercury</td> <td>g/m3, g/d</td> </tr> <tr> <td>Zinc</td> <td>g/m3, g/d</td> </tr> <tr> <td>Semi Volatile Organic Compounds</td> <td>g/m3, g/d</td> </tr> <tr> <td>Volatile Organic Compounds</td> <td>g/m3, g/d</td> </tr> </tbody> </table> <p>The sample is to be taken from a 24-hour flow proportional composite sample and the results are to be given in both g/m3 and g/day.</p>	Parameter(s)	Units	Cadmium	g/m3, g/d	Chromium	g/m3, g/d	Copper	g/m3, g/d	Lead	g/m3, g/d	Mercury	g/m3, g/d	Zinc	g/m3, g/d	Semi Volatile Organic Compounds	g/m3, g/d	Volatile Organic Compounds	g/m3, g/d	<p>These samples are being taken at a six month frequency for heavy metals and annually for organic compounds</p> <p>The results are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>
Parameter(s)	Units																			
Cadmium	g/m3, g/d																			
Chromium	g/m3, g/d																			
Copper	g/m3, g/d																			
Lead	g/m3, g/d																			
Mercury	g/m3, g/d																			
Zinc	g/m3, g/d																			
Semi Volatile Organic Compounds	g/m3, g/d																			
Volatile Organic Compounds	g/m3, g/d																			

Clause No.	Condition	Compliance Review June 2020														
Clause 50	<p>The levels of heavy metals in the combined wastewater stream shall not be greater than:</p> <table border="0" data-bbox="463 300 1086 564"> <thead> <tr> <th data-bbox="463 300 824 328">Parameter(s)</th> <th data-bbox="824 300 1086 328">Parameter Limits (g/m3)</th> </tr> </thead> <tbody> <tr> <td data-bbox="463 336 824 365">Cadmium</td> <td data-bbox="824 336 1086 365">0.8 g/m3</td> </tr> <tr> <td data-bbox="463 373 824 402">Chromium</td> <td data-bbox="824 373 1086 402">2.0 g/m3</td> </tr> <tr> <td data-bbox="463 410 824 438">Copper</td> <td data-bbox="824 410 1086 438">0.2 g/m3</td> </tr> <tr> <td data-bbox="463 446 824 475">Lead</td> <td data-bbox="824 446 1086 475">0.2 g/m3</td> </tr> <tr> <td data-bbox="463 483 824 512">Mercury</td> <td data-bbox="824 483 1086 512">0.004 g/m3</td> </tr> <tr> <td data-bbox="463 520 824 549">Zinc</td> <td data-bbox="824 520 1086 549">2.0 g/m3</td> </tr> </tbody> </table> <p>If on any sampling occasion, any sample exceeds any of the above limits, the permit holder shall resample the discharge for the non-compliant parameter as soon as practical after the exceedance is found, notify the consent authority as soon as possible and as a maximum within 24 hours and shall carry out investigations into the likely cause of that exceedance. The permit holder shall forward an investigation report to the consent authority within 30 days of that sampling occasion.</p>	Parameter(s)	Parameter Limits (g/m3)	Cadmium	0.8 g/m3	Chromium	2.0 g/m3	Copper	0.2 g/m3	Lead	0.2 g/m3	Mercury	0.004 g/m3	Zinc	2.0 g/m3	<p>The samples taken for these parameters have all been within the limits for the entirety of the consent period to date.</p> <p>The results are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>
Parameter(s)	Parameter Limits (g/m3)															
Cadmium	0.8 g/m3															
Chromium	2.0 g/m3															
Copper	0.2 g/m3															
Lead	0.2 g/m3															
Mercury	0.004 g/m3															
Zinc	2.0 g/m3															
<b>Nutrients</b>																
Clause 51	<p>The permit holder shall monitor the combined wastewater stream at Location 4 for the following nutrients:</p> <table border="0" data-bbox="463 895 891 1145"> <thead> <tr> <th data-bbox="463 895 824 924"><u>Nitrogen</u></th> <th data-bbox="824 895 891 924"><u>Units</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="463 932 824 960">Total Kjeldahl Nitrogen</td> <td data-bbox="824 932 891 960">g/m3</td> </tr> <tr> <td data-bbox="463 968 824 997">Ammonium Nitrogen</td> <td data-bbox="824 968 891 997">g/m3</td> </tr> <tr> <td data-bbox="463 1005 824 1034">Nitrate Nitrogen</td> <td data-bbox="824 1005 891 1034">g/m3</td> </tr> <tr> <td data-bbox="463 1042 824 1070">Dissolved Inorganic Nitrogen</td> <td data-bbox="824 1042 891 1070">g/m3</td> </tr> <tr> <td colspan="2" data-bbox="463 1078 891 1107"><u>Phosphorus</u></td> </tr> <tr> <td data-bbox="463 1115 824 1144">Total Phosphorus</td> <td data-bbox="824 1115 891 1144">g/m3</td> </tr> </tbody> </table> <p>The permit holder shall carry out nutrient analysis for nitrogen compounds, as outlined above and phosphorus from the combined wastewater stream at intervals not exceeding 3 months or at such other occasions when the consent authority considers circumstances so require. A copy of each analysis report shall be forwarded to the consent authority within 30 days of samples being collected.</p> <p>The samples shall be taken from a 24-hour flow proportional composite sample and results provided in both grams per cubic metre (g/m3) and kilograms per day (kg/d).</p>	<u>Nitrogen</u>	<u>Units</u>	Total Kjeldahl Nitrogen	g/m3	Ammonium Nitrogen	g/m3	Nitrate Nitrogen	g/m3	Dissolved Inorganic Nitrogen	g/m3	<u>Phosphorus</u>		Total Phosphorus	g/m3	<p>These samples are being taken on a three-monthly basis. There were 4 samples taken at location 4 for each parameter.</p> <p>The results as they become available are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>
<u>Nitrogen</u>	<u>Units</u>															
Total Kjeldahl Nitrogen	g/m3															
Ammonium Nitrogen	g/m3															
Nitrate Nitrogen	g/m3															
Dissolved Inorganic Nitrogen	g/m3															
<u>Phosphorus</u>																
Total Phosphorus	g/m3															

Clause No.	Condition	Compliance Review June 2020
<b>Pathogens</b>		
Clause 52	<p>The permit holder shall sample, analyse and record the following from wastewater samples taken at Location 2 and Location 3:</p> <ul style="list-style-type: none"> <li>(i) Bacteria, sample for the species Salmonella and Campylobacter.</li> <li>(ii) Viruses, sample for human enterovirus and adenovirus.</li> <li>(iii) Protozoa, sample for the species Giardia and Cryptosporidium.</li> <li>(iv) Sample for Enterococci.</li> </ul>	<p>Samples are being tested for these pathogens.</p> <p>The results as they become available are forwarded from the laboratory into Hilltop for viewing by the regulatory and Wastewater Treatment Plant staff.</p>
Clause 53	<p>Subsequent to and within one month of Single BTF Plant Commissioning the wastewater discharge shall be sampled at the locations and for the species outlined in conditions 52 (i), (ii), (iii) and (iv). Monitoring shall continue at six monthly intervals for two years and annually thereafter until superseded by condition 54.</p>	<p>The sampling frequency was done as required by the consent and is now on an annual basis.</p>
Clause 54	<p>Subsequent to and within one month of wastewater disinfection commissioning of the Preferred Long-Term Management Option, including ultraviolet disinfection, the wastewater discharge shall be sampled at the locations and for the species outlined in conditions 52 (i), (ii), (iii) and (iv). Monitoring shall continue at six monthly intervals for two years and annually thereafter for the duration of this permit.</p>	<p>This clause is yet to take effect.</p>
Clause 55	<p>Sample analysis results shall be provided to the consent authority within 60 days of samples being collected. Sample analysis results shall include a ratio of indicator organisms with each pathogen sampled in conditions 53 and 54.</p>	<p>Reports reflect the ratios of indicator organisms.</p>
<b>Whole Effluent Toxicity</b>		
Clause 56	<p>The permit holder shall commission a programme of effluent toxicity testing and reporting. The programme shall include a 24-hour flow weighted composite sample of the combined discharge taken once every three months and tested for toxicity using standard protocols for suitable toxicity testing species for the following three organisms three test species:</p> <ul style="list-style-type: none"> <li>(i) Marine Algae (Minutellus polymorphus)</li> </ul>	<p>Prior to the 2014 amendment, the requirement was to test every three months in the first year and if compliant move to testing every 2 years.</p> <p>In the version of the consent prior to the 2014 amendment had organisms that weren't able to be</p>

Clause No.	Condition	Compliance Review June 2020
	<p>(ii) Mussel</p> <p>(iii) Amphipod</p> <p>The frequency shall be changed to once every two years if no toxicity is demonstrated in four successive summer peak load samples. No toxicity is defined as: "TEC (threshold effect concentration) value for the most sensitive of the three test organisms shall represent a dilution in uncontaminated near shore water of no more than 200 times."</p> <p>Results for testing and analysis shall be reported to the consent authority, within three months of testing. The programme shall also identify the management response to be undertaken by the permit holder in the event that more than 200 times dilution is required for no toxicity.</p>	<p>tested in New Zealand due to being a native of a different country.</p> <p>In 2014 prior to the amendment, it was decided to undertake the WET tests with the common organisms that other wastewater treatment plants were using in New Zealand.</p> <p>The first four tests were compliant, however, the 2014 amendment was in effect and the condition changed to requiring four successive peak summer loads.</p> <p>2015 and 2017 had compliant results.</p> <p>2016 had the laboratory change the methodology and found that we were just above the limit.</p> <p>2018 was just above the limit. Further work will be undertaken in 2019 testing to find whether the reaction is to Domestic, Industrial or Mixed wastewater.</p> <p>In early 2019 testing was undertaken on the industrial effluent, the post BTF effluent and the final effluent. The cause of the non-compliance was the industry effluent. In 2019 the final effluent was non-compliant.</p> <p>The likely cause of the non-compliance is the high BOD from the industrial line. We are currently working with Industry to ensure compliance with the limits once the Wastewater Treatment Plant upgrade commissioning has been completed, including the requirement for compliance with BOD in the Trade Waste Bylaw.</p> <p>In 2020 the final effluent was compliant.</p>

Clause No.	Condition	Compliance Review June 2020
<b>Monitoring of the Receiving Environment for the Duration of the Permit</b>		
<b>Indicator Organisms</b>		
Clause 57	<p>The permit holder shall carry out monitoring of the indicator organisms Enterococci and Faecal Coliforms, and provide results as colony forming units per 100 ml samples, from the following sites:</p> <p>(a) Up until 31 December 2015 or commissioning of wastewater disinfection the Preferred Long-Term Management Option, whichever occurs sooner :</p> <ul style="list-style-type: none"> <li>• The Outfall Mid-Diffuser</li> <li>• Any Visible Plume at 250 metres and 500 metres from the Outfall Diffuser</li> <li>• 250 metres Northwest of the Diffuser</li> <li>• 250 metres North of the Diffuser</li> <li>• 250 metres Northeast of the Diffuser</li> <li>• 250 metres Southwest of the Diffuser</li> <li>• 250 metres South of the Diffuser</li> <li>• 250 metres Southeast of the Diffuser</li> <li>• 500 metres Northwest of the Diffuser</li> <li>• 500 metres North of the Diffuser</li> <li>• 500 metres Northeast of the Diffuser</li> <li>• 500 metres Southwest of the Diffuser</li> <li>• 500 metres Southeast of the Diffuser</li> <li>• Background Site.</li> </ul> <p>Sample analysis shall occur twice monthly during the months November to March inclusive and monthly during the months April to October inclusive and shall coincide with state of the environment monitoring of beach and coastal river sites.</p>	These samples were taken under the prescribed frequency until June 2018 but were not required under the consent after December 2015
	<p>(b) Subsequent To Installation of Wastewater Disinfection the Preferred Long Term Management Option:</p> <ul style="list-style-type: none"> <li>• The Outfall Mid-Diffuser</li> <li>• Any Visible Plume at 250 metres and 500 metres from the Outfall Diffuser</li> </ul>	This clause is yet to take effect.

Clause No.	Condition	Compliance Review June 2020
	<ul style="list-style-type: none"> <li>• 250 metres Northwest of the Diffuser</li> <li>• 250 metres North of the Diffuser</li> <li>• 250 metres Northeast of the Diffuser</li> <li>• 250 metres Southwest of the Diffuser</li> <li>• 250 metres South of the Diffuser</li> <li>• 250 metres Southeast of the Diffuser</li> <li>• Background Site.</li> </ul> <p>Sample analysis shall occur twice monthly during the months November to March inclusive and monthly during the months April to October inclusive and shall coincide with state of the environment monitoring of beach and coastal river sites.</p>	
Clause 58	<p>A benthic survey shall be carried out by the permit holder:</p> <ul style="list-style-type: none"> <li>(i) More than six months but less than one year subsequent commissioning of the wastewater disinfection Preferred Long-Term Management Option</li> <li>(ii) Thereafter at no more than 10-year intervals for the duration of this permit.</li> <li>(iii) There shall be a minimum of four benthic surveys during the 35-year duration of this permit. The survey shall be comparable with former benthic surveys of Poverty Bay (Cawthron), as outlined in Figure 1, unless otherwise approved by the consent authority.</li> </ul>	This clause is yet to take effect.
Clause 59	<p>Transects shall be sampled, as outlined on Figure 1:</p> <ul style="list-style-type: none"> <li>(i) SW orientation at the following intervals: 50W, 100W, 200W, 300W, 400W, 800W, 1200W, 1600W, 2000W and 2400W</li> <li>(ii) SE orientation at the following intervals: 0 (outfall), 50SE, 100SE, 200SE, 300SE, 400SE, 800SE and 2400SE.</li> </ul> <p>The following parameters shall be sampled and analysed at each site outlined in sub-clauses (i) and (ii):</p> <ul style="list-style-type: none"> <li>• Grain size</li> <li>• Heavy metals,</li> <li>• Organic matter,</li> <li>• Stable isotopes,</li> <li>• Infauna</li> </ul>	This is noted.

Clause No.	Condition	Compliance Review June 2020
Clause 60	<p>The following parameters sub-clause (i) shall be sampled and analysed at each of the sites outlined in sub-clause (ii) for the species outlined in subclause (iii)</p> <p>(i) Parameters:</p> <ul style="list-style-type: none"> <li>• Stable isotopes,</li> <li>• Heavy metals,</li> <li>• Poly Aromatic Hydrocarbons,</li> </ul> <p>(ii) From rocky reef communities, species as sampled during the Cawthron survey:</p> <ul style="list-style-type: none"> <li>• Tokomaru Rock.</li> <li>• Te Moana Rock.</li> <li>• Waihora Rock.</li> </ul> <p>(iii) Species</p> <ul style="list-style-type: none"> <li>• Crayfish tissue for trace metals and polyaromatic hydrocarbons</li> <li>• Crayfish gut content and red macro algae for stable isotopes.</li> </ul>	This is noted.
Clause 61	<p>Suspended solids shall be monitored continually on-line by a suspended solids meter which shall continue to be maintained at an agreed location after mixing of all wastewater streams prior to discharge from the outfall. When the suspended solids meter records a sustained result exceeding the concentration limits specified in conditions 33 or 38 or 43 and 45, whichever are relevant and appropriate, for a period exceeding 5 minutes duration the permit holder shall visually inspect the bay from Kaiti Hill/Titirangi either on-site or using the on-site digital camera if weather conditions allow use of the camera.</p> <p>A camera with focal length, field of vision, magnification and image quality (as defined by an independent suitably qualified and experienced professional) and approved by the consent authority shall continue to be maintained at the existing vantage point on Kaiti Hill /Titirangi and directed at the outfall zone. The camera shall be operated and maintained by a suitably trained person employed by the permit holder to provide a permanent and ongoing automated photographic log of the outfall to determine the occurrence of any conspicuous plume/or slick. The automated photographic log shall record photographs at a minimum of 30 minute intervals during daylight hours or at any other interval agreed between the consent authority and the consent holder.</p> <p>Should a conspicuous plume/or slick be identified that may be attributable to the discharge from the Outfall Pump Station then twice daily manual surveillance at 11.00 am and 1.00 pm from Kaiti</p>	<p>The suspended solids meter is installed and operational.</p> <p>There have been no plumes since the commissioning of the BTF.</p> <p>The camera is in place and operational with storage of the images on the Council network.</p> <p>The study was undertaken and no relationship between suspended solids and plumes were found.</p>

Clause No.	Condition	Compliance Review June 2020
	<p>Hill /Titirangi shall commence and shall continue for the ensuing week with appropriate inspection notes and additional photographic images to be recorded. Surveillance photographs shall also continue to be taken by the camera at half hourly intervals during daylight hours over the same period. Images of surveillance photographs shall be forwarded to the consent authority within five working days of being taken. The images shall be stored for the duration of the seasonal horticultural processing season. This condition shall apply until an approved methodology as described in condition 47 is in place.</p>	
<b>Sampling and Analysis</b>		
<p>Clause 62</p>	<p>Sampling and analysis shall be carried out by a IANZ registered laboratory or equivalent and procedures shall be in accordance with Standard Methods for the Examination of Water and Wastewater prepared and published jointly by:</p> <p>American Public Health Association  American Water Works Association  Water Pollution Control Federation, twentieth or newer edition.</p> <p>Note: Procedures for sieve and screen tests have been developed by the Gisborne District Council and are not registered procedures. These tests have proven very useful in determining effective operation of the existing milliscreens and are considered an effective procedure for use in this permit. Consequently, these tests can continue to be used in terms of these permit conditions.</p> <p>Sample analysis results shall be provided to the consent authority within 10 days of samples being collected for micro-organism, oil and grease, suspended solids, biochemical oxygen demand, sieve and screen tests or as specifically required in conditions 49 to 61. Any non-compliant results shall be reported to the consent authority as soon as practicable after the sample analysis reveals a non-compliant result, and in any event within 24 hours. Note: Monitoring frequency and parameters sampled may be reviewed by the WMC, taking advice from the INDEPENDENT REVIEW PANEL, where appropriate. In the event that the WMC considers changes to monitoring frequency and parameters sampled should be made, it may request the consent authority to consider proposed changes as part of the next review of consent conditions. Further advice note: In the event of clarification processes being implemented, further conditions are recommended to be sought and amended by way of variation to this permit.</p>	<p>Laboratories used in monitoring have been checked for relevant accreditation prior to using their services.</p> <p>Sieve and screen tests are no longer carried out.</p> <p>Monitoring results are forwarded to the Consent Authority.</p>

Clause No.	Condition	Compliance Review June 2020
<b>Conditions specific to air discharge DA-207001-00</b>		
Clause 3	The consent holder shall ensure that only suitably qualified and experienced personnel are used for investigation, design, operation, and monitoring of the wastewater treatment plant.	Contractors used for investigation, and design have been checked for relevant qualifications and experience prior to using their services.  New operators are trained and work with the existing operators until they are considered competent in operation and monitoring of the plant.
Clause 4	The consent holder shall keep a record of all complaints and action taken, whether received direct from the complainant or advised by the Manager Environment and Planning, Gisborne District Council (the Manager) or his or her agent.	These complaints are forwarded to the request for service system where the record is held in a Council database system called Ozone.
Clause 5	The consent holder shall notify the Manager of any non-compliance with any condition of this consent as soon as practicable and in any event within 24 hours and shall keep a record of this and the action taken.	These complaints are forwarded to the request for service system where the record is held in a Council database system called Ozone.
Clause 6	There shall be no discharge of odour from the operation of the wastewater treatment plant beyond the designated odour boundary that, in the opinion of an appropriately qualified enforcement officer, is offensive or objectionable.	There have been 8 complaints in the 10 years that the Wastewater Treatment Plant has been operational. These have been investigated and recorded in Ozone.  There were two odour complaints in the 2019-2020 year. These were independently investigated and the sources were found to be from another source, not the Wastewater Treatment Plant.
Clause 7	There shall be no discharge of odour from the operation of the wastewater treatment plant beyond the designated odour boundary that, in the opinion of an appropriately qualified enforcement officer, is offensive or objectionable.	This is a duplicate of clause 6.
Clause 8	The consent holder shall prepare and maintain an Odour Management Plan for the site. As a minimum, the Odour Management Plan shall set out:  a) Management and operational requirements necessary to comply with the conditions of this consent.	There is a current Odour Management Plan. This is reviewed every two years.

Clause No.	Condition	Compliance Review June 2020
	<p>b) Contingency measures to be used in the event of condition 6 not being met, including procedures to allow temporary and permanent roofing of the biological trickling filters in the shortest time practicable, if this is found to be necessary in the future.</p> <p>c) Procedures for the community odour survey and monitoring as required by Conditions 10 and 11.</p> <p>d) Requirements for the operation of odour filters, which shall be designed as a minimum of two filters to allow one to continue operating while one is out of service for maintenance</p> <p>The Odour Management Plan shall be reviewed by the Independent Review Panel described in General Condition 22(b).</p>	<p>The Odour Management Plan will need to be reviewed prior to the commissioning of the Wastewater Treatment Plant upgrade.</p> <p>An independent Review Panel has reviewed the current Odour Management Plan and provided a report.</p>
Clause 9	The consent holder shall operate and undertake activities at the site in accordance with the Odour Management Plan required pursuant to Condition 8.	The site operates under the current Odour Management Plan.
Clause 10	<p>The consent holder shall undertake monitoring of odour discharge rates once within twelve months of Stage 1 Completion and subsequently if required to address unacceptable odour levels at the site. The monitoring shall be on:</p> <p>a) All biofilters, unless agreed otherwise in writing; and</p> <p>b) At the BTF Distribution Tower; and</p> <p>c) Up to two other locations within the site, if they are potential sources of significant odour.</p>	A review is required to determine if a report of this monitoring was completed.
Clause 11	The monitoring shall be by Dynamic Dilution Olfactometry and shall include sufficient samples to fully quantify odour discharge rates from each source.	A review is required to determine if a report of this monitoring was completed.
Clause 12	<p>The consent holder shall ensure that weather conditions in the general vicinity of the site are measured and recorded. This may be at any suitable existing measuring and recording facility from which information is available to the consent holder or at a new site. The parameters measured shall include:</p> <p>a) Wind velocity and direction; and</p> <p>b) Rainfall; and</p> <p>c) Temperature.</p>	A review is required to determine if a report of this monitoring was completed.
Clause 13	The consent holder shall make all records, monitoring and test results that are required by the conditions of this consent available on request, during normal working hours, to an enforcement officer. The required information shall be kept for a minimum period of 24 months from the date of each entry.	Monitoring information from the last 24 months is available if requested.

Clause No.	Condition	Compliance Review June 2020
Clause 14	The consent holder shall notify the consent authority as soon as practicable in the event of any significant increase in the discharge of contaminants to air, which has resulted or may result in adverse effects on the environment. In the event of an incident occurring, the consent holder shall provide a written report to the consent authority within 10 days of the occurrence. The report shall give reasons for the incident, mitigation measures taken and any measures taken to prevent its reoccurrence.	This is noted.
Clause 15	The consent holder shall log all air quality complaints received. The complaint details shall include: a) The date, time, position and nature of the complaint; and b) The name, phone number and address of the complainant, unless the complainant refuses to supply these details: and c) Any remedial actions undertaken.  Details of any complaints received shall be provided to the consent authority as soon as practicable and no more than 24 hours after receipt of the complaint(s).	These complaints are forwarded to the request for service system where the record is held in a Council database system named Ozone. The required information is recorded.
Clause 16	Where conspicuous dust is produced from the operational areas from land disturbance work, including earthworks and construction work, the dust shall be suppressed to the satisfaction of the consent authority to avoid nuisance effects.	This is noted. This clause specifically relates to dust produced during construction. This will be checked as part of the Wastewater Treatment Plant upgrade construction.