

Site Compliance Report

Site No: REG602505
Site Owner: Thames Coromandel District Council
Site Name: Hahei Sewage: Hahei
Date: 2017/2018 Compliance year

1 INTRODUCTION

This report examines the level of compliance of Thames Coromandel District Council (TCDC) with the conditions of the resource consent that authorises the activities of the Hahei Wastewater Treatment Plant (WWTP). Unless otherwise specified in this document the data collected covers the period from the **1 April 2017 to 31 March 2018**. The following resource consent is held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH135636.01.01	Current	Discharge of treated municipal wastewater to the Wigmore Stream and associated seepage to groundwater from treatment ponds	7/12/2017	15/12/2030
AUTH117888.01.01	Expired (s124 protection until 7/12/2017)	Discharge up to 700 cubic metres per day of treated municipal wastewater from the Hahei WWTP into the Wigmore Stream	12/06/2009	31/12/2015

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

2 BACKGROUND

The township of Hahei is located within Mercury Bay on the eastern coast of the Coromandel Peninsula. The population on a day-to-day basis is approximately 450 persons (TCDC Population Growth Study, 2010), however like many holiday destinations in the district, this swells over the summer and public holidays. Approximately a third of the Hahei catchment is serviced by the Hahei WWTP.

The Hahei WWTP uses an 'oxidation pond' system to provide aerobic breakdown of organic matter in wastewater. This consists of an inlet screen, aeration pond and retention pond. The aeration pond consists of 3 aerators, however due to power limitations, only two aerators can be operated at once. The retention pond has baffle curtains to increase retention time. The total designed retention time in both ponds is 55 days, however during summer peak, it is expected that this drops to 16-23 days.

A membrane filtration unit (MFU) was retrofitted to the existing system in 2007 to treat wastewater to a higher quality prior to discharge. It is anticipated that at full operation, the MFU can process a maximum of 600 cubic metres of wastewater per day. Finally, wastewater is discharged into the Wigmore Stream via a perforated pipe diffuser.



Figure 1: Site layout (provided by Harrison Grierson)

RA Number	Status	Date	Site Compliance
RA226243	Not undertaken	30/06/2018	Not assessed
RA219032	Complete	9/05/2017	High level of compliance
RA207406	Not undertaken	12/07/2016	Not assessed
RA203153	Complete	28/05/2015	High level of compliance
RA198766	Complete	10/06/2014	Partial compliance

The most recent audit was undertaken for the 2016/17 compliance period. This audit found the site to be in a high level of compliance with consent conditions. Issues that were identified included incomplete monitoring throughout the year and the ongoing correlation of flow data between the Wigmore Stream and Oponui River.

A new consent was issued in December 2017 which saw more stringent criteria for the quality of discharge from the site. This is the first time that an audit has occurred of the new consent.

3 COMPLIANCE ASSESSMENT

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

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

AUTH135636.01.01 - Water - sewage

Activity Authorised: Discharge of treated municipal wastewater to the Wigmore Stream and associated seepage to groundwater from treatment ponds

Condition No.	Description																					
5	The maximum volume of treated wastewater discharged to the Wigmore Stream shall not exceed 700 cubic metres in any 24 hour period.																					
Evidence	Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and #13635536).																					
Status Reasoning	The maximum reported discharge limit did not exceed 700 cubic meters in any 24 hour period.																					
Action Required	Full compliance																					
6	The maximum discharge rate of treated wastewater to the Wigmore Stream shall not exceed 8.1 litres per second.																					
Evidence	Confirmation of discharge rate (WRC document #3039109)																					
Status Reasoning	It is understood that the range of discharge is between 6.1 and 7.2 litres per second																					
Action Required	Full compliance																					
8	The following limits shall apply to the discharge to the Wigmore Stream from the commencement of this resource consent: <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Parameter</th> <th>90 percentile, not more than one sample in each preceding 10 samples shall exceed:</th> <th>Running average, over any consecutive 10 samples shall not exceed:</th> </tr> </thead> <tbody> <tr> <td>a) Suspended solids (g/m³)</td> <td>20</td> <td>10</td> </tr> <tr> <td>b) Carbonaceous biochemical oxygen demand (cBOD₅) (g/m³)</td> <td>20</td> <td>10</td> </tr> <tr> <td>c) <i>Escherichia coli</i> (cfu/100 mL)</td> <td>20</td> <td>10</td> </tr> <tr> <td>d) Total ammoniacal nitrogen (g/m³)</td> <td>15</td> <td>10</td> </tr> <tr> <td>e) Total Kjeldahl Nitrogen (g/m³)</td> <td>20</td> <td>15</td> </tr> <tr> <td>f) Total Phosphorus (g/m³)</td> <td>20</td> <td>14</td> </tr> </tbody> </table>	Parameter	90 percentile, not more than one sample in each preceding 10 samples shall exceed:	Running average, over any consecutive 10 samples shall not exceed:	a) Suspended solids (g/m ³)	20	10	b) Carbonaceous biochemical oxygen demand (cBOD ₅) (g/m ³)	20	10	c) <i>Escherichia coli</i> (cfu/100 mL)	20	10	d) Total ammoniacal nitrogen (g/m ³)	15	10	e) Total Kjeldahl Nitrogen (g/m ³)	20	15	f) Total Phosphorus (g/m ³)	20	14
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	Total Kjeldahl Nitrogen (TKN) (g/m3)	15 (20)	13.9 (33.6)															
	Total Phosphorus (P) (g/m3)	14 (20)	7.9 (13.2)															
Status Reasoning	The consented parameters for E.Coli and NH4-N were both breached for both running average and 90th percentile. The E.Coli levels were over 30 times the consented limit for both parameters. The 90th percentile for TKN was also in breach of the parameter.																	
Action Required	Please provide a formal update within 1 month of receiving this report explaining why these parameters have been breached and what has been done to rectify the breaches.		Medium priority non-compliance															
15	In addition to the flow monitoring required by condition 14 of this consent, the consent holder shall undertake manual low-flow gauging in the Wigmore Stream at least once during each calendar year when flows are at a seasonal summer low and the flow recorder site is operational. Where there is a prolonged period of summer low flows, the consent holder will repeat the low-flow gauging to ensure data at lower stream flows are measured. The low-flow gauging shall be undertaken at a suitable location upstream of the discharge authorised by this consent at or near the flow recorder site. The purpose of the low-flow gauging is to verify the flow records measured by the flow recorder. The low-flow gauging shall be undertaken by an appropriately qualified and experienced person. A copy of the results of the gauging(s) shall be forwarded to Waikato Regional Council with the written report required in condition 14 and 21 of this consent. The requirement for manual stream flow monitoring under this condition can cease when approval in writing from the Waikato Regional Council under condition 14 has been provided.																	
Evidence	Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and #13635536).																	
Status Reasoning	The annual report states that that the low flow gauging was not undertaken as there was rainfall while they were waiting for low flows. This issue was raised in the previous compliance report and therefore the compliance status been escalated. Failure to undertake this monitoring and provide the data to WRC does not enable either party to make a full assessment of the effect of the discharge, in particular given the non-compliance with discharge parameters.																	
Action Required	Please provide WRC within 1 month of receiving this report with an update with whether this condition has now been met and if not an explanation as to why not.		Medium priority non-compliance															
16	The consent holder shall measure and characterise the quality, quantity and variability of treated effluent being discharged to the Wigmore Stream and the effects of the discharge on the quality and variability of surface water. To this end, the consent holder shall undertake sampling and analysis of the discharge and surface water as follows:																	
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	<p>third week of February - monthly otherwise.</p>	<ul style="list-style-type: none"> • Wigmore Stream 50 metres upstream of discharge • Wigmore Stream downstream at Pa Road bridge <p>Downstream samples to be collected within the period 1 hour either side of local low tide during daylight hours and while discharge is operating.</p>	<ul style="list-style-type: none"> • pH • Sample date and time • Time of low tide occurrence closest to sample time
	<p>e) Monthly – to coincide with d)</p>	<ul style="list-style-type: none"> • Inlet of MFU • Discharge, following all treatment stages and prior to entering the Wigmore Stream • Wigmore Stream 50 metres upstream of the discharge • Wigmore Stream downstream at Pa Road bridge <p>Downstream samples to be collected within the period 1 hour either side of local low tide during daylight hours and while discharge is operating.</p>	<ul style="list-style-type: none"> • cBOD₅ • Nitrate Nitrogen • Suspended solids • Total Kjeldahl Nitrogen • Soluble Reactive Phosphorus • Total Phosphorus by Persulphate Digestion • Turbidity • Sample date and time • Time of low tide occurrence closest to sample time
	<p>f) Once per year in January or February</p>	<ul style="list-style-type: none"> • Wigmore Stream 50 metres upstream of the discharge • Wigmore Stream downstream at Pa Road bridge <p>Refer to condition 19 for sampling and assessment methodology.</p>	<ul style="list-style-type: none"> • Aquatic Macroinvertebrate assessment • Habitat and aquatic plant assessment • Sample date and time • Time of low tide occurrence closest to assessment time
	<p>g) At least once per year – to coincide with summer low flows</p>	<p>Wigmore Stream</p> <p>Additional gauging each summer may be required if low flow conditions are prolonged, to capture a series of low flow records. Refer to condition 15.</p>	<ul style="list-style-type: none"> • Flow (via flow gauging) • Sample date and time
	<p>h) Once every five years in January or February, commencing 2019</p>	<ul style="list-style-type: none"> • Wigmore Stream 50 metres upstream of the discharge • Wigmore Stream downstream at Pa Road bridge 	<ul style="list-style-type: none"> • Fish populations

Evidence

Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and

<p>Status Reasoning</p>	<p>#13635536).</p> <p>Only raw data has been provided and it is unclear through the reporting whether the criteria set out in this condition has been met.</p>	
<p>Action Required</p>	<p>Please provide a comprehensive formal reply showing how this criteria set out in this condition has been met or otherwise within one month of receiving this report.</p>	<p>Low priority non-compliance</p>
<p>20</p>	<p>The consent holder shall provide to the Waikato Regional Council a data report by 1 December each year that this consent is current. This report shall include all data collected under condition 16 of this consent for the period 1 April to 30 September of the current year and shall identify any non-compliance within that period.</p>	
<p>Evidence</p>	<p>Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and #13635536).</p>	
<p>Status Reasoning</p>	<p>The annual report was received on time. Only raw data has been provided and it is unclear through the reporting whether the criteria set out in condition 16 has been met.</p>	
<p>Action Required</p>	<p>Please provide a comprehensive formal reply showing how this criteria set out in condition 16 has been met or otherwise within one month of receiving this report.</p>	<p>Minor technical non-compliance</p>
<p>21</p>	<p>The consent holder shall provide to the Waikato Regional Council a written monitoring report by 1 June each year that this consent is current for the 12 month period from 1 April of the preceding year to 31 March of the current year. As a minimum this report shall include the following:</p> <ol style="list-style-type: none"> 1. a summary of the monitoring results required by condition 16 of this consent for the 12 month period from 1 April of the preceding year to 31 March of the current year and a critical analysis of the information in terms of compliance and environmental effects; 2. a comparison of data with previously collected data identifying any emerging trends; 3. comment on compliance, and any reasons for non-compliance or difficulties in achieving compliance, with condition 8 of this consent; 4. comment on any works that have been undertaken, or that are proposed to be undertaken in the upcoming year, to improve the environmental performance of the treatment and/or disposal system; 5. report on and discuss any complaints received regarding the treatment and/or discharge of treated effluent; and 6. any other issues considered important by the consent holder. 	
<p>Evidence</p>	<p>Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and #13635536).</p>	
<p>Status Reasoning</p>	<p>The annual report does not satisfy the criteria set out in this condition. I do not consider the following information has been supplied to the full satisfaction of this condition;</p> <ul style="list-style-type: none"> • a summary of the monitoring results required by condition 16 • critical analysis of the information in terms of compliance and environmental effects • any reasons for non-compliance or difficulties in achieving compliance with condition 8 • There is no mention if any complaints have been received or whether there is a system in place to record them 	
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	<ul style="list-style-type: none"> •any reasons for non-compliance or difficulties in achieving compliance with condition 8 •There is no mention if any complaints have been received or whether there is a system in place to record them 	
22	<p>The consent holder shall provide to the Waikato Regional Council an ecological assessment report by 1 June every two years for the duration of this consent. This report shall be prepared by a suitably qualified person or persons with relevant training in ecological monitoring and assessment. As a minimum this report shall include the following:</p> <ol style="list-style-type: none"> 1. a summary of the ecological monitoring and water quality results required by condition 16 for the preceding two years; 2. a comparison of data with previously collected data identifying any emerging trends; 3. a critical analysis of the current ecological health of the Wigmore Stream, the potential causes of any degradation of the stream, the effects of the discharge authorised by this consent on the Wigmore Stream and downstream coastal waters; 4. any other issues considered important by the ecologist. 	
Evidence		
Status Reasoning		
Action Required	Please note that an ecological assessment report is due as per this condition by 1 June 2019	Not assessed
24	<p>The consent holder shall provide the Waikato Regional Council with a Management Plan which details the procedures that will be implemented to operate in accordance with the conditions of this resource consent and the procedures that will be put into place to maximise wastewater treatment and minimise odour production. This plan shall be lodged with the Waikato Regional Council within 3 months of the commencement of this consent, and shall be reviewed and updated as a minimum annually. The plan shall address, but may not be limited to, the following:</p> <ol style="list-style-type: none"> 1. a description of the entire treatment and disposal system facility and how it is operated; 2. a description of routine maintenance procedures to be undertaken; 3. an outline of the methods to be utilised to monitor the treatment plant in an operational sense including: monitoring of influent waste water and monitoring of treatment performance; 4. a description of the methods to be used to ensure that sampling of the discharge as required by condition 16 of this consent is representative of overall discharge quality; 5. specific management procedures for the efficient functioning of the treatment system including Micro Filtration Unit, including measures to ensure compliance with condition 8 of this consent relating to discharge quality parameters; 6. procedures for recording routine maintenance and all repairs that are undertaken; 7. contingency measures in place to deal with unusual events; 8. chain of command and responsibility, including contact details; 9. other actions necessary to comply with the requirements of this resource consent; 10. procedures for improving and/or reviewing the management plan. 	
Evidence	WRC file 60 25 05A	
Status Reasoning	A review of the site file has found that this document appears not to have been received.	
Action Required	Please confirm whether this document has been completed and send a copy to Waikato Regional Council within one month of receiving this report.	Low priority non-compliance
28	<p>The register outlined in condition 27 shall be available to the Waikato Regional Council at all reasonable times. Waikato Regional Council shall be informed of complaints received by the consent holder which may infer non-compliance with the conditions of this resource consent to the Waikato Regional Council within 24 hours of the complaint being received. In addition, the consent holder shall provide written information on the incident including all of the details</p>	

	required by (a) to (e) of condition 27 of this consent, which shall be forwarded to the Waikato Regional Council within 5 days of the complaint being received.	
Evidence		
Status Reasoning		
Action Required	Please provide Waikato Regional Council with evidence of the complaints register and the process that occurs when a complaint is received.	Not assessed
30	The consent holder shall implement the treatment plant upgrade works detailed in the Technical Memo titled "Hahei WWTP Consent Ammoniacal Nitrogen Reduction" by Harrison Grierson, dated 14 June 2017 (Waikato Regional Council document number 10628287), or equivalent upgrades, to ensure the wastewater discharge limits in condition 8 are met. The works shall include, as a minimum, installation of additional aeration in the Aeration Pond. These works shall be fully implemented within one year of the commencement of this consent.	
Evidence	Hahei WWTP annual report, supplied on the 13 November 2018 (WRC document #13635747 and #13635536).	
Status Reasoning	The annual report states that new aerators have been installed but cannot run in addition to the existing aerators due to power inadequacies. This issue has been raised in the technical memo.	
Action Required	Please report to WRC how these works have been fully implemented within one month of receiving this report.	Low priority non-compliance
Authorisation Compliance: Significant non compliance		

4 SUMMARY OF COMPLIANCE

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

Authorisation	Authorisation Description	Compliance Status
AUTH135636.01.01	Discharge of treated municipal wastewater to the Wigmore Stream and associated seepage to groundwater from treatment ponds	Significant Non compliance

Overall Site Compliance: Significant Non compliance

5 DISCUSSION AND CONCLUSIONS

This audit has found TCDC to be in significant non-compliance with the resource consent that authorises discharges from the Hahei WWTP. The non-compliance included the breach of discharge quality parameters for E.Coli and NH4-N and TKN, the lack of provision of acceptable reporting and failure to provide an appropriate Management Plan. Lack of accurate reporting led to non-compliance with a number of conditions and captured by condition 21 which sets out the minimum reporting required in the annual report.

Due to the number and severity of non-compliances above TCDC is considered to be in significant non-compliance. I believe a **letter of direction** is appropriate in the first instance seeking a response from TCDC, after which I consider a decision should be made regarding the appropriateness of further enforcement action.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition Number	Action Required
AUTH135636.01.01	8	Please provide a formal update within 1 month of receiving this report explaining why these parameters have been breached and what has been done to rectify the breaches.
AUTH135636.01.01	15	Please provide WRC within 1 month of receiving this report with an update with whether this condition has now been met and if not an explanation as to why not.
AUTH135636.01.01	16	Please provide a comprehensive formal reply showing how this criteria set out in this condition has been met or otherwise within one month of receiving this report.
AUTH135636.01.01	20	Please provide a comprehensive formal reply showing how this criteria set out in condition 16 has been met or otherwise within one month of receiving this report.
AUTH135636.01.01	21	Please provide the following information to the full satisfaction of this condition within one month of receiving this report. <ul style="list-style-type: none">•a summary of the monitoring results required by condition 16•critical analysis of the information in terms of compliance and environmental effects•any reasons for non-compliance or difficulties in achieving compliance with condition 8•There is no mention if any complaints have been received or whether there is a system in place to record them
AUTH135636.01.01	22	Please note that an ecological assessment report is due as per this condition by 1 June 2019
AUTH135636.01.01	24	Please confirm whether this document has been completed and send a copy to Waikato Regional Council within one month of receiving this report.
AUTH135636.01.01	28	Please provide Waikato Regional Council with evidence of the complaints register and the process that occurs when a complaint is received.
AUTH135636.01.01	30	Please report to WRC how these works have been fully implemented within one month of receiving this report.

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

I recommend the following actions be undertaken:

- Issue a Letter of Direction to address the issues raised in the above report.
- Change the site priority to priority 1 such that it is monitored at least once each year with a further compliance assessment scheduled within the next 6 months.
- Consider appropriate enforcement action once the consent holder has had the opportunity to respond to the letter of direction.



Ryan Morrison
Resource Officer
Resource Use

Date: 6 March 2019

7.1 Decision

The above actions recommended are endorsed.



Ed Prince
Acting Team Leader
Resource Use Directorate

Date: 7 March 2019

APPENDIX 1**Compliance Status for Individual Conditions**

Compliance Status	Description
Not assessed	Monitoring of this condition was not undertaken during this monitoring event
High priority non-compliance	The non-compliance has the potential for, or has resulted in, significant adverse effects on the environment.
Medium priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a greater than minor increase in the level of effects authorised.
Low priority non-compliance	There is non-compliance with limits or other direct controls on adverse effects; and The non-compliance has the potential for, or has resulted in, a less than minor increase in the level of effects authorised; and/or There has been a significant technical non-compliance such as a failure to collect or supply self-monitoring data.
Minor technical non-compliance	There is non-compliance with a condition, or part of a condition, that does not directly control adverse effects; and The non-compliance was not significant in the management of effects. For example a short delay in supplying data or meeting a deadline for a report
Full Compliance	The condition has been complied with

Compliance status for individual consents and the entire site

Compliance Status	Description
Not assessed	Monitoring has not been undertaken at this site during the current financial year
Significant non-compliance	There has been a high priority non-compliance; and/or There have been several medium priority non-compliances.
Partial compliance	There has been a medium priority non-compliance; and/or There have been several low priority non-compliances.
High level of compliance	There has been a low priority non-compliance; and/or There have been several minor technical non-compliances.
Full compliance	All conditions that include limits or other direct controls on adverse effects have been complied with. A small number of minor technical non-compliances may have occurred.