



Memo

TO Hearings Panel (Gina Sweetman, Rawiri Faulkner, Jim Cooke)

FROM Shaun Andrewartha, Manager - Environmental Regulation, GWRC and Harry Wilson, Chief Executive Officer, SWDC

DATE 13 December 2019

SUBJECT Joint response from GWRC and SWDC in regard to Minute #13 (4 November 2019)

FILE NUMBER WAR/170229

Applicant: South Wairarapa District Council

Proposal: To discharge contaminants to water, land and air associated with the proposed long term upgrade and operation of the Featherston Wastewater Treatment Plant

Location: Featherston Wastewater Treatment Plant, Donald Street, Featherston
Site A – 65 Longwood West Road, Featherston
Site B – 270 Murphys Line, Featherston

1. Introduction

The Hearings Panel Minute #13 directed that the applicant, South Wairarapa District Council (SWDC), and Greater Wellington Regional Council (GWRC) respond to the Panel by no later than 5pm 13 December 2019 to provide an update on its current approach; which shall include:

- Progress to date;
- An update on consultation undertaken to date;
- An updated timetable;
- A revised timeframe for a hearing; and
- A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.

2. Progress to date

A progress update against the four steps identified as a Council agreed approach is identified in Table 1 below.

Table 1: Progress to date

Step	Task	Progress to date
1	Preparation of a table outlining the outstanding issues/information gaps, responsibility, key issues to resolve at future workshops and matters set out in the	Complete – with ongoing updates. Sven Exeter (SWDC's Consultant Planner, Mott MacDonald) is keeping this table up-to-date to reflect the progress against the outstanding issues/information gaps, responsibility and key issues being resolved. This table is shared with GWRC on an 'as

	GWRC s37 extension and Panel Minute #7.	required' basis i.e. when there are substantial changes.
	SWDC experts draft scopes for the QMRA, Groundwater Effects Assessment and Monitoring and Pathogen sampling plan.	Complete.
2	GWRC and SWDC experts review and approve the scopes of work for the information gaps, with work to be undertaken over the next few months.	<p>Complete - review and approval of scopes of work for the information gaps</p> <p>In progress - addressing information gaps</p> <p><u>Pathogen sampling</u></p> <p>The WWTP pathogen sampling is complete. The results of the sampling has been used by NIWA as part of their analysis of pathogens (bacterial and viral) in the WWTP before and after UV disinfection, and for the Quantitative Microbial Risk Assessment (QMRA).</p> <p><u>Groundwater monitoring (pathogens and other relevant parameters) and effects assessment</u></p> <ul style="list-style-type: none"> • Monitoring of groundwater quality (4 rounds) and levels (6 rounds) on the proposed irrigation site is now complete. • To date, 7 landowners of neighbouring bores have given SWDC permission to take a groundwater sample, evaluate their bore head security, observe existing land use activities, and on-site wastewater septic tanks and disposal systems. Groundwater sampling and bore head security evaluations at all 7 neighbouring sites is now complete, with the three last neighbouring sites completed by the end of November 2019. Laboratory results for the sampling have been received for all neighbours with the exception of one due to change of ownership. The last remaining bore head security assessment is due to be completed this week. All results will be used by SWDC as part of understanding the risk of pathogens to neighbouring site bores. A copy of each assessment will be sent to the landowners, so they each have a copy of their results. <p><u>Quantitative Microbial Risk Assessment (QMRA / public health risk assessment)</u></p> <p>NIWA completed their final QMRA report in early December 2019 after some unanticipated delays. The final QMRA report is currently being used by SWDC's consultant</p>

		<p>wastewater engineers from Mott MacDonald to complete the second phase of the “add-on” feasibility study (see below), and has been provided to GWRC and its experts for their review. The findings in relation to public health risk associated with wastewater discharges will be subject to further analysis and discussion by both SWDC and GWRC’s technical experts.</p> <p><u>Technical feasibility assessment for “add-on” modern wastewater treatment technology</u></p> <p>The second phase of the “add-on” feasibility study commenced in early December 2019 upon the completion of the QMRA report. The feasibility study will identify recommendations to SWDC for additional virus and pathogen treatments to be added to the Featherston WWTP to meet NIWA’s recommended levels of treatment to acceptable levels of pathogen and virus effects. This second phase draft study is anticipated to be completed by 13 December 2019. The outcomes of this study will be subject to further analysis and discussion by both SWDC and GWRC’s technical experts.</p> <p><u>Soil survey interpretation</u></p> <p>Katie Beecroft (SWDC’s Land Treatment Specialist) has completed her technical report, and this has been supplied to GWRC for further review and discussion in the expert workshops.</p>
3	SWDC conduct community engagement which is likely to include community meetings/workshops – to help inform the ‘experts’ workshop identified in Step 4 below.	No further community engagement has been undertaken since the last update provided to the Hearings Panel on 1 November 2019.
4	Expert workshops. The overall goal is to get clarity on the issues, how/if these can be resolved and the different options available to the applicant (together with any perceived risks) going forward.	The expert workshops programmed to take place in November 2019 were postponed, and will be programmed for early 2020 subject to expert availability and whether SWDC propose to implement the recommended “add-ons” to the WWTP (still being worked through) as part of the proposed wastewater treatment activity. Additional treatment add-ons may result in changes to treatment than that originally proposed, and further consideration of whether the changes are considered to be within scope of the original application will need to be undertaken.

3. An update on consultation undertaken to date

Since the last update provided in the 1 November 2019 joint memo, SWDC has not undertaken any additional public consultation activities, due to the focus being on completing the technical assessment work. However, collaborative discussions have continued between SWDC and GWRC staff regarding the progress of technical assessments, outstanding issues/matters, and programme.

The intention is for SWDC to provide a media release to the community in early 2020, on the findings of the QMRA report and the Phase 2 “add-on” feasibility study, so the community can understand whether additional treatment is proposed to the existing proposal, what form this will be in, and whether this is considered ‘in-scope’ of the current application before the Hearings Panel.

4. Updated timetable

The timetable (Table 2) has been updated to reflect the progress of outstanding matters being progressed.

Table 2: Proposed timetable to deal with outstanding issues

Key:  In progress

	Outstanding issue	Proposed timing		
		Dec 2019 (remaining)	Jan 2020	Feb 2020
1	Impacts of the meaning and effect of the provisions of the Proposed Natural Resources Plan decisions and appeals.			
2	Further consultation by SWDC with submitters, the community (including Maori/iwi representatives), and with GWRC officers.			
3	Information in relation to the effects of discharge to land on groundwater that was agreed in the Joint Witness Statement to be provided to GWRC.			
4	Analysis of pathogens (bacterial and viral) in the Wastewater Treatment Plant before and after UV disinfection, which should be undertaken on at least three to four separate occasions by a competent laboratory.	Complete		
5	SWDC to undertake a soil survey in site B in particular to provide certainty on soil types and identify whether there is any evidence of macropores that would cause short circuiting of irrigated wastewater.	Complete		
6	NIWA’s qualitative assessment of health risk be replaced by a quantitative microbial risk assessment (QMRA) with as many of the assumptions in the qualitative assessment as possible being replaced by measurements or robust estimates agreed by all experts.	Complete		
7	Further discussions between experts, particularly surrounding the outstanding areas of disagreement and areas where more information is required. Expert workshops will be held to: 1. Obtain clarity on the issues 2. How/if these can be resolved 3. Identify the different options available to the applicant (together with any perceived risks) going forward			
8	Scope – addressing whether the public health risk arising from pathogen spread through the groundwater is within the scope of what was applied for. Due to the work being undertaken by the applicant to address both GWRC and submitter concerns, any proposed changes to the activities applied for will need to be considered to ensure that they are also within scope of the original application.			

5. The revised timeframe for a hearing

SWDC has been granted an extension to timeframe to complete a hearing by 29 May 2020. Unfortunately due to unanticipated delays to SWDC's technical assessment work (particularly the QMRA), the outstanding matter of scope has still not been addressed (due to SWDC yet to determine whether additional treatment of wastewater is required to address virus and pathogen effects). Because the outstanding matter of scope is an important factor with progressing the application to a hearing, both Councils agree that a revised date for a hearing cannot yet be identified to the Hearings Panel, but anticipates that this could be provided to the Hearings Panel in the next update.

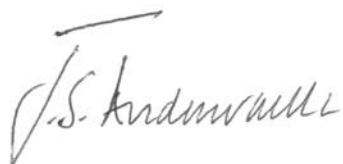
6. A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.

The appeal period for decisions on the PNRP closed at 5pm on 18 September 2019. Most of the provisions relevant to the proposed activity have been appealed. Further analysis will be undertaken once it is known what the final proposed activity will be, and the expert workshops have been completed.

7. Next update to the Hearings Panel

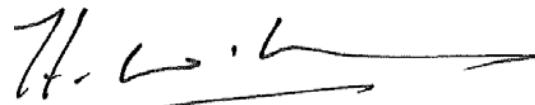
If acceptable to the Hearings Panel, GWRC and SWDC will provide a joint memo to the Panel by 5pm 14 February 2020, which covers:

- Progress to date;
- An update on consultation undertaken to date;
- An updated timetable;
- The revised timeframe for a hearing; and
- A summary of relevant changes to the Proposed Natural Resources Plan, as updated by any appeals.



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