

From: [Euan Kyle](#)
To: [REDACTED]
Cc: [Gordon George](#)
Subject: RE: Trade Waste and Stormwater bylaw breaches
Date: Monday, 7 December 2020 10:22:00 AM
Attachments: [annual TW report for GW August 2020 docx](#)
[image001.png](#)
[image002.jpg](#)
[image003.jpg](#)

Hi [REDACTED]

Apologies for the delay in responding. From what I understand you have talked to Gordon and will be talking to him further in the future. He asked me to send on the report attached. Hopefully between the report and your conversations with Gordon we can answer as many of your questions as possible.

Please let me know if you require anything else.

Regards,

Euan Kyle

Senior Advisor, Official Information and Privacy

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
T 04 570 6702 W www.huttcity.govt.nz

From: [REDACTED]
Sent: Thursday, 3 December 2020 11:18 AM
To: Euan Kyle
Subject: RE: Trade Waste and Stormwater bylaw breaches

Hello,

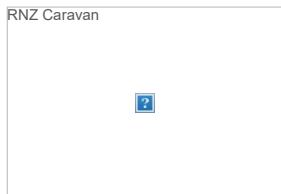
As per your email, can I please have this information only for industrial waste consents?

Regards

[REDACTED]

[REDACTED]

RNZ Caravan



From: Euan Kyle <Euan.Kyle@huttcity.govt.nz>
Sent: Thursday, 19 November 2020 12:13 PM
To: [REDACTED]
Subject: RE: Trade Waste and Stormwater bylaw breaches

19/11/2020

[REDACTED]

Dear [REDACTED]

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

We refer to your official information request dated 21 October 2020 for information regarding Trade Waste and Stormwater bylaw breaches.

The information you have requested is attached.

Regards,

Euan Kyle

Senior Advisor, Official Information and Privacy

Hutt City Council, 30 Laings Road, Private Bag 31912, Lower Hutt 5040, New Zealand
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Encl:

Response Letter to Official Information Request - [REDACTED].pdf
Current Hutt Valley TW discharge consent holders.xlsx

Euan Kyle

Senior Advisor – OIA & Privacy

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From: Euan Kyle
Sent: Thursday 22 October 2020 9:20 AM
To: [REDACTED]
Subject: RE: Trade Waste and Stormwater bylaw breaches

22/10/2020

[REDACTED]

Dear [REDACTED]

REQUEST FOR INFORMATION - LOCAL GOVERNMENT OFFICIAL INFORMATION AND MEETINGS ACT 1987: ACKNOWLEDGEMENT OF REQUEST

I am writing to acknowledge receipt of your official information request dated 21 October 2020 for information regarding Trade Waste and Stormwater bylaw breaches.

We received your request on 21 October 2020. We will endeavour to respond to your request as soon as possible and in any event no later than 20 working days after the day your request was received. If we are unable to respond to your request by then, we will notify you of an extension of that timeframe.

If any additional factors come to light which are relevant to your request, please do not hesitate to contact us so that these can be taken into account.

Yours sincerely,

Euan Kyle

Senior Advisor, Official Information and Privacy

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From: Communications
Sent: Wednesday, 21 October 2020 5:36 PM
To: Euan Kyle
Cc: Caryn Ellis
Subject: FW: Trade Waste and Stormwater bylaw breaches

FYI

From: [REDACTED]
Sent: Wednesday, 21 October 2020 2:13 PM



Hello,

I am seeking information under the Local Government Official Information and Meetings Act about breaches of your council's Trade Waste and/or Stormwater bylaws.

Trade Waste Bylaw

1. Please provide me with copy of your council's Trade Waste Bylaw.
2. A list of companies or organisations that have active consents to discharge trade waste.
3. A list of companies that have breached the conditions of their trade waste consent over the last 12 months.
4. For each consent, please describe what limits and conditions have been set for this consent holder.
5. For each company with a breach, please describe what each breach was, the time it occurred/or was discovered , and what action was taken.
6. How many fines has your council issued for breaches of your Trade Waste Bylaw in the last 12 months.
7. How many prosecutions have been filed in the last 12 months for breaches of the Trade Waste bylaw
8. What regular testing does the council conduct at each site with a trade waste consent?
9. What substances/compounds does the council test for at each site?

Stormwater Bylaw:

1. Please provide a copy of your council's stormwater bylaw, and include any other information about what is not allowed to be put into the stormwater system.
2. A list of entities that have consents to discharge into the stormwater system, if any.
3. Have there been any breaches of the Stormwater Bylaw in the past 12 months?
4. If so, please provide details on what the breach was, when it occurred/or discovered, and what action was taken.

Regards,



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Hutt City Council

Trade Waste Management

July 2019 – June 2020

Prepared by:
Gordon George (HCC)

Reviewed by:
Joemar Cacnio (WWL)

Regulatory Division
Hutt City Council

for
Wellington Regional Council

4/08/2020

FILE: EM20-80-2

Contents

1.	SUMMARY	1
2.	LOADINGS	6
3.	COMPLIANCE MONITORING	8
4.	CONTAMINATION REPORTS.....	9
6.	PLANNED WORK.....	9

1. SUMMARY

This report has been prepared to fulfil condition 20 of consent WGN 050359 to discharge treated effluent from the Seaview wastewater treatment plant. The condition reads:

The permit holder shall take reasonable steps to monitor and manage trade waste inflows into the sewerage system so as to minimise the risk of disruption to the wastewater treatment process. The permit holder shall provide the Manager, Environmental Regulation, Wellington Regional Council, with an annual report on trade waste which summarises issues arising and actions taken by 31 July.

The Hutt City Council Regulatory Services Division manages trade waste for Hutt City Council and Upper Hutt City Council under an internal contract to the Hutt City Council Environment and Sustainability Group. The Trade Waste team's core work is management of trade wastes discharges but it also covers other water related activities. The team has five members.

A total of around 680 premises in the Hutt Valley were licensed to discharge trade wastes. This included approximately 550 food premises, approximately 80 automotive businesses and a range of others including six breweries, a distillery, two landfills (one closed), paint manufacturers, electroplaters, laundries etc.

Approximately 130 dischargers are regularly monitored with the sampling frequency ranging from annually to daily. The frequency is determined on the basis of risk, variability of the waste stream and compliance history. Non-compliant results prompt re-sampling at the dischargers expense. Almost all dischargers receive at least one inspection per year with some sites visited more frequently.

There continues to be issues with sampling not occurring as per specified frequencies as a result of staff changes at the main laboratory. Covid closures also caused a break in sampling. The issue of samples being non-representative (and hence invalid) has reduced but not been eliminated. Food premises sampling continues to be problematic with results appearing significantly higher than our observations and maintenance activity would suggest. Multiple joint sampling visits have occurred to improve sampler techniques but inconsistencies and concerns remain. This issue is a regional concern affecting multiple Councils.

There has been the usual turnover of smaller sites with many more new food premises opening than old ones closing. No particularly large dischargers have started up with the proposed large cheese plant stalled due to receivership issues. Our craft breweries have slightly increased in output and now also have large on-site food activities. Many grew through covid lockdown and volumes have not reduced since. Our corn chip manufacturer, Mexican Supplies, has continued to increase production (and

discharges) though has not yet resolved issues related to the elevated pH of their discharge.

As noted previously a local cheese plant was set to expand considerably on a Seaview Road site and construction was well underway. However they ran into financial trouble and a receivership has that project stalled currently. We have continued to raise concerns with the operator over possible future whey discharges with whey a known problem product for our WWTP.

The two landfills continue to be the highest volume (but not organic load) dischargers and both sites are rainfall influenced. At the end of 2012 the Wainuiomata landfill ceased accepting new wastes and the leachate volume has now reduced though it is still influenced by rain and ground water flows. Silverstream landfill is operating new fully lined cells and volumes are less rainfall influenced than Wainuiomata. The leachate strength from the old Wainuiomata landfill continues to track downwards as expected.

Most businesses have remained steady or slightly elevated in their productive outputs throughout the year and post the covid closures. However some have not fared so well post covid. Particularly hard hit has been the laundry sector given the reduction of hotel and hospitality activity. Thus far we have only had a relatively small number of businesses (around 6) cease trading as a result of the covid closures and related issues.

Loadings for the 2019-20 year are slightly down on the 18-19 year but still noticeably elevated from previous years and industrial loads are currently back where they were around 10 years ago. Panhead brewery which was experiencing difficulty in managing its loads has made significant improvements, reducing the overall total industrial load. The likelihood continues to be that loads will remain steady in the future. A very large upgrade (\$190M) is underway on an Upper Hutt site and will result in a slightly increased load from that site.

The Hutt Valley has a very diverse range of medium industries with relatively few large dischargers and the ability of any one closure to noticeably impact upon us is very limited.

As noted in previous reports the Waste Management Technical Services site as the regions one remaining broad spectrum waste treatment facility is a key site in terms of maintaining local manufacturing viability for some industries. Waste transport costs could otherwise create an impediment to some activities.

In recent years non-compliance has generally been of a less significant nature or of a more localised impact (e.g. blocked sewers) however we continue to target some sites in order to generate improvements. Sites specifically targeted include Groenz (issues

with solids, oil & grease and COD), all of our breweries and a number of larger food or drink manufacturing premises.

In the past year a number of older undersized grease traps have been removed and replaced with larger more effective units and several further sites have upgrade works pending. Affected sites include Upper Hutt Cossie Club, Petone Working Mens Club, Wainui Bakery, The Pavilion, Walter Nash Centre, The Seashore Cabaret Open Polytech and a number of smaller sites. Pending are New World Hutt City, Speights Alehouse, Silverstream Retreat, Quinns Post UH, Ripe Coffee, Dirty Burger and Caffiend. Covid has caused delays in some replacements.

Only a limited amount of proactive monitoring has been considered necessary. Non-compliances involving heavy metals continues to have a lower significance given that landfill discharge does not require a high quality biosolid. That noted the quality of biosolids with respect to heavy metals content continues to be very good and few incidences of elevated metals from discharger monitoring have been noted.

Non-compliance notices, cancellation of consents, additional sampling, elevation of consent fees and additional fees for re-inspections are used as effective tools to motivate reluctant or non-compliant sites (most commonly small sites). Telemetry systems are operating on waste water flow meters at several trade waste sites.

There were no formally reported contamination incidents (e.g. high load or foam) at the Seaview wastewater treatment plant (WWTP) during the past year.

Whilst we suspect there are still illegal discharges to sewer from at least one sump truck operator the impacts are now not obvious and discharges from that operator to the waste treatment company (WMTS) are occurring. As time permits we will progress a Waste Collection and Transportation Bylaw. It will require the licensing of all suction trucks used for servicing trade wastes sites (primarily grease and oil traps) and will likely require GPS tracking of vehicles. This intention has also been discussed on several occasions with local operators in an industry meeting forum run via Wellington Water.

Biosolids quality is generally consistently good with relatively low levels of heavy metals. As noted earlier it is currently landfilled. Efforts are ongoing to keep the quality high lest re-use options be found.

We have monitored heavy metals contained in the WWTP biosolids for over 16 years and it has proved a useful tool in understanding the performance of industry and in demonstrating to dischargers the effects of poor discharger performance. It shows what is actually being discharged by industry to sewer as it accounts for all sites and is not influenced by discharger behaviour on sampling event days.

The Seaview biosolids have consistently met the pre 2012 “grade b” contamination limits and meet the “grade a” limits for 6 of the 8 metals monitored, the exceptions being copper and zinc. The 2012 guideline limits for copper and zinc (100 and 300 mg/Kg respectively) are unlikely to be met without additional efforts to dilute the biosolid due to the domestic catchment accounting for levels greater than those limits anyway, i.e. even without industries contribution the biosolid would exceed the 2012 copper and zinc limits. This is believed consistent with most other urban areas.

Table 1: Biosolids monitoring summary

Period	Arsenic	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Zinc
	Averages (mg/kg)							
2014-15	4.1	1	25	270	28	1	12	474
2015-16	3.9	0.8	25	272	25.5	0.7	12	500
2016-17	4.3	0.6	48	269	27.0	0.9	17.0	525
2017-18	3.8	0.5	28	202	22.5	0.7	10.6	381
2018-19	4.0	0.4	28	166	22.0	1.1	9	377
2019-20	3.6	0.4	25	145	17	0.6	9	345
	Minimum (mg/kg)							
2014-15	2.9	0.5	14	187	19.6	0.5	7.9	327
2015-16	3	0.5	13.9	185	16.6	0.5	7.7	398
2016-17	2.9	0.4	19.7	187	18.0	0.6	8.9	348
2017-18	2.8	0.3	15.1	162	17.3	0.5	7.6	350
2018-19	3.1	0.3	7.7	99.9	11.3	0.4	5.2	266.0
2019-20	2.7	0.3	11	118	13.5	0.4	6	288
	Maximum (mg/kg)							
2014-15	6.7	2.9	39.6	368	40.1	2.8	20.3	664
2015-16	6.7	2.3	47.7	391	42	1.2	20.3	767
2016-17	5.9	0.7	136.0	339.0	38.2	2.8	33.2	876.0
2017-18	5.4	1	71.4	250	36	1	14.7	407
2018-19	5.2	0.5	109.0	214.0	38.0	4.2	10.5	463.0
2019-20	4.5	0.5	55	170	20	0.8	13	386
	Guidelines for the Safe Application of Biosolids to Land in NZ (MfE 2003)							
Grade “a”	20	3	600	100*	300	2	60	300*
Grade “b”	30	10	1500	1250	300	7.5	135	1500

Note * - The copper and zinc limits reduced in December 2012

The monitoring results for the past six years generally show a reduction in most metals and a sustained drop in copper and zinc concentrations since May 2017. This drop may be related to changes in potable water treatment (and corrosiveness) as a result of increased chlorination. The exact mechanism is unclear.

The base load of copper and zinc is residentially sourced (personal products, hot water cylinders and pipe material etc) and was previously estimated (via xmas loads) for the Hutt Valley catchment at around 170 mg/kg for copper and around 350 mg/kg for zinc. However those base loads are now likely closer to around 100 mg/kg for copper and around 250 mg/kg for zinc.

The overall downward trend in the heavy metal loads is pleasing but with a range of laboratory issues apparent it would be wise to consider further analysis should alternative re-use options be found. Several months' worth of data was not obtained due to Covid and laboratory failure or confusion.

2. LOADINGS

Trunk wastewater system loadings due to Trade Wastes as assessed from User Charges calculations are detailed in Table 2 below.

Table 2: Trade waste loadings for 2019-2020 year

Period	Daily Volume Average m ³ /day	Daily SS Average kg/d	Daily COD Average kg/d
July-August 2018	2857	611	3504
Sept-October 2018	2986	738	4228
Nov-Dec 2018	3110	672	3785
Jan - Feb 2019	2515	684	3466
March - April 2019	2087	700	3722
May - June 2019	2405	552	2893
Average daily(n=6)	2660	660	3600
Total at Seaview WWTP 2017-20 av	56775 m³/d	10297 kg/d	19,978 kg/d
Trade wastes %	4.7%	6.4%	18%

Note - COD not measured on Seaview influent, assumed COD = BOD x 2.5

Annual loadings for 2002-2020 and two-monthly average loadings for 2019 - 2020 are shown in Figures 1 and 2 below.

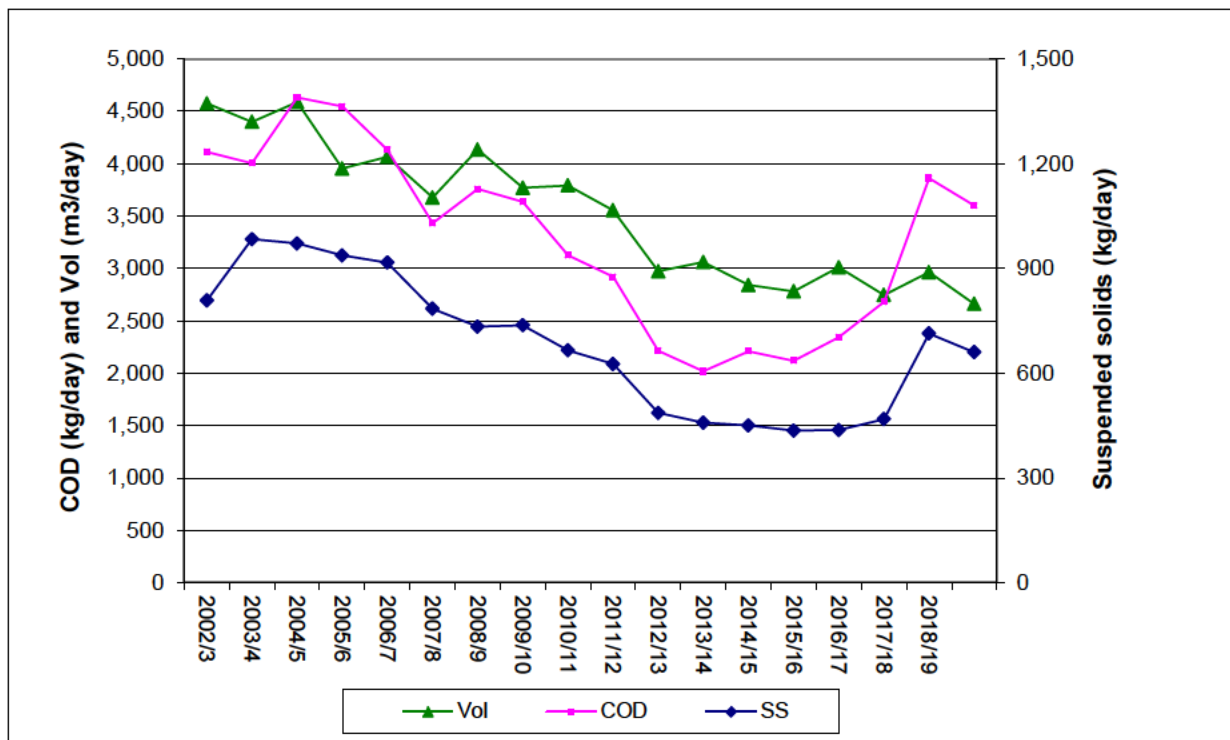


Figure 1: Comparison of average trade waste loadings with previous years

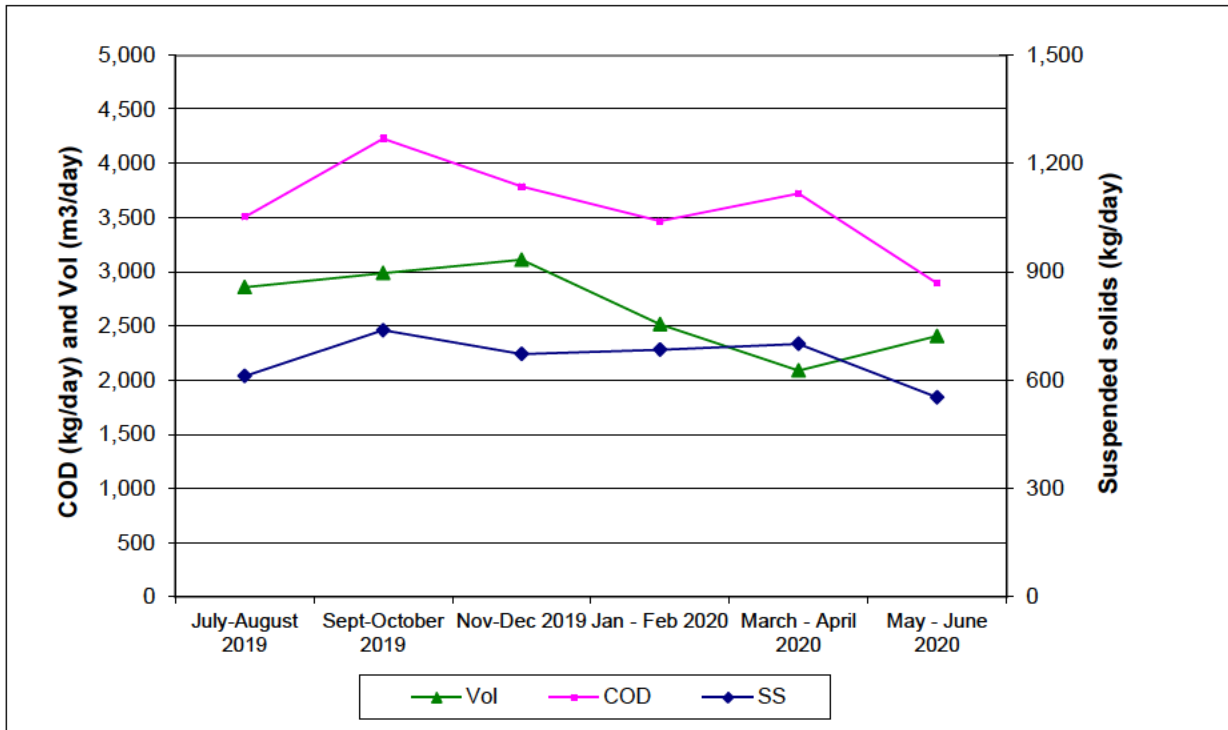


Figure 2: Two-monthly average trade waste loadings for 2019-20 year

Comments

Figure 1: Shows a decrease in loads from the previous year. That decrease can be attributed to a combination of waste water quality improvements (e.g. at Panhead) and the impact of the late March to mid-May covid closures. Local industrial activity is generally buoyant.

Figure 2: Rain influenced landfill flows are apparent during the July to September period as per in previous years. Improvements to discharger wastewater quality and reduction in loads during the covid closure can also be seen.

3. COMPLIANCE MONITORING

A large number of premises are inspected and sampled by the trade waste officers each month. A summary of the inspection and compliance data follows:

Table 3: Inspection and monitoring statistics

Month	Premises inspections	Premises sampled	Number of sample analyses
Jul-19	156	21	129
Aug-19	156	14	90
Sep-19	74	15	86
Oct-19	159	12	73
Nov-19	95	15	73
Dec-19	137	11	60
Jan-20	77	14	76
Feb-20	139	5	38
Mar-20	54	14	94
Apr-20	0	refer May	refer May
May-20	154	31	155
Jun-20	154	9	52
Total 2019-20 (2018-19)	1355 (1226)	161* (201*)	926* (1186*)

* = Some data not obtained or excluded due to failure of lab to sample or incorrect sampling.

Table 4: Significant non-compliance statistics

Month	Daily volume > 5m ³ /d	Daily volume < 5m ³ /d
Jul-19	1	1
Aug-19	1	1
Sep-19	1	0
Oct-19	1	0
Nov-19	0	2
Dec-19	1	1
Jan-20	1	0
Feb-20	1	0
Mar-20	1	0
Apr-20	0	0
May-20	3	1
Jun-20	0	2
Total 2019-20 (2018-19)	11 (14)	8 (8)

Note - significant non-compliance is a sample result of twice their consent limit for most parameters excluding pH. Sampling issues make year to year comparison difficult.

Issues with the laboratory continue to impact upon the quality and quantity of the sampling data. The number of sites sampled is below that which should have occurred. Reasons include sampling activity ceasing from late March to the end of April for the Covid shutdown, site data excluded due to concerns over sampling technique and apparent slippage of the sampling program by the laboratory. It is also possible that some reported non-compliances were due to sampling errors where the results were not obviously outliers.

The total of 19 incidences of significant non-compliance is derived from 13 individual sites with 3 sites appearing multiple times (one 4 times) in part because of targeted additional sampling by the trade waste officers to ensure sample integrity.

The 13 sites comprise a range of dischargers including 2 breweries, a waste treatment plant, a detergent manufacturer, an electroplater a sauce manufacturer, a corn chip manufacturer several supermarkets, a cardboard packaging manufacturer, a road sump dewatering facility and a sealant manufacturer. Most of the non-compliances whilst technically significant were of only limited concern to the overall sewer system and local networks.

Re-sampling as a follow-up to non-compliance is ongoing to assess continuance of the issues or improvements.

4. CONTAMINATION REPORTS

Contamination and foam incidents reported to HCC by the wastewater treatment plant operators in are noted below.

Table 5: Reported contamination incidents in 2018-2019 year

Date	Nature of incident	Action by TWO or other HCC officer	Comment
None formally notified			

5. PLANNED WORK

A complete re-write is still needed to the trade waste IT system and we are still awaiting that action occurring.

As noted previously a draft of a waste collection and transportation bylaw will be completed when time permits. The concerns which prompted the drafting process have abated, lowering its priority.

Continued collaboration between the Hutt trade wastes officers and those of Wellington Water and the Porirua CC trade wastes officer.

Efforts will continue in regard to having replaced older undersized or now ill-suited pre-treatment equipment. Commonly this involves replacement of old smaller grease traps.