

3 December 2020

Ravensdown Limited
C/- Helen Hurring
Private Bag 6012
Napier 4142

Reference: **AUTH-114016-02**

Attention: Helen Hurring, helen.hurring@ravensdown.co.nz

Dear Helen,

COMPLIANCE MONITORING REPORT

Consent number:	AUTH-114016-02 (Please note this number replaces your historic number)
Historic number:	DP040143Wa
Consent Location:	DISCHARGE WATER 90 Waitangi Road, Awatoto, Napier
Consent Description:	to discharge contaminants into water for the purpose of disposing of stormwater, cooling water from air compressors and a hydraulic drive, water from drinking fountains and a truck wash, water from cooling towers and high pressure boilers, and rinse water from a boiler water treatment plant into the Tutaekuri River (Waitangi Estuary)

Hawke's Bay Regional Council has completed the Compliance Monitoring Report for above Resource Consent.

THIS REPORT APPLIES TO THE PERIOD: 01/07/2019 to 30/06/2020
YOUR CURRENT COMPLIANCE GRADE IS: Low Risk Non-Compliance

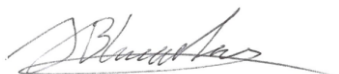
THE FOLLOWING ACTION ARE RECOMMENDED TO BE TAKEN BY YOU:

Action:	Timeframe:
It is recommended that the consent holder investigate potential sources of contaminants used or stored on their site that are elevated within surface water samples collected from the Waitangi Stream.	03-12-2020 - 30-06-2021

Under Section 36 of the Resource Management Act 1991 you will be charged for the actual and reasonable costs involved in monitoring the resource consent. The account will be sent to you in due course.

Please contact me should you have any questions.

Yours sincerely



Jack Blunden
Team Leader Compliance – Urban & Industrial
Policy & Regulation Group

Phone 06 835 9200
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HAWKES BAY REGIONAL COUNCIL: STATEMENT OF COMPLIANCE AND OVERALL GRADE

CONSENT HOLDER	Ravensdown Limited	CONSENT NUMBER	AUTH-114016-02
CLIENT ADDRESS	C/- Helen Hurring Private Bag 6012 Napier 4142	SITE ADDRESS	90 Waitangi Road, Awatoto, Napier,
JOB CODE	456006	CONSENT TYPE	Resource Consent
MONITORING INSPECTION DATE	9/08/2019		

ACTIVITY DESCRIPTION

to discharge contaminants into water for the purpose of disposing of stormwater, cooling water from air compressors and a hydraulic drive, water from drinking fountains and a truck wash, water from cooling towers and high pressure boilers, and rinse water from a boiler water treatment plant into the Tutaekuri River (Waitangi Estuary)

OVERALL COMMENT

This report covers the period 01/07/2019 to 30/06/2020.

A site visit was made on the 08/09/2020.

This report identifies a minor non-compliance with condition 5 as a result of flow proportional samples of the discharge not being taken on three occasions. Three minor pH exceedances (condition 4) were recorded but no discharge occurred so these have not been graded non-compliant.

Condition 6a-g, 7 and 8 do not apply until 2023 when the next survey is due to be completed.

Full compliance with all other conditions has been achieved.

It is recommended that the consent holder investigate potential sources of contaminants used or stored on their site that are elevated within surface water samples collected from the Waitangi Stream.

Consent Conditions and Compliance Assessment

NO:	CONSENT CONDITION:	COMPLIANCE GRADE:	COMMENTS:
1.	All works and structures relating to this resource consent shall be designed and constructed to conform to the best engineering practices and at all times maintained to a safe and serviceable standard.	Full Compliance	During the site visit it was observed that all structures were well maintained and conform to the best engineering practices. Weekly and monthly inspections are undertaken to identify problems and any required repairs are scheduled into a maintenance program. The consent holder is in the process of upgrading the water sampling system to avoid cross contamination and improve sample integrity.
2.	The consent holder shall undertake all operations in accordance with any drawings, specifications, statements of intent and other information supplied as part of the application for this resource consent. If a conflict arises between any conditions of this consent and the application, the conditions of this consent will prevail.	Full Compliance	There have been no major changes to operations onsite during the compliance period. Compliance based on as-built plans, producer statement and visual observations on site.
3.	For the purposes of this consent, the zone of reasonable mixing of the discharge, to which the Class AE (HB) receiving water quality standards does not apply, shall be the Ravensdown Drain and 90 m down the Awatoto Drain (GPS Co-ordinates N6175341, E2846875).	Not Applicable	This condition refers to the mixing zone and is informative.

<p>4.</p>	<p>The consent holder shall ensure that the discharge complies with the following standards at the outlet of the settling pond, as shown on Figure 3 submitted with the application and attached:</p> <p>a) pH to be within 6.5 – 8.5.</p> <p>b) Fluoride not to exceed 30 mg/litre.</p> <p>c) Suspended Solids not to exceed 100 mg/litre.</p> <p>d) Rate of discharge not to exceed 265 litres /second.</p> <p>e) Total phosphorus:</p> <p>From the date of the commencement of this consent until 30 June 2012:</p> <p>☐ Over any 12 month period the concentration of total phosphorus shall not exceed 35 mg/litre for more than 95% of the time</p> <p>☐ Over any 12 month period the concentration of total phosphorus shall not exceed 40 mg/litre for more than 99% of the time.</p> <p>From the 1st of July 2012:</p> <p>☐ Over any 12 month period the concentration of total phosphorus shall not exceed 17 mg/litre for more than 95% of the time</p> <p>☐ Over any 12 month period the concentration of total phosphorus shall not exceed 22 mg/litre for more than 99% of the time.</p> <p>f) Soluble Reactive Phosphorus:</p> <p>From the date of the commencement of this consent until 30 June 2012:</p> <p>☐ Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 30 mg/litre for more than 95% of the time</p> <p>☐ Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 35 mg/litre for more than 99% of the time.</p> <p>From the 1st of July 2012:</p> <p>☐ Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 15 mg/litre for more than 95% of the time</p> <p>☐ Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 20 mg/litre for more than 99% of the time.</p>	<p>Full Compliance</p>	<p>During the site visit all sample data processes and collection/analysis processes appeared to be operating as required. A full assessment of the data for this period shows some low-risk non-compliance with pH levels</p> <p>a) There were three minor exceedances of pH in samples collected twice in January and again in June 2020. The consent holders data system shows that no discharges occurred prior to the pH being within consented limits again. The exceedances were also as a result of bottle cross contamination and not representative of the discharge waters.</p> <p>b) There were no exceedances of fluoride during the period.</p> <p>c) There were no exceedances of total suspended solids during the period.</p> <p>d) There were no exceedances of the total rate of discharge during the period.</p> <p>e) There were no exceedances of total phosphates during the period.</p> <p>f) There were no exceedances of soluble reactive phosphorus during the period.</p>
<p>5.</p>	<p>The consent holder shall carry out the following monitoring programme at the consent holders expense:</p> <p>a) A sampling station shall be maintained at the outlet of the settlement pond and be accessible to the Council officers, or its agents at all times.</p> <p>b) A representative, flow-proportional, composite sample (sampled continuously over a period of 24 hours) shall be</p>	<p>Low Risk Non-Compliance</p>	<p>a) A sampling station is maintained at the outfall from the stormwater detention pond</p> <p>b) Weekly 24 hour flow proportional sampling has been undertaken as required during the period except for 3 occasions in November and December 2019 due to sampler malfunction. All samples collected were analysed for pH,</p>

	<p>collected from the sampling station, referred to in Condition 5a, at least once per week and tested for the following parameters:</p> <ul style="list-style-type: none"> i) pH ii) total phosphorus iii) soluble reactive phosphorus iv) fluoride v) suspended solids <p>Results shall be recorded on a mass per unit volume of discharge basis and the volume of discharge shall also be recorded. The records shall be forwarded to the Council at monthly intervals, along with an assessment of compliance against condition 4.</p> <p>c) A representative, flow-proportional, composite sample (sampled continuously over a period of one week) shall be collected from the sampling station, referred to in Condition 5a, at six monthly intervals and tested for the following parameters:</p> <ul style="list-style-type: none"> i) total copper ii) total zinc iii) total cadmium iv) total chrome v) total aluminium vi) total sulphur <p>Results shall be taken on a mass per unit volume of discharge basis and the volume of discharge taken shall also be recorded. The records shall be forwarded to the Council at six monthly intervals.</p> <p>d) All sampling and surveys shall be carried out by a person suitably qualified and experienced in this field and authorised by the Council (Manager: Regulation).</p> <p>e) All analyses in accordance with conditions of this consent shall be carried out by an independently IANZ accredited laboratory and authorised by the Council (Manager: Regulation).</p> <p>f) The consent holder shall calibrate and operate any meters required for monitoring in accordance with the manufacturer's specifications, or to the reasonable satisfaction of the Chief Executive of the Hawke's Bay Regional Council.</p>		<p>TP, SRP, F and TSS. The results are recorded and reported monthly to Council along with monthly discharge volumes.</p> <p>c) Bi-annual heavy metal sampling was undertaken on the 11/02/2019 and 09/06/2020 by the consent holder. The samples were analysed for Cu, Zn, Cd, Cr, Al and S. The values are reported with discharge volumes so total mass can be calculated. The results are provided monthly to Council.</p> <p>d) All sampling is undertaken by suitably qualified and experienced staff or contractors.</p> <p>e) All analyses is undertaken by IANZ accredited laboratories.</p> <p>f) An independent review of monitoring processes on site found that monitoring and sampling procedures were being carried out in accordance with best practice and equipment was well maintained and calibrated.</p> <p>The low risk non-compliance relates to the missed flow proportional samples in November and December 2019</p>
6.	<p>Every fourth year starting from the commencement of this consent, the consent holder shall monitor the following components in the receiving environment at their expense:</p> <ul style="list-style-type: none"> a) the structure of macrofaunal communities to determine both temporal and spatial changes in the community composition. Species diversity, richness, abundance and evenness shall be determined for the benthic macrofauna, and data should be subjected to appropriate multi-variate analyses in relations to chemical and physical measurements. b) sediment quality to determine sediment health, and potential accumulation of contaminants within the sediments. <p>Sediments should be analysed for:</p>	Full Compliance	<p>The consent holder undertook the required 4 yearly monitoring of the receiving environment in accordance with the submitted and approved sampling plan required by condition 7. The monitoring and sampling was undertaken in March 2019. Condition 6a-g will apply in 2023 when the study is due to be undertaken next.</p> <p>h) Monthly monitoring of the surface water locations has been undertaken for the required period. All receiving water samples have been analysed for the required determinants. The sampling</p>

<ul style="list-style-type: none"> - total copper - total cadmium - total chromium - total zinc - fluoride - total phosphorus - sulphur - sediment composition - nickel <p>As per table in consent document:</p> <p>c) Cancelled.</p> <p>d) chlorophyll a concentrations as an indicator of potential nutrient enrichment.</p> <p>e) presence/absence of fish species.</p> <p>f) periphyton biomass and taxonomy as an indicator of potential nutrient enrichment.</p> <p>g) undertake Whole Effluent Toxicity Testing to determine the effects of the combined discharge on organisms in the receiving environment on three test species at 100: 1 dilution.</p> <p>h) Every month¹, starting from the commencement date of this consent, the consent holder shall monitor, at their expense, at the locations indicated by a green star in Appendix 2, receiving water quality to determine whether contaminants of concern are present and in what concentrations.</p> <p>Receiving water should be analysed for:</p> <ul style="list-style-type: none"> - Temperature - Salinity - Dissolved oxygen - pH - Suspended Solids - Chlorophyll a - Ammoniacal Nitrogen - Nitrate Nitrogen - Nitrite Nitrogen - Nitrate + Nitrite Nitrogen - Total Nitrogen 	<p>indicates elevated levels of Al, Cd, Cr, Cu, Zn, Ni, nitrate species, SRP and TP at most sites in excess of the ANZECC (2000) trigger levels.</p> <p>i) One flush stormwater event was sampled during the period due to drought conditions and reduced rainfall events outside of the control of the consent holder. Samples were collected on the 22/06/2020 from the required locations. The samples were analysed for all determinants. The sampling results indicate ongoing exceedance of the ANZECC (2000) trigger level values at most sites for Al, Cd, Cr, Cu, Zn, Ni, nitrate species, SRP and TP.</p> <p>Further investigation into the source of these elevated levels should be undertaken and any action to reduce impacts from the Ravensdown operation on the receiving environment should be identified.</p>
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	<ul style="list-style-type: none"> - SRP - TP - Sulphur - Fluoride - Metals (Al, Cd, Cr, Cu, Zn and Ni) <p>As per table in consent document:</p> <p>1For the avoidance of doubt it is acknowledged that monitoring can only occur when there is flow present in the Waitangi Drain. If there is no or very low flows in Waitangi Drain the consent holder must inform the Council (Manager Resource Use) that they have been unable to undertake the required sampling as soon as practicable, and within 7 days of trying to undertake the sampling. Evidence (eg. photos of flows in the drain at the time) should be provided to confirm this.</p> <p>i) Each year, on two occasions (one during either January or February, and one during June, July or August) the consent holder shall monitor stormwater discharged in the “first flush” of a rainfall event. Samples shall be taken at the locations indicated by a red star in Appendix 2 and analysed for the same contaminants and at the same detection limits as specified in condition 6 (h) except for chlorophyll a which samples do not need to be analysed for.</p>		
7.	The consent holder shall submit a monitoring program, designed to meet the requirements of Condition 6, to the satisfaction of the Council (Manager: Environmental Regulation), prior to the receiving environment monitoring occurring in accordance with Condition 7.	Not Applicable	<p>The monitoring program was received and approved by Council ahead of the monitoring being undertaken by the consent holder.</p> <p>This condition will apply again in 2023.</p>
8.	Within three months of the receiving environment monitoring taking place in accordance with Condition 7, the consent holder shall submit a report to the Hawke’s Bay Regional Council detailing results and analysis of the monitoring, and a summary of conclusions.	Not Applicable	<p>The report was submitted to Council in 2019.</p> <p>This condition will apply again in 2023.</p>
9.	The consent holder shall prepare an annual report for the period of July to June each year, and before 31 October submit it to the Hawke’s Bay Regional Council. The report shall summarise monitoring and compliance to the consent conditions and discuss any non-compliance and recommended necessary actions to achieve compliance.	Full Compliance	<p>The annual report was submitted on the 31/10/2020 within the specified timeframe. The report provides a summary for the discharge to water and air consents, of all monitoring undertaken during the period and a summary of compliance with the conditions of this consent. An assessment of the impact of the discharge is also included.</p> <p>A discussion of non-compliances is included as follows:</p> <ul style="list-style-type: none"> - 3 occasions during the period where pH was lower than the 6.5 limit (31/12/19, 7/01/20 and 9/6/20). This has been thought to be as a result of contamination of sampling equipment. - the sampling system malfunctioned in November and December resulting in no

			<p>sample for week ending 19/11/20, 3/12/20 and 24/12/20.</p> <p>recommendations to achieve compliance have been included:</p> <ul style="list-style-type: none"> - installing an automated sampler to reduce contamination and improve sample integrity. - the discharge system is now automated so that discharge will not occur unless pH is within 6.7-8.3 (allowing for variation).
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To assist you with the interpretation of the report, the compliance grades are:

FULL COMPLIANCE

Your operation is fully compliant with all relevant consent conditions, plan rules, regulations, and national environmental standards.

LOW RISK NON-COMPLIANCE

Your operation is compliant with most of the relevant consent conditions, plan rules, regulations, and national environmental standards. Non-compliance carries a low risk of adverse environmental effects or is technical in nature [e.g. failure to submit a monitoring report].

MODERATE NON-COMPLIANCE

Your operation is non-compliant with some of the relevant consent conditions, plan rules, regulations, and national environmental standards where there are some environmental consequences and/or there is a moderate risk of adverse environmental effects.

SIGNIFICANT NON-COMPLIANCE

Your operation has non-compliance with many of the relevant consent conditions, plan rules, regulations, and national environmental standards where there significant environmental consequences and/or there is a high risk of adverse environmental effects.