

Our ref: DP040143Wa

16<sup>th</sup> April 2014

Ravensdown Fertiliser Co-operative Ltd  
Private Bag 6012  
Hawkes Bay Mail Centre  
**NAPIER 4142**

Attention : Helen Hurring

Dear Madam

**COMPLIANCE MONITORING – DP040143WA - 808 WAITANGI ROAD**

Following my visit on the 24<sup>th</sup> September 2013 to carry out compliance monitoring of the above resource consent for the 2013/14 year, I have compiled your report.

This report identifies some non-compliance and this is reflected in the report's overall grading.

Please note that 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. An account for this monitoring year will be sent after 30 June 2014.

Please contact me should you need to discuss any issues raised in the report.

Yours faithfully



**ANDREW GASS**  
**ENVIRONMENTAL OFFICER - COMPLIANCE**  
**RESOURCE MANAGEMENT GROUP**  
Phone: (06) 833 8030  
Email: [andrewg@hbrc.govt.nz](mailto:andrewg@hbrc.govt.nz)

<b>Consent Holder</b>	Ravensdown Fertiliser Co-operative Limited	<b>Consent No</b>	DP040143Wa
<b>Client Address</b>	Private Bag 6012 Hawke's Bay Mail Centre NAPIER 4142	<b>Site Address</b>	808 Waitangi Road, Awatoto
<b>Contact Name</b>	Helen Hurring	<b>Phone</b>	(06) 834 1769
<b>Job Code</b>	456006	<b>Mobile</b>	021 900 457
		<b>Consent Type</b>	Discharge Permit

**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)

**24-Sep-13** Monitoring Inspection

**Officer** Andrew Gass

**2013-2014 Statement of Compliance and Overall Grades:**

**Grade Date** 15-Apr-14  
**Environmental Grade** Non Compliance  
**Technical Grade** Compliance

**Overall Comments:**

This report applies to the period between 31 July 2013 and 15 April 2014.

The non-compliance relates to condition 4, the discharge has had several exceedences for both Total Phosphorous and Soluble Reactive Phosphorous. Reasons have been provided as to the cause of the exceedences and measures put in place to mitigate them. Improvements have been made to the drainage network to better contain stormwater.

**Previous Statement of Compliance and Overall Grades:**

**Grade Date** 30-Jul-13  
**Environmental Grade** Compliance  
**Technical Grade** Compliance

**Overall Comments:**

Full compliance with the conditions has been achieved.

Refer to back page for grading information

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
1	Technical	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.
	Compliance	29-Aug-12 The Acid Plant is undergoing a major upgrade at present.

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
	Compliance	15-Apr-14 <b>Compliance based on as-built plans, producer statement and visual observations on site.</b>  <b>Stormwater diversion drains have been installed alongside the road by the acid plant to the settling pond.</b>
2	Technical	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.
	Compliance	29-Aug-12 Understood to be the case.
	Compliance	15-Apr-14 <b>Compliance based on as-built plans, producer statement and visual observations on site.</b>
3	Environmental	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).
	Compliance	29-Aug-12 This is the mixing zone for this discharge, as agreed with Hawke's Bay Regional Council Commissioners at the time the consent was granted.
	Compliance	15-Apr-14
4	Environmental	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: <ul style="list-style-type: none"> <li>a) pH to be within 6.5 – 8.5.</li> <li>b) Fluoride not to exceed 30 mg/litre.</li> <li>c) Suspended Solids not to exceed 100 mg/litre.</li> <li>d) Rate of discharge not to exceed 265 litres /second.</li> <li>e) Total phosphorus: <ul style="list-style-type: none"> <li>From the date of the commencement of this consent until 30 June 2012: <ul style="list-style-type: none"> <li><input type="checkbox"/> Over any 12 month period the concentration of total phosphorus shall not exceed 35 mg/litre for more than 95% of the time;</li> <li><input type="checkbox"/> Over any 12 month period the concentration of total phosphorus shall not exceed 40 mg/litre for more than 99% of the time.</li> </ul> </li> <li>From the 1st of July 2012: <ul style="list-style-type: none"> <li><input type="checkbox"/> Over any 12 month period the concentration of total phosphorus shall not exceed 17 mg/litre for more than 95% of the time;</li> <li><input type="checkbox"/> Over any 12 month period the concentration of total phosphorus shall not exceed 22 mg/litre for more than 99% of the time.</li> </ul> </li> </ul> </li> </ul>

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
---------------	-------------------	---

f) Soluble Reactive Phosphorus:

From the date of the commencement of this consent until 30 June 2012:

Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 30 mg/litre for more than 95% of the time;

Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 35 mg/litre for more than 99% of the time.

From the 1st of July 2012:

Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 15 mg/litre for more than 95% of the time;

Over any 12 month period the concentration of soluble reactive phosphorus shall not exceed 20 mg/litre for more than 99% of the time.

Compliance

29-Aug-12

The monthly reports demonstrate full compliance with parts (a) to (d).

Please note that the limits for (e) & (f) changed 1 July 2012. Prior to this date, the results submitted in the monthly reports demonstrate full compliance with the then limit. To date there is only one result relating to the new limits.

Compliance with the new limits will be assessed after 12 months of results, after 1 July 2013.

Non Compliance

15-Apr-14

**The discharge complies with parts a-d of this condition.**

**The discharge has exceeded the standards for parts e) and f).**

**Total phosphorous had 5 of 52 samples >17 mg/l and 2>22mg/l.**

**SRP had 5 of 52 samples >15mg/l.**

**An explanation was provided for the exceedences and measures have been put in place so the discharge meets the required standards.**

5

Technical

The consent holder shall carry out the following monitoring programme at the consent holders expense:

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.

b) A representative, flow-proportional, composite sample (sampled continuously over a period of 24 hours) shall be collected from the sampling station, referred to in Condition 5a, at least once per week and tested for the following parameters:

i) pH;

ii) total phosphorus;

iii) soluble reactive phosphorus;

iv) fluoride;

v) suspended solids

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
---------------	-------------------	---

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.

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:

i) total copper

ii) total zinc

iii) total cadmium

iv) total chrome

v) total aluminium

vi) total sulphur

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.

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).

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).

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.

Compliance

29-Aug-12

Results reported in monthly reports demonstrate full compliance for (a), (b) and the six-monthly tests conducted for (c).

Compliance

15-Apr-14

**A sampling station is maintained.**

**The required sampling is carried out by a suitably qualified person and results provided as required.**

**Samples are analysed at ARL, an IANZ accredited laboratory.**

6 Technical

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:

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

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
		<p>of contaminants within the sediments.</p> <p>Sediments should be analysed for:</p> <ul style="list-style-type: none"> <li>- total copper</li> <li>- total cadmium</li> <li>- total chromium</li> <li>- total zinc</li> <li>- fluoride</li> <li>- total phosphorus</li> <li>- sulphur</li> <li>- sediment composition</li> <li>- nickel</li> </ul> <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 month<sup>1</sup>, 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"> <li>- Temperature</li> <li>- Salinity</li> <li>- Dissolved oxygen</li> <li>- pH</li> <li>- Suspended Solids</li> <li>- Chlorophyll a</li> <li>- Ammoniacal Nitrogen</li> <li>- Nitrate Nitrogen</li> </ul>

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
		<ul style="list-style-type: none"> <li>- Nitrite Nitrogen</li> <li>- Nitrate + Nitrite Nitrogen</li> <li>- Total Nitrogen</li> <li>- SRP</li> <li>- TP</li> <li>- Sulphur</li> <li>- Fluoride</li> <li>- Metals (Al, Cd, Cr, Cu, Zn and Ni)</li> </ul>
		<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>
	Compliance	<p style="text-align: center;">29-Aug-12</p> <p>This survey was conducted in 2011. The consent holder has not received the final document for this survey yet.</p>
	Compliance	<p style="text-align: center;">15-Apr-14</p> <p><b>The four yearly monitoring is not due until 2015.</b></p> <p><b>The required monthly sampling is carried out as per this condition.</b></p>
7	Technical	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.
	Compliance	<p style="text-align: center;">29-Aug-12</p> <p>Council agreed to the monitoring programme prior to the survey being undertaken.</p>
	Compliance	<p style="text-align: center;">15-Apr-14</p> <p><b>The monitoring program was submitted.</b></p>
8	Technical	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.

Condition No.	Type of Condition	Consent Condition and Compliance Assessment
	Not applicable	29-Aug-12 The consent holder has not received the final report yet. Council has agreed to this delay with the consent holder.
	Compliance	28-May-13 Council has received the final report in accordance with this condition. Although the report was not delivered in the timeframe required, Council agreed to this delay.
	Compliance	15-Apr-14 <b>The consent holder provides the results monthly and has included a summary of conclusions with the March monthly report.</b>
9	Technical	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.
		29-Aug-12 Council received the annual report as required. This condition needs to be changed so that the timeframes for the Annual Report are consistent with the Air Discharge annual requirement. (One Annual Report to cover ALL consented discharges on site.
	Compliance	15-Apr-14 <b>The annual report for the period July 2012 to June 2013 was received 7/10/2013.</b>

### Grading Information

Each consent condition has been classified as either a Environmental or Technical condition.

#### **Environmental conditions:**

Environmental conditions set standards/performance limits for a resource consent, or, mitigates an environmental impact of exercising a resource consent.

Examples of environmental conditions are:

- Installation of up-gradient cut-off drains/ placement of disposal fields
- volume limits of discharges
- water take rates and maximum volumes
- discharge or receiving water contaminant limits

#### **Technical conditions:**

Technical conditions sets out technical requirements that allows a consent holder to demonstrate or measure that they meet the Environmental performance required by a resource consent, or help specify the activity authorised.

Examples of technical conditions are:

- sampling effluent/ recording discharge volumes / collating submitting data
- providing of reports/ plans/ designs specifications
- notifications, accreditation, authorities submissions for approval by ER Manager
- installation and maintenance of a water meter

You need to comply with all conditions regardless of whether it's a Environmental or Technical condition.