

23 March 2022

Bay of Plenty Regional Council

PO Box 364

Whakatāne 3158

Attention: Todd Whittaker
Director – Planning Works

Re: AFFCO Rangiuru Consent Application – Response to Issues Raised at Pre-Hearing Meeting

As discussed please find set out below AFFCO's response to issues raised at the pre-hearing meeting held on 22nd February 2022. A number of the identified issues are being resolved over the coming weeks or can be addressed by way of Consent Condition.

Should you require clarification please get back in touch.

Regards,



Luke Gowing

Director

Argo Environmental Limited

cc: Marleen Bosch (BoPRC), Den Tucker (AFFCO), Vanessa Hamm (Holland Beckett)

Consent	Measure	Outcome sought by meeting attendees	Comment from AFFCO
Wastewater Discharge	Land disposal of treated effluent	AFFCO to consider joining Te Puke Wastewater advisory group tasked with exploring land disposal options.	AFFCO is comfortable talking with all parties but ultimately, any final land disposal decision would need to account for the high cost of land purchase and reticulation which has always been the determining factor.
	Wastewater to Te Puke WWTP	AFFCO to approach the District Council to discuss options	AFFCO has discussed this matter with the District Council and has been advised that for hydraulic flow reasons, the Te Puke WWTP (9,000 m ³ /day capacity) would be unable to accept Rangioru's waste flow (6500 m ³ /day dry weather).
	Wastewater to Te Puke WWTP in conjunction with Rangioru Business Park	AFFCO to approach Business Park to discuss options	AFFCO has discussed this matter with the operator of the Business Park and has been advised that the Business Park would be unable to accept AFFCO's wastewater for hydraulic flow reasons.
	Wetland enhancement / pest species eradication – <i>Glyceria maxima</i> is not the most appropriate plant	Perceived role in seeding weed infestations in the downstream catchment	<p><i>Glyceria</i> is widespread throughout the catchment – the Rangioru wetland area is only 3.3 ha in the broader context of a 1,218 ha catchment. <i>Glyceria</i> is a recognised wastewater wetland plant.</p> <p>The wetland was originally designed and installed at the request of iwi for renewal of the previous consent– AFFCO consider the wetland is operating effectively but is open to evaluating whether extra planting / maintenance works is required.</p>
	River signage	Identification of point of discharge for River users	AFFCO accepts this – it is something the Company does elsewhere.
	UV treatment	Commission study to assess potential	UV installations are intended to address pathogen levels –

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		efficacy/costs/etc.	AFFCO considers little additional benefit would be obtained with respect to pathogen reduction at Rangiora given results of pathogen study. Notwithstanding this, AFFCO could undertake a review to provide further information.
	Additional maturation cell	Commission study to assess potential efficacy/costs/etc.	AFFCO considers there would be little additional benefit from an additional maturation cell given high level of treatment at present. Notwithstanding this, AFFCO could undertake a review to provide further information.
	Smell in River	Treat wastewater to remove smell in river	The discharge does not have a smell. This was confirmed in the site visit. The high quality of the discharge in terms of BOD means that it is highly unlikely that the discharge creates smells in the river (usually related to anoxic odour-forming conditions)
	Implications of change in River volume after straightening out at estuary	AFFCO to change discharge to reflect river straightening works.	AFFCO's discharge calculation are based on the flow past the outlet – this remains the case irrespective of works elsewhere in the river.
	Concern about health risks from discharge – including scabies in children	AFFCO to consider health risks including scabies	AFFCO has fully considered pathogens and associated health risks. Scabies are caused by mites - this is not considered to be an issue contributed to by AFFCO's discharge.
	Other discharges to ground and then to the river.	Improve pond structural integrity and seepage to the river	Pond seepage is not currently an issue based on hydrogeological works undertaken by AFFCO.
	Independent review	Independent advisor to look at treatment system	AFFCO would be comfortable with such an approach.

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	Install increased treatment capacity	Reduce nitrogen levels in the discharge. Looking for longer term plan to reduce nutrient loading to river	Increased treatment would undoubtedly reduce contaminant loads, but AFFCO considers that the present configuration is appropriate to avoid adverse effects in the river.
Stormwater	Capture stormwater from roof for use in processing	Reduced take from the river.	The river take is zero net abstraction with no impact on the river. Stormwater capture and use would require storage of stormwater. In any case, this would not a practicable option in dry weather.
	Convene environmental monitoring committee	Monitoring data transparency	AFFCO would be comfortable with such an approach – it would best be considered as part of conditions.
General	Cultural monitoring	AFFCO to explore Te Puke WWTP experience and costs with TCC and whether able to join.	AFFCO is to arrange a meeting with Te Puke WWTP staff to discuss. If scope etc. can be agreed AFFCO could offer this as a consent condition.