

Supplementary Information; Horowhenua District Council's feedback to Levin Landfill Compliance Assessment

Purpose;

The purpose of this supplementary information provides necessary information and facts in relation to compliance rating presented in this report.

Feedback to Compliance Ratings

Below Table only provides feedback information for non-compliant items, which were reported in Table 4 of Catalyst Group Compliance Assessment report.

Table 1; Feedback on areas of non-compliance reported in Table 4 of the report

Consent Number	Condition assessed as non-compliant as per report	Catalyst Group's High level reasons for non-compliance	HDC's feedback
6009	8	HDC is not providing a copy of the hazardous waste log in annual reporting, despite requests by HRC.	HDC do not accept hazardous material at Levin Landfill and has been incorporated in draft LLMP. This has been communicated to Horizons in annual report.
	14	The LLMP was not updated to the satisfaction of HRC by November 2019, as required by this condition. Full assessment of the updated LLMP against condition 14 has not been undertaken as this document was not finalised during the assessment period.	The draft LLMP for New Consents conditions only granted on 19th Dec 19 therefore draft/updated version of LLMP can only be done after. Normal practice is to allow 9-12 months from granting a consent to submitting these type of documents. The draft documents have been submitted to HRC on following dates; - 3rd Feb 2020 - 7th Jul 2020
	33	An independent facilitator for the NLG was appointed on 30 July 2020, which is beyond the timeframe required by condition 33.	The meeting is held within one year timeframe from the last meeting (27 th Aug 19)
6010	3 - Table A	Deep aquifer wells - 2019/20 HDC annual report does not include results for new monitoring site Xd1	Bore installation has completed and will be incorporated in next round of sampling monitoring. It is normal practice to allow 9-12 months from the grant of resource consent to installation of bores. HDC had to go through a lengthy process to get to this position.
	3 - Table B	Shallow aquifer wells - 2019/20 HDC annual report does not include results for new monitoring sites Xs1 and Xs2	Installation of these bores completed and will be incorporated in next round of sampling monitoring. It is normal practice to allow 9-12 months from the grant of resource consent to installation of bores. HDC had to go through a lengthy process to get to this position.
	3 - Table D	Monitoring point locations - Map in 2019/20 HDC annual report does not include new monitoring sites Xd1, Xs1 and Xs2	These locations will be included in the next (January 21) round.

	3U	HDC has not yet invited an NLG nominee to observe sampling rounds.	HDC will ask NLG to nominate someone from the group on 1 st Dec. Please note that this person would need to participate this at his/her own risk. Also note that the samples are taken by an independent person who is/are trained.
	11(aa)	The 2019/20 HDC annual report records exceedances of ANZECC AE 95% trigger values, however it does not provide comment on the significance of the exceedances and whether remedial action is required.	I refer to condition 3(J) 'consent holder should engage with a qualified freshwater expert to assess 24 month water quality monitoring results against trigger values if there is a significant increase in contaminant levels. Same applies for below comment. The elevated levels of iron and manganese are consistent with historic results. Leachate indicator parameters are close to background concentrations indicating negligible impact from leachate in the deep aquifer bores.
	12	The 2019/20 annual report identifies two exceedances but does not comment on the significance of exceedance and whether It can be attributed to landfill leachate.	Same feedback as 11 (aa)
	15	HDC not complying with several conditions relating to the unlined landfill, including evidence of ponding. HDC is also not reporting on the landfill slope or depth of capped cover.	Capping of the landfill had been completed quite a few years ago hence we believe that there is no need to report on this in subsequent years. The condition of the cap is commented on yearly and a survey is done annually to confirm the slopes of the top of the landfill. Remedial works will be carried out before the end of January 2021 as per HRC's recommended action in their assessment report 17-19 period.
6011	4	HDC is not complying with several conditions relating to the Odour Management Plan (which had not been finalised during the assessment period), monthly methane surface monitoring, biofilter operation and maintenance, and data collection.	Gas well monitoring has been ongoing. Methane surface monitoring will be starting soon once remedial plan is established. Please note it has been identified that carrying out remedial work in some locations virtually impossible due to wet ground conditions & H&S concerns.
	7	HDC complaints log does it Include the level of detail required for compliance.	Complaint log was submitted to Horizons on 4 th Sept. 20

	7	HDC is not complying with several consent conditions meaning it is not taking all practical steps to avoid, remedy or mitigate odour effects.	I feel this is very harsh comment where we are taking all the practical steps to remedy anything that requires attention. Some of these conditions are very impractical, not possible during some weather conditions as it is unsafe to perform certain activities.
	8A	HDC had not nominated a liaison person and advised HRC accordingly within the period of this assessment.	Currently this is observed however a consolidated odour complaint process would be established.
	8D	HDC is not undertaking monthly odour investigations beyond the site boundary.	HDC is undertaking odour assessments at Levin Landfill boundary. The draft OMP sets out the monitoring requirements under 8D which have been coupled with the requirements under condition 3. HDC has undertaken monitoring in compliance with this requirement, as reported on in section 9.1 of the Annual Report. The monitoring positions are at the very edges of the property boundary. Monitoring beyond the boundary makes no sense since this would be even further away from the landfill. Additionally, this would require monitoring on private land. The procedure outlined in the OMP is considered a practical application to comply with condition 8D.
	8F	The 2019/20 annual report for consent 6011 does not include the complaints log, which is considered to fall within scope of condition 8F reporting requirements.	There is no requirement to provide a copy of the complaints log in the Annual Report, so this should not trigger a non-compliance. However, this information was provided at a request of HRC.

Table 2; Feedback on areas of further information requirements to assess compliance reported in Table 5 of the report

Consent Number	Condition	Catalyst Group's request 'Information required to assess compliance'	HDC's feedback
6009	6	HDC documented process for recording incidences of noxious weed control as well as measures taken within 2019/20 to confirm compliance with this condition.	Annual noxious weed control are taken place.
	15-22	Details regarding the method for disposal of offal and dead animal waste to confirm compliance with these conditions.	This is in LLMP and process has been implemented.

	23-25	Details regarding biosolids and sludges disposed at the landfill in 2019/20 including the waste log to confirm compliance with these conditions.	HDC do have a system in place for recording these information and have provided a record to HRC for that reporting period
6011	8B	Details confirming 2019/20 complaints were investigated within 24hrs of being received.	Any complaints that we received within Solid Waste team attended in a timely manner. However, not all complaints have come through the directly to Solid Waste team including HRC. Complaints are necessarily received in timely manner i.e. after 24 hours. There is a requirement for consolidated odour complaint process improvement.
102259	4	Details confirming all stormwater structures have been designed and constructed to best engineering practices and maintained to a safe and serviceable standard.	Any stormwater system is designed and installed as per standards. Stormwater management plan has been incorporated into the draft LLMP.
	5	Confirmation that the stormwater system is being inspected once a day.	This should be done on a regular basis during rainy events.
	6	Confirmation that the stormwater soakage ponds are inspected and maintained regularly.	This has been incorporated in draft LLMP also currently being observed.