



**NAPIER**  
CITY COUNCIL  
*Te Kaunihera o Ahuriri*

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# ORDINARY MEETING OF COUNCIL

## Open Attachments (Under separate cover)

### Trade Waste & Wastewater Bylaw Review and Water Supply Bylaw Review Hearings

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Meeting Date: Wednesday 22 June 2022

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Time: 9.00am

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Venue: Ocean Suite  
East Pier  
50 Nelson Quay  
Napier

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*Some information has been redacted in the following attachments in accordance with the Local Government Official Information and Meetings Act 1987, S7(2)(a) – that the privacy of natural persons, including the deceased, should be protected.*

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## WATER SUPPLY SUBMISSIONS

**Submission #1**Name: **Chad Tareha**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**



## Submission #2

Name: **Morgan Conneely**

Organisation:

Suburb: **Bluff Hill**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

### Do you support the expanded trade waste consenting requirements?

Yes

### Please provide any further comments on trade waste consenting requirements

If the general consensus among the "18 attendees representing 16 sites holding current trade waste consents" in 2021 was agreement with the proposed changes, that would imply to me that the proposed changes need to be increased in scope and ambition as they are not revolutionary or effective enough.

### Do you support phasing implementation to allow greater time for compliance to be achieved?

No

### Please provide any further comments on the timing of new regulations being implemented

Polluters should absolutely not be granted grace periods for compliance. Zero tolerance policy must be enforced regarding environmental law.

### Do you support the revised Trade Waste charging model?

Yes

### Please provide any further comments on the revised charging model

Permitted Trade Waste should be removed as a category. All Trade Waste should require consent. Any occurrences of accidental or deliberate discharge of waste into the taxpayer and ratepayer-paid Public Wastewater System (as have notably happened in recent years) must be stamped out entirely.

### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

Yes

### Please provide any further comments on the introduction of WasteTrack

### Do you support the requirement for food premises to have properly maintained grease traps?

Yes

### Please provide any further comments on grease trap requirements

Council should keep full records of servicing and inspections, with significant consequences for businesses who fail to abide by the bylaw, as a deterrent.

**Please provide any further comments on the proposed Bylaw**

Microplastics are the largest cause of concern that are currently not adequately covered by this bylaw. Sale of "flushable wipes" and like products should be banned to prevent damage to public wastewater infrastructure. Some form of small grease trap should be required in plumbing for new developments for the same reason, placing the expense and remediation of the issues caused back onto the home-owner/business-owner, as it should be. Internal compliance by the Council of its own waste should be rigorously enforced. Hand-washing stations and sinks in commercial and industrial workplace produce significant hazardous particulates (metal dust, wood dust, plastic shavings etc) that should be caught by an adequate filter before the contaminated water reaches public pipework - again, cost absorbed by the polluters. Has the charging model submitted by BPO been independently verified as sufficient? Public sentiment is that business does not pay its fair share in waste costs and is subsidised by residential ratepayers.

### Submission #3

Name: **Penelope Isherwood**

Organisation:

Suburb: **Taradale**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented**

Things will only continue if time is extended

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Those who do most harm should pay more.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

**Please provide any further comments on the proposed Bylaw**

**Submission #4**Name: **Rebekah Mitter**

Organisation:

Suburb: **Pirimai**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**  
absolutely support this.**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**  
Should have been done a long time ago.**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**  
good idea!**Please provide any further comments on the proposed Bylaw**

**Submission #5**Name: **Elviena Collins**

Organisation:

Suburb: **Ahuriri**Attachments Y/N: **No**

Do you want to speak at the hearing?

**Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

## Submission #6

Name: **Nicholas Eddy**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

### Do you support the expanded trade waste consenting requirements?

Yes

### Please provide any further comments on trade waste consenting requirements

Given the challenges our environment faces with a growing population and more wasteful resources that humanity uses it is important that Council is very active and proactive in managing solutions for future generations.

### Do you support phasing implementation to allow greater time for compliance to be achieved?

Yes

### Please provide any further comments on the timing of new regulations being implemented

### Do you support the revised Trade Waste charging model?

Yes

### Please provide any further comments on the revised charging model

100% the heavy use operators need to be more accountable on their impacts of trade and business. it should not be a general rate but a targeted rate.

### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

Yes

### Please provide any further comments on the introduction of WasteTrack

### Do you support the requirement for food premises to have properly maintained grease traps?

Yes

### Please provide any further comments on grease trap requirements

### Please provide any further comments on the proposed Bylaw

**Submission #7**Name: **Ann Logan**

Organisation:

Suburb: **Bluff Hill**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

Companies should not be able to discharge into the estuary.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented**

This work needs to be undertaken as a matter of urgency before any more environmental damage takes place.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

You make it you pay for it

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

We need to know where things are going.

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

Te Whanganui a Orotu (Ahuriri Estuary) was identified by the Hawkes Bay Regional Council as an Outstanding Water Body under the National Policy Statement for Freshwater. Consequently it should be protected as the precious waterbody that it is. The outstanding values it was identified for are identified below and need to be protected for future generations to come. Te Whanganui a Orotu is a significant wetland located next to the city of Napier.

Historically it was the mouth of the Tutaekuri and Esk Rivers, and covered a much larger area than it does today. Additionally, the 1931 Hawke's Bay earthquake lifted the land by 1-2 metres and exposed about 1300 ha of the original Ahuriri lagoon. Although in a degraded state the estuary provides a wide diversity of habitats, and an associated diverse range of ecological communities which are all contained within a relatively small area. It is listed as a Significant Conversation Area in the Regional Coastal Environment Plan. Three Treaty settlement entities have customary linkages to Te Whanganui-a-Orotu - Ahuriri Hapu, Ngati Pahauwera and Maungaharuru-Tangitu. In particular, Te Whanganui-a-Orotu: a. is a place of great cultural and spiritual significance to the Ahuriri hapu and is central to their existence and identity. Ahuriri hapu has a long history of settlement in Te Whanganui-a-Orotu; its significance is conveyed in song and story, reciting the names of ancestors, kaitiaki and events. It is named after the ancestor Te Orotu, who was a descendant of the great explorer and ancestor Mohu Tapoanui, who is the very beginning of the Ahuriri people.

b. was a significant mahinga kai for Ngati Pahauwera who regularly travelled from Mohaka to the Estuary. A Ngati Pahauwera pa and kainga are located at the northern end of Te Whanganui-a-Orotu and graves of Ngati Pahauwera ancestors are located on islands previously in Te Whanganui a Oroti.

c. Maungaharuru Tangitu: the estuary was a vitally important fishing and resource-gathering area for hapū. The area around Te Whanganui-a-Oroti was a very important source of food and was heavily populated. Consequently, numerous sites of cultural, historic and archaeological significance are situated around what was its shoreline. From the earliest of times it was highly prized for its food resources and its access to major river systems and forest areas. It was known as 'a place of abundance'. So greatly was it valued through the generations that songs were sung, poetry composed, and dances created in praise of its productiveness. Archaeological evidence confirms that Te Whanganui-a-Orotu was an important place to live. Excavations indicate settlement dates between the late fifteenth and early seventeenth centuries, with very early settlement on Roro o Kuri - somewhere between the twelfth and thirteenth centuries. Surrounding the harbour are 11 recorded pa, some extensive in size. Extensive middens exist in this area. It was the scene of many battles. The cultural and spiritual values of Te Whanganui a Orotu are also strongly recognised in several Waitangi Tribunal reports. The Ahuriri Estuary has outstanding wildlife values, particularly as a feeding and resting area for over 70 species of aquatic birds, some of which are critically endangered and some which migrate every year from the Arctic. In particular the estuary: a) supports the highest diversity of waterbirds in Hawke's Bay, including seven threatened species, three of which are classified as nationally critical on the NZTCS. It is also a significant breeding ground for a number of endangered species. b) is used by over 70 species of waterbirds, 17 of which migrate every year from the Arctic. Of particular note are the Australasian bittern, black billed gull, and shore plover, which are classified as endangered on the IUCN red list, and Nationally Critical on the NZTCS. c) is a vital summer feeding ground for migrating eastern bar-tailed godwits who migrate each year from Alaska, and the lesser knot who migrate from Siberia. Both species are classified as near threatened on the IUCN red list and Nationally Vulnerable on the NZTCS. d) Supports high numbers of banded dotterel, Caspian tern (1% of the regional population) and Australasian bittern (11% of the regional population). The Ahuriri Estuary also has outstanding value for native fish. Its habitats support the highest diversity of native fish in the region, a significant proportion of



which rely on the estuary to breed and feed, and is recognised as the most important estuary in the region for fisheries production. In particular the estuary makes a significant contribution to Hawke's Bay marine fisheries by providing nursery and spawning habitats and feeding areas for species which migrate between freshwater and the sea. Additionally, it meets the RAMSAR criteria as a wetland of international importance due to its diverse assemblage of fish species and its biologically important fish habitat, particularly as a breeding ground and nursery for a number of species of fish. Te Whanganui-a-Orotu has outstanding cultural and spiritual values to t?ngata whenua, and provides diverse habitats that support the best aquatic bird habitat, and the best estuarine fish habitat and nursery in the region, and as such all measures must be taken as soon as soon as possible to protect this treasure.

**Submission #8**Name: **Juliet Greig**

Organisation:

Suburb: **Napier South**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

Needs to have a grace period. eg: Jan. 1st, 2025 for compliance. Napier Council could run compulsory tours of the Napier wastewater plant at Waitangi Road, specifically for cafe/restaurant/bar personnel, to show the effects of oil and fat deposits in the pipes. There could also be an educational video made and sent to cafe/restaurant/bar personnel, so they understand the implications of putting fat and oil down the pipes. We went on the Napier wastewater plant tour this morning; it was very informative and eye-opening to see what happens to our wastewater. Thank you Napier council!

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Good idea. This would need enforcement and monitoring.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Yes, this is very important. Lack of grease traps can cause massive plumbing and hygiene issues.

**Please provide any further comments on the proposed Bylaw**

The Bylaw needs to be backed up by the government with appropriate legislation so that it has "teeth". The ideas are good, but they need to be properly enforced.

## Submission #9

Name: **Andrew Jarmin**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

### Do you support the expanded trade waste consenting requirements?

Yes

### Please provide any further comments on trade waste consenting requirements

I believe a bit of carrot and stick would work best with this. Being able to fine industries that are excessively polluting where the fines will actually hit them in the pocket -is the stick side of things. Having a reduced rate of compliance charge to those industries that reduce their burden on the infrastructure is the carrot side. No subsidies though,( ie. no payments to them for compliance) they'll need to comply irrespectively.

### Do you support phasing implementation to allow greater time for compliance to be achieved?

Yes

### Please provide any further comments on the timing of new regulations being implemented

A cut-off date for compliance of the 1st of January 2025 should be ample time for Industries to sort themselves out.

### Do you support the revised Trade Waste charging model?

Yes

### Please provide any further comments on the revised charging model

Possibility of providing low interest loans, to implement various waste -burden reducing measures to industries, would be a win -win for the council and industries ,if they could be shown how it would reduce their operating costs in the long run.

### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

Yes

### Please provide any further comments on the introduction of WasteTrack

Provided the tracking was done cost effectively, I think this is a good idea. However there are some over -priced tracking methods ,eg Monthly subscription charge options that should be avoided.

### Do you support the requirement for food premises to have properly maintained grease traps?

Yes

**Please provide any further comments on grease trap requirements**

I thought that this aspect was covered by the Building code, and to operate this type of Business they'd have to comply with the code anyway?

**Please provide any further comments on the proposed Bylaw**

Hope the bylaws have some teeth.

**Submission #10**Name: **David Small**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

More responsibility on businesses will give more space for council to do other work

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

Businesses will need time to upgrade their filtration systems

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #11**Name: **Tony Carstens**

Organisation:

Suburb: **Westshore**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

user should pay

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #12**Name: **Karen Taotahi**

Organisation:

Suburb: **Bay View**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Trade firms should pay all the costs, not ratepayers

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**



**Submission #13**Name: **H Moore**

Organisation:

Suburb: **Maraenui**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #14**Name: **Karen Clarkin**

Organisation:

Suburb: **Meeanee**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #15**Name: **Jesse O'Connor**

Organisation:

Suburb: **Tamatea**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

Hazardous waste by law should already be tracked and disposed of properly. Eg. beards environmental. Or is this the council trying to clip the ticket.

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Should be regular maintenance for their waste produced. Petrol stations have interceptors tanks, so other business should as well.

**Please provide any further comments on the proposed Bylaw**

Plenty for domestic use.

**Submission #16**Name: **Adnan Hasnain**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

No

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

No

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #17**Name: **Karl Matthys**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

Commercial waste is permitted in the city sewer system only if treatment plant can handle it.  
The cost of treating problem waste needs to be borne by the industry producing this waste.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

sounds good

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

agree

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

not sure what this is but monitoring industrial waste is a must.

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

agree

**Please provide any further comments on the proposed Bylaw**

long overdue

**Submission #18**Name: **Chris Clarke**

Organisation:

Suburb: **Hospital Hill**Attachments Y/N: **No**

Do you want to speak at the hearing?

**Do you support the expanded trade waste consenting requirements?**

No

**Please provide any further comments on trade waste consenting requirements**

Without making a direct complaint, what I would like to see is your proposals in plain English and how it's going to affect the various people and the population in general. I've supported a number of proposals, but it seems the proposals from council aren't always clear. Point in question, what on earth is happening to our roads at the moment. Millions have been spent on making better and wider roads to help speed up traffic flow. Now we're left to wonder why the roads are being dug up from the Ahuriri roundabout to the "twin" roundabouts at the top of Prebensen and Taradale Rd. Is it another "slow down" by reducing the flow to single lane again? It's really unacceptable. You have my details above and I would appreciate a response. Many of us are sick to the back teeth of council's "good idea" stream that's actually detrimental to Napier, and is worse than a few years ago.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented**

They're not fully understood and council needs to be more open about what's going to happen so the proposals are fully understood by everyone, how they affect us, and their ongoing costs to the ratepayers.

**Do you support the revised Trade Waste charging model?**

No

**Please provide any further comments on the revised charging model**

I have no idea what's going to happen with it.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

**Please provide any further comments on the proposed Bylaw**

**Submission #19**Name: **Bruce Salisbury**

Organisation:

Suburb: **Marewa**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

No

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

No

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**



**Submission #20**Name: **Connie Moroney**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

Trade be required to sort waste and separate, recycling, waste wood and bio hazard paints, glues etc

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

No

**Please provide any further comments on the timing of new regulations being implemented**

We don't have the luxury of time. Lazy "chuck it in the bin" attitude needs to be stamped out immediately.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Fines for failing to comply Rewards for consistent compliance

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Regular council officer spot checks without warning

**Please provide any further comments on the proposed Bylaw**

**Submission #21**Name: **John Nielsen**

Organisation:

Suburb: **Pirimai**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Some. Not all will afford the cost structure required - Eg. Small cafe`s etc.

**Please provide any further comments on the proposed Bylaw**

## Submission #22

Name: **Andrew Condon**

Organisation: **bStudio Ltd**

Suburb: **Ahuriri**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

### Do you support the expanded trade waste consenting requirements?

Yes

### Please provide any further comments on trade waste consenting requirements

Any business who has Trade Waste needs to be part of the consent process. How can we get a coherent and realistic plan for Trade Waste from Central Government and Regional councils? It feels like the consent limits will continue to be reduced far in advance of the infrastructure needed to deliver within those limits from those to "remote" bodies.

### Do you support phasing implementation to allow greater time for compliance to be achieved?

Yes

### Please provide any further comments on the timing of new regulations being implemented

Many businesses are finding it extremely tough due to inflation, lack of qualified staff etc. and this makes further costs and investment very difficult if not impossible for the next 2 years. Having a phased and inclusive roll out will greatly assist in co-operation and over time better results.

### Do you support the revised Trade Waste charging model?

Yes

### Please provide any further comments on the revised charging model

As above if any business has Trade Waste entering the Council System then they should contribute to operating costs. As long as the charging is fair.

### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

Yes

### Please provide any further comments on the introduction of WasteTrack

I support this but as long as the Tanker Operators are being consulted and that they in turn can consult their customers.

### Do you support the requirement for food premises to have properly maintained grease traps?

Yes

### Please provide any further comments on grease trap requirements

**Please provide any further comments on the proposed Bylaw**

There is no doubt we need to act as the Council system is not fit for purpose and if we all share in the costs and the problem then in theory real progress can be made. Unfortunately there is no business that has any direct benefit to their bottom line for Trade Waste Treatment, it is an additional cost of business so in the current climate yet another hit to business. Please understand that, and we can move forward and make improvements at a realistic pace.

### Submission #23

Name: **Malcolm Ballantine**

Organisation:

Suburb: **Taradale**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

#### Do you support the expanded trade waste consenting requirements?

No

#### Please provide any further comments on trade waste consenting requirements

Just another income stream for the NCC.

#### Do you support phasing implementation to allow greater time for compliance to be achieved?

No

#### Please provide any further comments on the timing of new regulations being implemented

Absolutely disgusting as this activity causes Rate increases. You need to witness and reallocate the wasteful duplication of wastewater services with NCC outlet at Awatoto and a 15 minute bike ride along the coast is The Hastings District Council outlet. In the real world businesses merge or have a unified approach to infrastructure. When you read this proposal its clear see the ridiculous hours that are being charged by lawyers to publish a report defending NCC's out of touch ideas. The decision to proceed has already been made. My experience stepping into the ring to object to the Maori increase in councillor numbers realised it was a exercise in futility to object, I soon became aware that the decision had been made to proceed before the public submissions were notified. Get real NCC . Go talk to HDC ,merge your ideas and then put a proposal to the Ratepayers of Napier. People are struggling because of this practice of wasteful duplication. I'm now thinking that perhaps the Governments 3 Waters proposal isn't so stupid.

#### Do you support the revised Trade Waste charging model?

No

#### Please provide any further comments on the revised charging model

Just another nail in the coffin of local businesses. Can't you people see how many locally owned trade businesses that have to process this waste , have disappeared over 20 years. Why ,because it's cheaper to operate in other areas with only a branch servicing Napier. I'll use this particular question one day in a meeting to show how anti business NCC really are. Look at the increased cost of transport into Napier because you didn't stand up and angrily stop the speed restrictions on Taupo Road. Local Businesses expected you to do it. You failed and now you want to tax them even more.

#### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

No

**Please provide any further comments on the introduction of WasteTrack**

More Cost .

**Do you support the requirement for food premises to have properly maintained grease traps?**

No

**Please provide any further comments on grease trap requirements**

Get Real you Lot. This is just jealous socialism created by Public Servants.

**Please provide any further comments on the proposed Bylaw**

I'm very angry. Why can't you look at the real costs of your ridiculous spending and the damage it's causing. Do what the rest of us do. Live within your means. Suggestion Each year Increase Rates etc income by 3.5%. Then reduce all NCC expenditure by 3.5% The people of Napier need some relief from NCC unnecessary spending..

**Submission #24**Name: **John Stewart**Organisation: **LegaSea Hawkes Bay**Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #25**Name: **Rose Annear**

Organisation:

Suburb: **Napier South**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

We collectively need to be more scrupulous in insuring our daily behaviors don't damage our environment

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

Asap

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

If we are releasing pollutants into our aquatic systems we need to be charged accordingly

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

Its common sense

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Go grease traps

**Please provide any further comments on the proposed Bylaw**

Please DO ALL YOU CAN TO CLEAN UP THE ENVIRONMENT WE LIVE HERE WITH MANY OTHER CREATURES and the delicate equilibrium is clearly out of balance for all of my lifetime. We need to ensure that our lifestyles reflect ongoing environmental protection. Not just as goals and aims. But in day to day living.



## Submission #26

Name: **Ian Barns**

Organisation:

Suburb: **Greenmeadows**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

### Do you support the expanded trade waste consenting requirements?

Yes

### Please provide any further comments on trade waste consenting requirements

### Do you support phasing implementation to allow greater time for compliance to be achieved?

Yes

### Please provide any further comments on the timing of new regulations being implemented

The phasing in of bylaw changes is a common sense approach especially when there will be increased costs and compliance costs that go with the changes. Businesses are struggling and phasing in will make it easier for businesses to be able to comply and survive.

### Do you support the revised Trade Waste charging model?

Yes

### Please provide any further comments on the revised charging model

Comments as above

### Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?

Yes

### Please provide any further comments on the introduction of WasteTrack

More important than ever to be able to track what and where hazardous wastes are being disposed and what types of waste are being disposed.

### Do you support the requirement for food premises to have properly maintained grease traps?

Yes

### Please provide any further comments on grease trap requirements

I would have thought that this would already be a requirement of the council. Again I have seen the benefits of grease traps and the sooner they are required the better for all.

### Please provide any further comments on the proposed Bylaw

**Submission #27**Name: **Jodi Baxter**

Organisation:

Suburb: **Pirimai**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

We need to be working towards a system where the environment is never a trade-off. To move from "polluters taking responsibility" and all of us "doing less harm" to truly sustainable and regenerative systems.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

Nothing on timing but support for businesses to undergo change management should be considered.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Charging model should channel funds into restorative and regenerative systems.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #28**Name: **Jennifer Leadley**Organisation: **New Zealand Trade and Industrial Waters Forum**City: **Christchurch**Attachments Y/N: **Yes**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

WasteTRACK tracks liquid and hazardous wastes from generation, through transport to treatment and/or disposal (cradle to grave). Wastes are tracked from the generator to the ultimate disposal location, which is accurately documented in a secure database. Tracking data is readily accessible for select relevant Council personnel to review and check, thereby ensuring the wastes are correctly removed from trade waste consent holders such as the grease traps at food outlets. WasteTRACK as part of the Code Compliancy Programme will also reduce the potential for illegal disposal activities, which will benefit the wider region.

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

New Zealand Trade and Industrial Waters Forum support the inclusion of the requirement for Tankered Waste Operators to be code-compliant with the Liquid and Hazardous Wastes

Code of Practice as proposed in Section B.7.12 of the Trade Waste and Wastewater Bylaw, and Section B.5 Tankered Waste, of the Administration Manual.



### **Proposed Napier City Council Trade Waste and Wastewater Bylaw 2022**

New Zealand Trade and Industrial Waters Forum (NZTIWF) **support** the inclusion of the requirement for Tankered Waste Operators to be code-compliant with the Liquid and Hazardous Wastes Code of Practice as proposed in Section **B.7.12** of the Trade Waste and Wastewater Bylaw, and Section **B.5** Tankered Waste, of the Administration Manual.

The Liquid & Hazardous Code of Practice is an industry driven standard that is administered and overseen by NZTIWF and its industry-based Certification Council.

To become code compliant with the Liquid & Hazardous Code of Practice an independent audit of the liquid waste contracting company is undertaken by a trained systems auditor. The audit of the company is to ensure that the company is complying with all sections of the Code of Practice. If the company meets the requirements that are set out in the Code of Practice a recommendation for that company to become code compliant is sent to the Certification Council for formal acceptance. The Certification Council reviews recommendations for code compliancy.

The Liquid and Hazardous Waste Operators Certification Council Code Compliancy Programme has been developed to accredit providers and to certify services. Consumers can be confident that services supplied by Liquid and Hazardous Waste Operators Certification Council registered companies are reliable and of high quality and do not pose hazards to the environment, safety or personal welfare.

**Submission #29**Name: **Anna Blah**

Organisation:

Suburb: **Taradale**Attachments Y/N: **No**

Do you want to speak at the hearing?

**Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**Submission #30**Name: **Kim Maitland**Organisation: **Hawke's Bay District Health Board**Suburb: **Napier South**Attachments Y/N: **Yes**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

See attached submission

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

See attached submission

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

See attached submission

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

See attached submission

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

See attached submission

**Please provide any further comments on the proposed Bylaw**

See attached submission

## Corporate Services



24<sup>th</sup> May 2022

Napier City Council  
Private Bag 6010  
Napier 4142

Our Ref: SUB007 22

TO WHOM IT MAY CONCERN

### **PROPOSED TRADE WASTE & WASTEWATER BYLAW 2022**

Thank you for the opportunity to comment on the draft proposed bylaws for Trade Waste & Wastewater and the accompanying Draft Administration Manual.

The Hawke's Bay District Health Board (HBDHB) has a responsibility under the New Zealand Public Health and Disability Act 2000 to advocate for environmental conditions that contribute to the health of the community.

HBDHB **supports** the introduction of an integrated Trade Waste and Wastewater Bylaw and the draft Administration Manual.

The DHB supports the intention to extend trade waste requirements to smaller premises generating fats and other contaminants that create downstream health and network management issues. We are also supportive of Clause A.13 "Protecting the Public Wastewater System" which aims to prevent any Stormwater, groundwater or Trade Waste entering the Public Wastewater System through Infiltration or Inflow, surface water run-off or overland flow.

Stormwater infiltration is likely to be a significant factor contributing to raw sewage wastewater overflows into the receiving environment and in particular the Ahuriri Estuary where contact recreation and Mahinga kai gathering are important cultural practices enjoyed by our Hawkes Bay community.

If not already planned, we recommend that following the adoption of this bylaw that Council allocates funding to undertake a program of works that includes physical surveys of residential and commercial properties stormwater infrastructure in order to determine and address stormwater connections to wastewater networks.

We note that Wairoa District Council has implemented such a program in recent years whereby Council officers visit home by home to review stormwater drainage and ensure connections to wastewater infrastructure networks aren't occurring. This program of works has had significant



success in identify multiple illegal connections that were contributing significant volumes of stormwater to the wastewater network. The positive effect of this work program has been to significantly reduce the occurrence of wet weather discharges of raw sewage to the Wairoa River as the wastewater network is now managing much lower flow rates enabling wastewater flow to the treatment plants to be maintained.

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'Jones', with a stylized flourish at the end.

Dr Nicholas Jones/Simon Baker  
Medical Officer of Health  
Hawkes Bay District Health Board

**Submission #31**Name: **Angela Denby**Organisation: **Ahuriri Estuary Protection Society**Suburb: **Napier South**Attachments Y/N: **No**Do you want to speak at the hearing? **Yes****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

Very important that this applies to all businesses/industry in Napier, not just the big polluters.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

This allows time for business/industry to learn what their responsibilities are, research appropriate solutions to their issues, and put into action. Important to avoid failures. Currently there is a lack of staff to do all that is required. At least 3 new Tradewaste officers are required to get these Bylaw changes established in the community.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

Only fair, as the pollution/blockage issues tend to come from business/industry.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

Heard today of a liquid waste truck (Bay Of Plenty) where driver couldn't be bothered going to depot so dropped his load of waste into a waterway. WasteTrack would deter drivers from this behaviour.

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Considering that NCC are called out to blockages in CBD most weekends, this is a vital requirement.

**Please provide any further comments on the proposed Bylaw**

Ahuriri Estuary Protection Society have been asking for trade waste to be treated at source for decades. Thank goodness this is developing. Education is important. Also building relationships with industries and businesses. Consequences of polluting waterways are important also, otherwise where is the deterrent? You don't need to re-invent the wheel - research and investigating projects already underway in other areas of NZ and overseas is valuable time spent. Climate change is here. We still need to protect Ahuriri Estuary from the 'Emergency' Discharges of mixed Stormwater/Wastewater at times of high or persistent rainfall. How are you going to do that?

**Submission #32**Name: **Ollie Doherty-Ramsay**Organisation: **The Fuel Companies (Z  
Energy, BP Oil, Mobil Oil)**City: **Auckland**Attachments Y/N: **Yes**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

See attached.

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?****Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?****Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?****Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?****Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

**SUBMISSION TO NAPIER CITY COUNCIL PROPOSED INTEGRATED TRADE WASTE AND WASTEWATER  
BYLAW 2022**

**To:** Napier City Council  
Attn: Trade Waste Bylaw  
Private Bag 6010  
Napier 4142

Via online form at [www.sayitnapier.nz](http://www.sayitnapier.nz)

<b>Submitter:</b>	Z Energy Limited <sup>1</sup>	BP Oil NZ Limited
	PO Box 2091	PO Box 99 873
	<b>WELLINGTON 6140</b>	<b>AUCKLAND 1149</b>
	Mobil Oil NZ Limited	
	PO Box 1709	
	<b>AUCKLAND 1140</b>	

*Hereafter, collectively referred to as the Fuel Companies*

**Address for Service:** 4Sight Consulting Limited  
PO Box 911 310  
Victoria Street West  
**Auckland Central 1142**

Attention: Ollie Doherty-Ramsay

Phone: [REDACTED]  
Email: [REDACTED]

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<sup>1</sup> On behalf of the wider Z Group, including the Z and Caltex operations in New Zealand.

## INTRODUCTION

1. Napier City Council (*Council*) is seeking submissions on the Proposed Trade Waste and Wastewater Bylaw 2022 (*the proposed bylaw*) that will replace the revoked Wastewater Drainage Bylaw 2014 and the existing Trade Waste Bylaw 2014 (*the operative bylaw*).
2. The Fuel Companies receive, store, and distribute refined petroleum products around New Zealand. The core business of the Fuel Companies in Napier relates to the storage and distribution of petroleum products and operation of retail fuel outlets, including service stations and truck stops. The Fuel Companies' interest in the proposed bylaw relates to trade waste and in particular how it addresses discharges from car washes.
3. This submission responds to the proposed bylaw and draws on the experience of the Fuel Companies operating under a range of trade waste bylaws around the country.
4. The Fuel Companies do not wish to be heard in relation to this submission.

## PROPOSED BYLAW

### *Trade waste categories*

5. The proposed bylaw includes permitted, controlled, conditional and prohibited categories. These are generally supported, with the notable exception of the requirement that 'Permitted Trade Waste' meets Schedule A requirements **without pre-treatment**. That definition is as follows (Fuel Companies' emphasis in bold):

*Permitted Trade Waste means Trade Waste that meets the physical and chemical Characteristics as defined in Schedule A of the Administration Manual **without Pre-treatment** and has a discharge volume of less than 5 m<sup>3</sup> /day and a flow of less than 2 L/s.*

6. In requiring discharges to meet the Schedule A characteristics without treatment, most discharges from trade waste premises will require at least a controlled consent, irrespective of whether what is discharged complies with Schedule A. For instance, a commercial kitchen which has a grease trap to provide a degree of treatment of oil and grease, may well not comply without such a device and would therefore require a conditional trade waste permit. This is reflected in the broad definition of pre-treatment in the proposed bylaw:

*Pre-treatment means any processing of Wastewater or Stormwater designed to reduce or vary any Characteristics before discharge to the Public Wastewater System.*

7. This approach contrasts with the operative bylaw which defines 'Permitted Discharge' as set out below and appropriately focuses on what is discharged:

*Means a Trade Waste discharge that has been approved by, or is acceptable to, the Wastewater Authority; providing it has physical and chemical Characteristics which comply with the requirements of the Wastewater Authority standard in Schedule 2 of this bylaw.*

8. The Council's rationale for this approach is not addressed in the statement of proposal despite it being a significant shift and one which would appear to necessitate at least Controlled Trade Waste consent for any discharge which relies on pre-treatment to achieve appropriate quality. At least in the context of discharges from car washes, the Fuel Companies consider this new approach is not justified. The Fuel Companies expect that other parties may have taken the statement of proposal at face value and not anticipated that what are currently permitted discharges may require controlled trade waste permits in due course.
9. Discharges from modern car wash facilities include both pre-treatment and water recycling. This typically includes sumps that provide initial settlement of coarse sediments and proprietary oil/grit interceptor to reduce both suspended solids and hydrocarbons. Typically, 65-90% of wastewater is recycled for reuse within the car wash, with the remainder discharged to trade waste.
10. These devices enable the Fuel Companies to comply with the requirements of Schedule A subject to appropriate operation and maintenance, which is addressed via robust procedures, for instance the Trade Waste Management Plan operated by BP which is attached to provide an example of how these discharges are managed by the Fuel Companies. The Fuel Companies have comprehensive monitoring records over an extended period demonstrating the same. This is reflected in the BP Trade Waste Management Plan which summarises 11 years of data across the BP Connect carwash network. The data demonstrates the quality of water discharged and shows no exceedances of typical trade waste limits. This data is summarised at Table 3 of the plan, which is included below for completeness, with further detail provided at Appendix E of the attached Trade Waste Management Plan.

**Table 3: bp carwash water quality sampling (TPH, pH, TSS) summary 2010-2022**

	TPH g/m3	pH	TSS g/m3
<b>Compliance limits*</b>	<b>50</b>	<b>6.0-9.0</b>	<b>600</b>
Average	9.20	6.97	38.46
Min	0.5	6.2	6.1
Max	48	8.0	83.0
Exceedances	0	0	0
# Sites	39	39	5
# Samples	163	157	37

**Notes:**

TPH = Total Petroleum Hydrocarbons

TSS = Total Suspended Solids

\* Compliance limits are based on Hamilton City Council trade waste consent thresholds

11. The Fuel Companies are concerned that that the Council's proposed approach of making Schedule A compliant discharges obtain at least controlled trade waste permits will be a precursor to unnecessary monitoring requirements when the focus should be on ensuring these proprietary devices are

appropriately operated and maintained. The Fuel Companies consider that these discharges should be permitted, noting that permitted discharges are subject of a registration process and require an Approval Notice.

12. In line with the operative bylaw and notwithstanding that the Fuel Companies do not consider car wash discharges require ongoing monitoring due to well documented compliance history, permitting these such discharges does not preclude Council monitoring or charging for the same.
13. To require at least controlled trade waste permits would not appear to be effects based, will be significantly more onerous than what is provided for currently, and will likely lead to inconsistent application of the proposed bylaw. While Council may see that it reduces its risk, it is not an approach that will help support appropriate activities and it will lead to unnecessary costs and delays in facilitating appropriate discharges. In doing so it will not provide for effective and efficient management of the network and will not meet the current and future needs of the community.
14. The Fuel Companies request the following amendment to the definition of Permitted Trade Waste at A.9.1 (deletions in strike through):

*Permitted Trade Waste means Trade Waste that meets the physical and chemical Characteristics as defined in Schedule A of the Administration Manual ~~without Pre-treatment~~ and has a discharge volume of less than 5 m<sup>3</sup> /day and a flow of less than 2 L/s.*

15. It is noted that this amendment would remove the distinction between Permitted and Controlled Trade Wastes, and this is addressed further below.

#### *Volumes*

16. Discharge volumes from car wash facilities operated by the Fuel Companies vary day-to-day, but typically fall between 3m<sup>3</sup> and 10m<sup>3</sup>. Instantaneous discharge rates are less than 2 litres per second. Consequently, it will be the maximum daily volume that will dictate whether the Fuel Companies' car wash discharges fall to be considered controlled or conditional as defined under the proposed bylaw, noting that discharges in excess of 5m<sup>3</sup>/d would fall to be conditional.
17. Where car wash discharges meet the Schedule A physical and chemical characteristics, excluding 24-hour flow volume, the Fuel Companies consider there should be a controlled trade waste pathway as volume is not determinative of risk, discharge quality is consistent, and costs associated with volume can be appropriately addressed via metering. Doing so will achieve the purpose of the proposed bylaw.
18. This could be achieved by removing the 5m<sup>3</sup> limit or increasing it to 10m<sup>3</sup>, at least for modern car wash facilities with management plans in place.



*Grease Traps, Oil and Grit Interceptors*

19. Section B.7.4 is titled “*Discharges via Grease Traps, Oil and Grit Interceptors*”. The clauses focus on grease traps management of discharges from food premises and the appropriateness of reference to Oil and Grit Interceptors is unclear in this context. Further, clause C essentially repeats which is stated at B.7.3. The Fuel Companies request references to Oil and Grit interceptors be removed from B.7.4 and that clause c of the same be deleted, with reliance placed on B.7.3.

Signed on and behalf of Z Energy Limited, BP Oil New Zealand Limited, and Mobil Oil New Zealand Limited



.....  
Ollie Doherty-Ramsay  
Planning and Policy Consultant

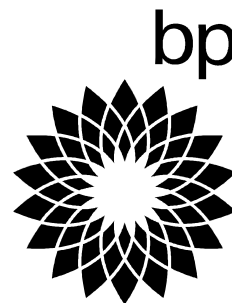
**25 May 2022**

**Encl: Annexure 1: BP Trade Waste Management Plan**

UNCONTROLLED HARD COPY - - VALID ONLY AT THE TIME OF PRINTING - - 16-May-22



NZ Plan



PLN-A-3.6.1-02

## NZ Trade Waste Management Plan (TWMP)

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Document Owner:	██████████
Approved By:	██████████
Prepared By:	██████████
Document Status:	Final
Version Number:	1
Approved Date:	16/05/2022
Next Review Due By:	15/05/2025

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To review changes, refer to the ['Version Summary'](#) at the end of this document.

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## 1. Purpose

This plan is designed to assist bp staff and suppliers in the management and maintenance of the wastewater discharges (trade waste discharges) on bp operated convenience retail service station sites, so that they comply with the provisions of council trade waste bylaws.

This plan describes the methods in which bp comply with their environmental obligations and the requirements of OMS 3.6 Environment:

**Principal:** *bp entities identify and systematically manage the impact of their activities on the environment and integrate environmental requirements into the local Operating Management System.*

**Group Essential 3.6.1:** *Systematically identify environmental hazards, assess risks and opportunities to minimise environmental impact and implement and maintain plant, process, people and performance risk reduction measures identified as necessary to manage the risks and use as an input to the entity risk register. Environmental risks include but are not limited to emissions to air, discharges to water and land and the handling and disposal of waste.*

## 2. Scope

This plan relates to the operation and management of trade waste discharges to council owned sewerage networks on bp convenience retail service stations in New Zealand. This plan has been prepared in accordance with the general requirements of trade waste bylaws.

The requirement specified in this plan applies equally to bp employees, and contractors engaged in the NZ Marketing, Supply & Logistics (MS&L) business.

This plan does not apply to service stations where wastewater is treated and discharged to land and water onsite. These sites are subject to the requirements of their discharge consents and site-specific wastewater management plans.

## 3. Terms, Definitions and Abbreviations

**Table 1: Terms, Definitions and Abbreviations**

**Adblue**

Diesel emission fluid or DEF is a water-based urea product used for reducing nitrous oxide emissions from diesel vehicles. Sold in packs from bp stores and dispensed in bulk from specific bp truck stops.

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<b>BraveGen</b>	bp's cloud-based compliance management system software that contains and tracks all consents issued to bp under the Resource Management Act 1991 and council trade waste and stormwater bylaws
<b>MSDS</b>	Material Safety Data Sheets contain comprehensive information about the properties of a hazardous substance, how it affects health and safety in the workplace, the environment, and how to manage these risks.
<b>Pretreatment device</b>	A device (grease trap or interceptor) designed to reduce contaminants being discharged to the receiving environment. For this document the receiving environment is the sewerage system and the wastewater treatment plant.
<b>Sewer/Sewerage</b>	The network of underground pipes that collect wastewater and convey it to a wastewater treatment plant.
<b>Trade waste bylaws</b>	Bylaws made under the Local Government Act 2002 that control connections to the sewer and the content of wastewater discharges. The controls are set to ensure the safe and compliant operation of the sewer pipes and the wastewater treatment plant.
<b>Wastewater / Trade waste</b>	Water that has been used at the site for cleaning, sanitation, or processes where the water is likely to contain elevated levels of contaminants that must be treated before being discharged to the environment.

## 4. Roles and Responsibilities

The roles and responsibilities in relation to trade waste are described in table 2 below and are described in bp procedure PRO-A-7.1-0-01 Environmental Compliance: Obtain and maintain license to operate.

**Table 2: Roles and Responsibilities**

<b>Environmental Manager</b>	Responsible for ensuring sites are compliant with all trade waste bylaws including sites that have and maintain trade waste permits. Works with councils, the Maintenance Manager and Area and Store Managers.
<b>Area Manager</b>	Responsible for ensuring specialist advice is sought, via the Environmental Manager, if controls are deemed not to be working, or if council inspections find that the site is not compliant with the requirements of the trade waste bylaws.

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<b>Maintenance Manager</b>	Responsible for determining frequency of scheduled maintenance and for ensuring the Specialist Maintenance Contractor is servicing and maintaining the site as per the requirements of the programmed maintenance schedule.
<b>Store Manager</b>	Responsible for ensuring the environmental requirements have been reviewed and tailored to meet the requirements of that store. The store manager is also responsible for ensuring the daily checks are being completed by the Store Safety Lead or an assigned peer.
<b>Store Safety Lead</b>	Responsible for ensuring that required checks outlined in the Store Safety Diary are undertaken and documented. If any issue arises the Store Manager must be notified.
<b>Specialist Maintenance Contractor</b>	bp has engaged ECL-SiteCare to monitor and manage scheduled maintenance, sediment and grease removal, disposal, and provide emergency response support.
<b>bp Staff</b>	Required to report all hazards to their Store Manager, arising in their workplace as soon as is reasonable to do so.
<b>Environmental Consultants</b>	BP has engaged AECOM and PDP to monitor chemical composition of trade waste discharges and report these results to council where this is required.

## 5. Methodology

### 5.1. Discharges to the trade waste system

bp operated retail service stations generate the following discharges to the trade waste system:

#### a. Toilets

Wastewater from the site toilets used by bp staff and customers drains directly to the sewer. There is no pre-treatment provided or required for this discharge.

#### b. Food preparation

Coffee & food preparation and oven and cabinet cleaning generate relatively low volumes of wastewater from the site kitchen sinks. Food preparation is limited to heating of pre-prepared and pre-packaged food. This wastewater may contain residual dairy and milk products, residual coffee grounds (bulk coffee grounds are recycled), food crumbs and residual cleaning products. Material Safety Data Sheets (MSDS) for all cleaning products used are included in Appendix F.

All sites have pre-treatment devices including sink strainers to prevent solids entering drains, and passive grease traps to remove solids, grease and oils. Only wastewater from the food preparation areas, kitchen sinks, and dishwashers are disposed of through the grease trap.

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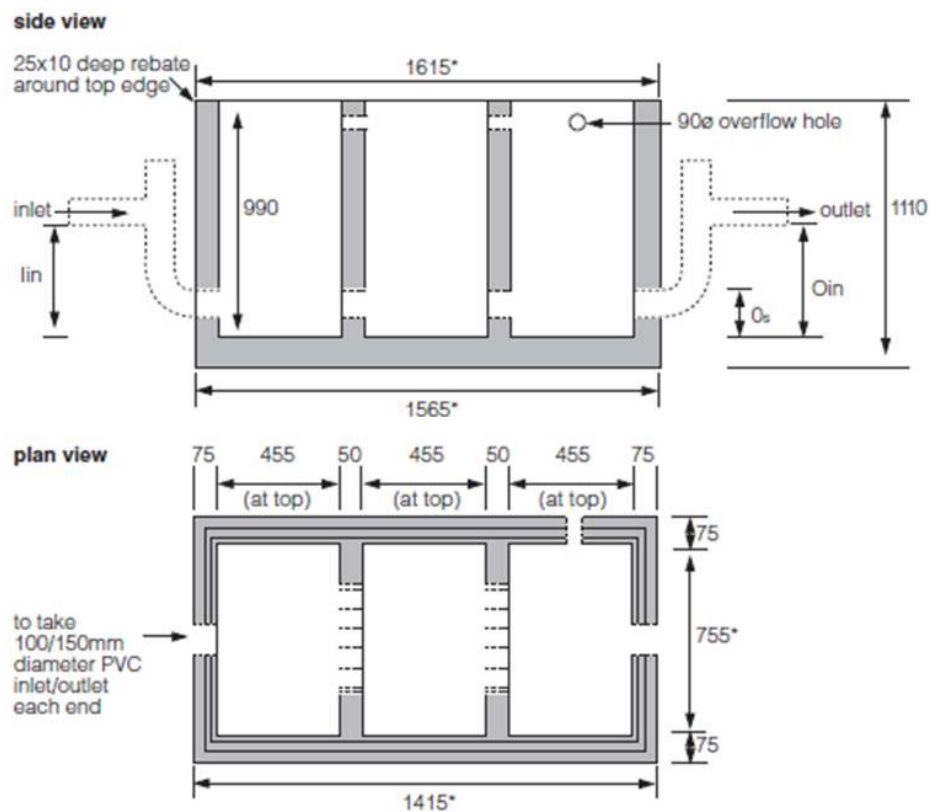
Sink screening (fine mesh with hole size no greater than 2mm) should be installed on all kitchen wash up sinks that discharge to the sewer. At least one layer of mesh must be non-removable.

**Photo 1 Example of a kitchen wash up sink screen**



The most common types of grease traps installed are the concrete rectangular 3 chamber 425 litre Humes 04601 (shown in Figure 1) and 445 litre Hynds GT0445. The specification sheets for both models are attached in Appendix E.

**Figure 1 Plan view of the Humes 04601**



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bp staff are also required to follow the following good housekeeping practices to reduce the volume of wastewater generated and to minimise the amount of food waste being washed into the grease trap:

- Empty/unblock screens in sink drains regularly and dispose of in the appropriate waste disposal bin.
- Ensure screens in sink drains are fitted properly and are working correctly, and not to remove screens from their drains unnecessarily.
- Scrape food waste off dishes and trays into an appropriate waste disposal bin before washing.
- Wipe oils from fat collection trays with a paper towel prior to washing.
- Use correct dispenser bottles for cleaning chemicals to reduce chemical usage.
- Only use dishwashers when there is a full load to wash.
- Do not dispose of chemicals, or liquid food waste (e.g. milk, sauces or oils) via drains or wash tubs.
- Do not leave taps running unattended and reduce water usage wherever possible.

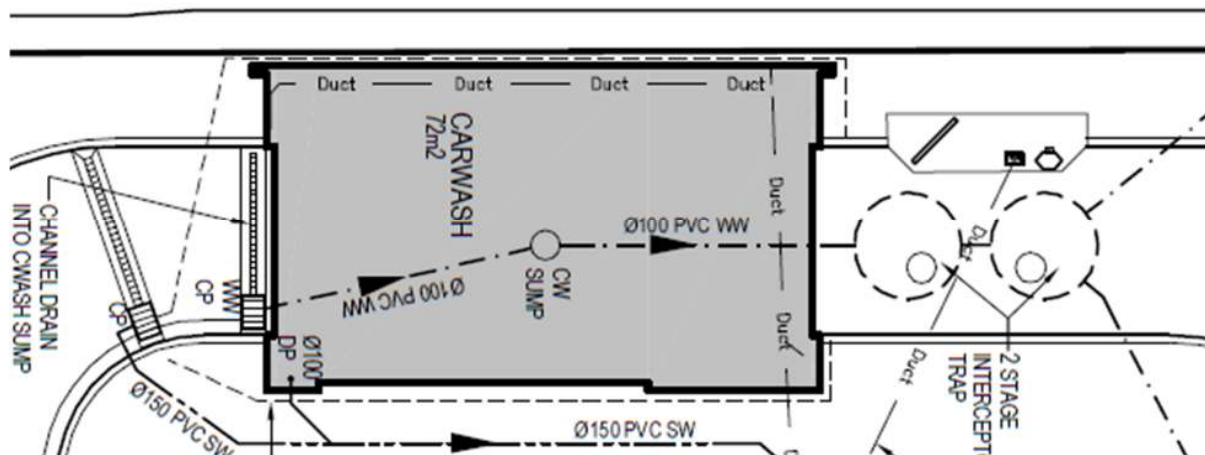
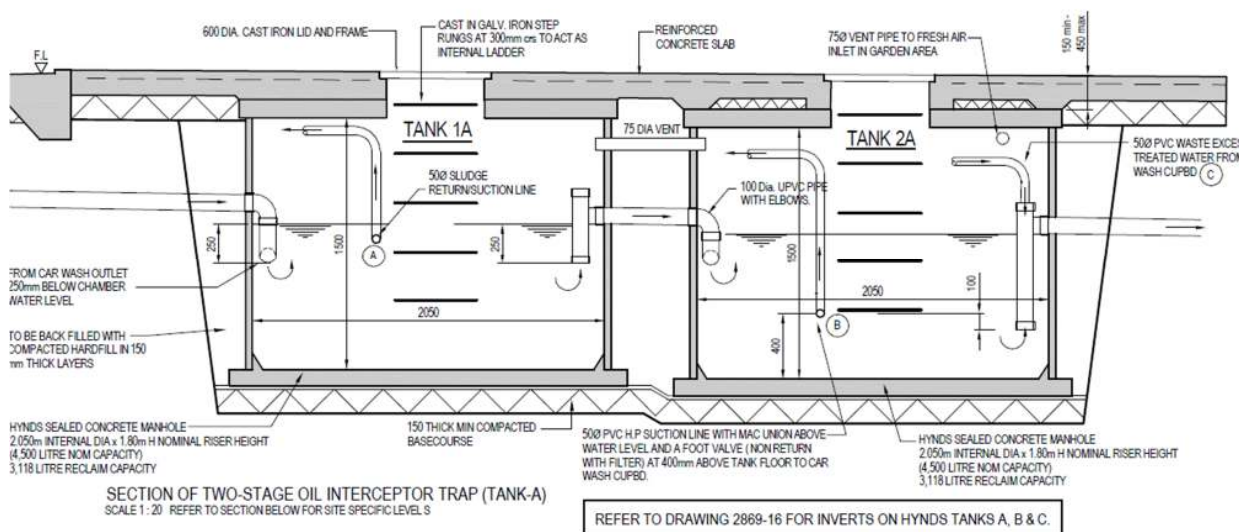
**c. Carwash – where installed**

Wastewater accumulated during a car wash cycle is captured in sumps within the carwash. Wastewater from the carwash contains sediment and oils off vehicles, and the residues from the soaps and waxes dispensed during the wash. MSDS for all carwash soaps and waxes are included in Appendix F. The amount of wastewater discharged to trade waste depends on the number and type of car wash cycles used on any given day and the capacity of the sites recycling system.

All sites with carwashes have pre-treatment devices. The sumps in the carwash floor provide initial settlement of coarse sediments. Wastewater is then directed to a two-stage oil and grit interceptor. This interceptor provides further settlement of solids and captures any floating hydrocarbons, waxes, or oils. The specification sheets for the carwash interceptors and recyclers used are attached in Appendix E. Figures 2 and 3 below show a typical carwash drainage and treatment configuration and oil and grit interceptor trap details.



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**Figure 2 Plan view of a typical car wash drainage configuration****Figure 3 Cross section of Hynds 2 stage oil and grit interceptor trap**

Prior to discharge to sewer from the interceptor, most of the wastewater is recycled for reuse within the carwash. The bp carwash network recycles typically 65%-90% of the water from a carwash cycle. For more than 10 years the entire bp Connect carwash network (currently 79 locations) has used this technology to limit the use of freshwater, saving an estimated 70 million litres of water annually.

Any remaining wastewater is discharged to trade waste. This discharge water is typically of a very high quality after treatment. 11 years of monitoring by bp over 39 sites shows that the quality of the water for key water quality parameters is very high and no exceedances of trade waste limits have been observed

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over this period. Table 3 provides a summary of this data for key water quality parameters. A full summary including additional parameters is attached in Appendix E.

**Table 3: bp carwash water quality sampling (TPH, pH, TSS) summary 2010-2022**

	TPH g/m3	pH	TSS g/m3
Compliance limits*	50	6.0-9.0	600
Average	9.20	6.97	38.46
Min	0.5	6.2	6.1
Max	48	8.0	83.0
Exceedances	0	0	0
# Sites	39	39	5
# Samples	163	157	37

**Notes:**

TPH = Total Petroleum Hydrocarbons

TSS = Total Suspended Solids

\* Compliance limits are based on Hamilton City Council trade waste consent thresholds

## 5.2. Maintenance, and cleaning of the pre-treatment devices

The maintenance of bp grease traps and car wash interceptors is managed and coordinated centrally by the bp maintenance team.

bp engages a Specialist Maintenance Contractor (SiteCare) to undertake scheduled maintenance, sediment and grease removal and disposal, and provide a rapid response service in the event of drainage system failures and spills. SiteCare maintain and monitor interceptors on the following basis:

- Grease traps – checked at least once every 3 months
- Carwash Interceptors – checked at least once every 3 months

Some sites grease traps and interceptors require more frequent servicing and can be serviced as frequently as monthly. The frequency of the cleanout is set by the bp maintenance team and is informed by observations by bp staff & SiteCare and by bp and council water quality monitoring.

Scheduled maintenance includes the measuring of sediment levels and oil and grease levels and removal of these wastes where required as follows:

- A carwash interceptor showing sediment levels of more than 150mm requires a “pump out” and appropriate disposal of liquid and sediment. The presence of oil and grease will also trigger a “pump out”.
- A grease trap is serviced by removing the entire contents of the trap including cleaning the walls and baffles in the grease trap and then refilling with cold water.

SiteCare service the traps and interceptor as per their process guides and complete a servicing verification form as a record and evidence of the service. The form includes photos of the work completed. Appendix D includes examples of the SiteCare checklists.

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Between scheduled services bp staff also complete daily site walk overs and these include "sight checking" the drainage including the grease traps sumps and interceptors. If there is excessive sediment build up, overflows or significant oil and grease observed they will request a reactive service by the bp maintenance contractors.

**Table 5: Maintenance Schedule**

Area	Task	Responsibility
Grease trap	<b>Three Monthly (at least):</b> Check and clean grease trap	bp Maintenance Contractor
	<b>Daily</b> Site walk over and drainage check	bp staff
	Good housekeeping practices	bp staff
Carwash Interceptor	<b>Three Monthly (at least):</b> Check and clean car wash sumps and interceptor	bp Maintenance Contractor
	<b>Daily</b> Site walk over and drainage check	bp staff

### 5.3. Monitoring and reporting

At some sites the trade waste consents require bp to collect and analyse trade waste samples. Where this is a requirement the Environmental Manager arranges for the Environmental Consultants to arrange sampling, analysis and reporting in accordance with the requirements of the consent.

If an exceedance of the trade waste consent criteria is reported by the lab this result will be notified to the relevant council by the Environmental Manager as soon as practicable after receiving the report. The Environmental Manager will also advise the council of the actions bp will implement to improve the discharge. The actions will generally involve an additional maintenance visit by SiteCare to clean the device and then resampling by the Environmental Consultant to confirm the discharge meets the trade waste criteria.

### 5.4. Solid and liquid waste disposal

The disposal of sediment and liquids removed from pre-treatment devices is guided by the following principles:

*All solid and liquid waste generated shall be:*

- *assumed to be contaminated.*
- *characterised, tracked and disposed of at a facility that is authorised to receive it.*

SiteCare undertakes the removal, transport, and disposal of liquid and solid waste from the grease traps and car wash interceptors. SiteCare's disposal and waste tracking system ensures that the removed

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waste is treated and disposed of at an authorised facility and its movement is recorded and tracked. These records are available to be reported to Council if required.

### 5.5. Fuels Spill Management

Should a surface fuel or Adblue spillage occur on a site, the immediate steps are listed in the site 'Retail Emergency Flipchart' under spills.

- **For major product spills over 20 litres:** bp staff follow the emergency procedures outlined in the flipchart while continuing to monitor their own personal safety.
- **For minor spills under 20 litres:** bp staff layer spill-absorbent material on the spill immediately. Once saturated, the spill material can be shovelled into a container marked for disposal of waste oil products.

If the spill is not contained within the sumps or interceptor and makes it into the sewer or stormwater drains, bp Staff must notify the local council of the incident as soon as reasonably practical via the council pollution hotline (the relevant hotline details are provided in each sites Emergency Flipchart). Any spill incidents shall be recorded in IRIS, bp's incident notification system.

### 5.6. Permitting

The discharge of wastewater to council sewer is controlled by district & city council trade waste bylaws made under the Local Government Act 1981. While all these bylaws are based on a similar standard template there are significant differences in the discharge criteria and how they are issued and monitored.

Most bylaws include a set of permitted and prohibited discharge criteria (quality and quantity). Sites that meet the permitted criteria do not need a permit. Sites that exceed the permitted criteria are deemed a conditional activity and require a permit. Conditional permits are subject to specific terms and conditions including:

- providing and maintaining pre-treatment devices
- discharge quality monitoring and reporting. In some districts the councils monitor the discharge and in others bp is responsible for monitoring.

Permits (where required) are obtained by the project manager at the same time the site is connected to the sewer network and are typically required to be renewed around every 2 years. In some districts renewals happen automatically. Renewal applications are arranged by the Environmental Manager. All permits held by bp are recorded and compliance tracked in the bp compliance management system (BraveGen).

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## 6. Verification

The key process steps outlined in this plan are included in a Self-Verification Programme.

## 7. Associated Documents

The following associated documents should be considered in understanding and applying the instructions provided in this plan.

**Table 6: Required References**

Document Name	Document No	Document Location
Retail Emergency Flipchart	BPI1910-BP	Controlled Document Library
Environmental Compliance: Obtain and maintain license to operate	PRO-A-7.1-0-01	Controlled Document Library
As-Built Site Plans (Drainage)	Standard Design Plan	Spencer and Holmes / On-Site

## 8. External References

This plan was prepared with reference to relevant legislation/regulations including but not limited to, relevant Acts, Regulations, Standards and industry Codes and Practices.

Details of current legislation/regulations can be provided by the Assets Team on request.

## 9. Version Summary

The table below provides a summary of version history of this plan.

**Table 7: Document Version Summary**

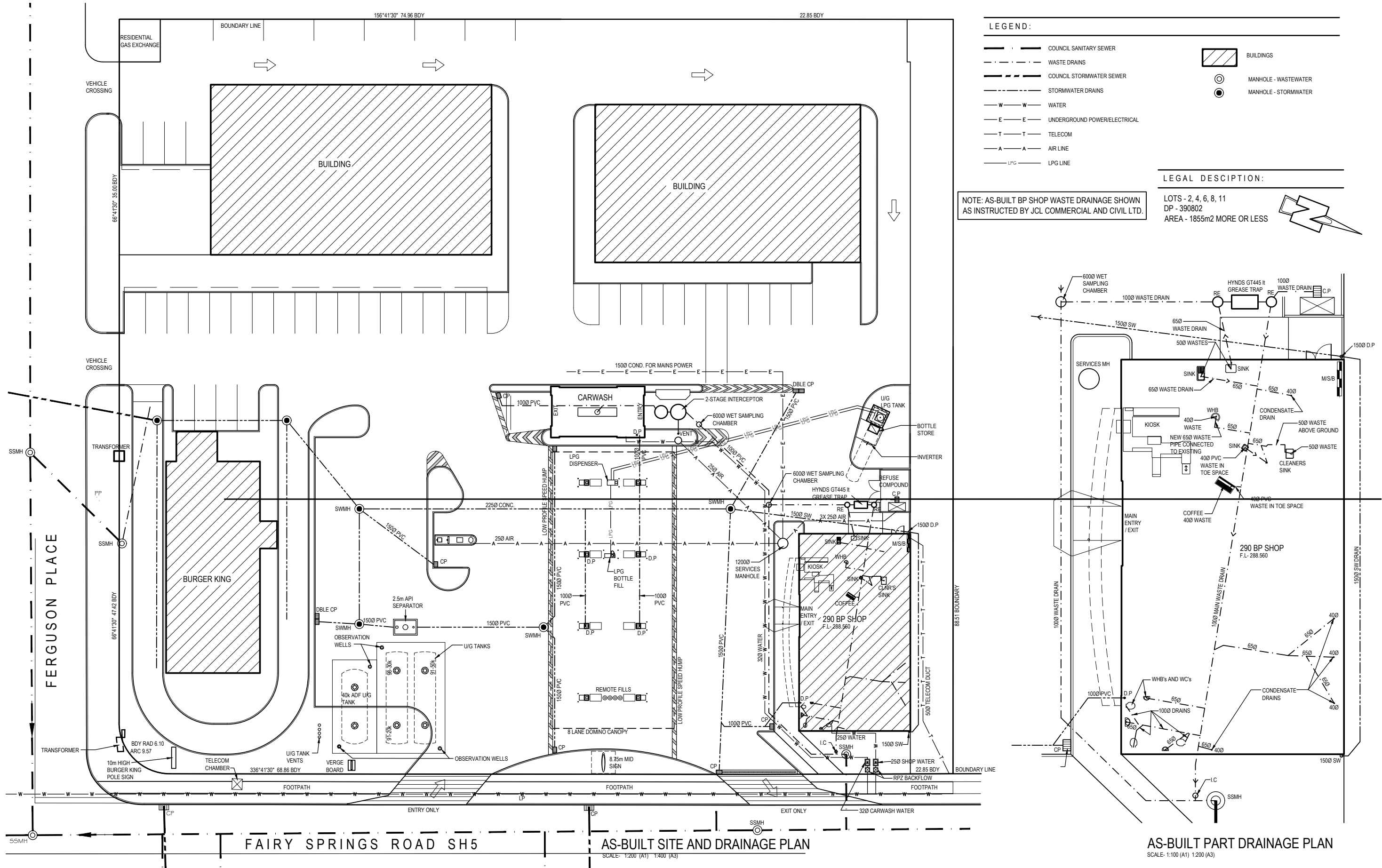
Version	Prepared by	Description of Change	Date	MoC
1		First draft of document	13/05/2022	


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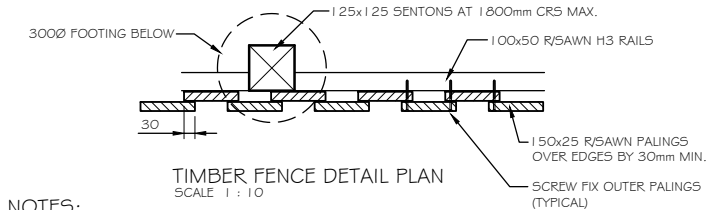
## **Appendix A - Generic drainage plan for a bp connect site**



<div></div> <div>TECHNITRADES ARCHITECTURE ECCL 4.12    FORM FAITH FUNCTION</div>	12 BEN LOMOND CRESCENT, PAKURANGA, AUCKLAND. PHONE & FAX (09) 576 7166 design@technitrades.co.nz					A1 Scale.	1:200	<div>NOTES:</div> <div>DO NOT SCALE. DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE.</div> <div>IF IN DOUBT ON ANY ISSUE SEEK VERIFICATION PRIOR TO PROCEEDING. READ THESE DRAWINGS IN CONJUNCTION WITH ALL OTHER CONSULTANTS DRAWINGS AND SPECIFICATIONS.</div>	<div>©</div> <div>THIS DOCUMENT IS CONFIDENTIAL. COPYRIGHT IS VESTED IN BP OIL NZ LTD WRITTEN CONSENT IS REQUIRED PRIOR TO REPRODUCTION OF ANY KIND. COPYRIGHT © - BP OIL NZ LTD 1989</div>	Project Title.			
		D	SECOND AS-BUILT ISSUE	BKM	17-12-12	A3 Scale.	1:400			<div>BP FAIRY SPRINGS REFURBISHMENT 80 Fairy Springs Road, Rotorua</div>			
		C	AS-BUILT ISSUE	BKM	17-04-12	Designed.	M.T.KEOGH						
		B	CHANGES MADE AS PER COUNCIL LETTER DATED 21 FEB 2012	BKM	24-01-12	Drawn.	B.K.MILLWARD						
		A	BUILDING CONSENT ISSUE	BKM	20-01-12	A1 Plot Scale.	1:1						
		REVISION	DESCRIPTION	BY	DATE	A3 Plot Scale.	1:2						
Client Reference No. 3FAI2-19-D										Drawing Title. As-Built Site and Drainage Plan	1 OF 3	2675-1	Rev. D

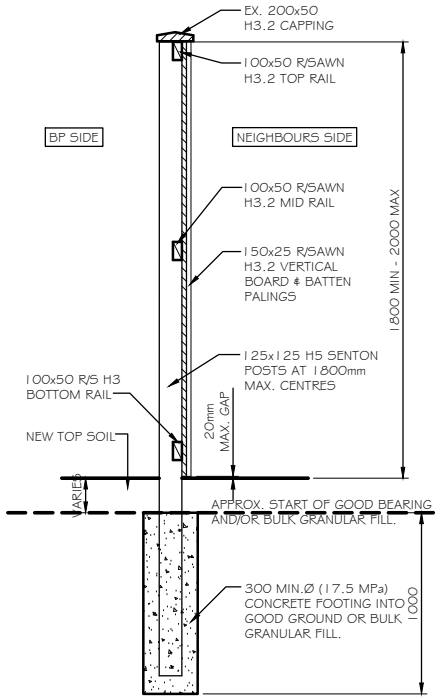







**NOTES:**

- REFER TO DRG 2425-1 FOR EXTENT OF FENCE AND LOCATION
- TOP OF FENCE TO BE LEVEL AND STEPPED TO ENSURE 2000(MAX) TO 1800 HEIGHT (MIN) DEPENDANT ON ADJACENT GROUND LEVELS
- EARTH MOUNDING TO TAKE PLACE PRIOR TO FENCE CONSTRUCTION.
- NOTE THAT THIS PROPOSED FENCE IS AN ACOUSTIC SCREEN FENCE - GAPS BETWEEN TIMBER PALINGS, ETC... ARE UNACCEPTABLE.
- ALLOW TO STAIN FINISH BOTH SIDES OF FENCE WITH WATLYL TRADITIONAL OIL STAIN - BIRCH GREY.



TYPICAL ACOUSTIC TIMBER FENCE DETAIL  
SCALE 1 : 20

Drawing Title: <b>BP FAIRY SPRINGS</b> 72 Fairy Springs Road, Rotorua	
Drawing Title: <b>PROPOSED SERVICE STATION DEVELOPMENT</b> <b>Carwash Services Plan</b>	
BP Oil Reference No. <b>3FAI2-15-C</b> Drawing prepared on behalf of: <b>BP OIL</b> MARKETING ENGINEERING	
Technidraws Drawing No.: 6.016.3 <b>2425-6</b>	Rev No.: <b>C</b>



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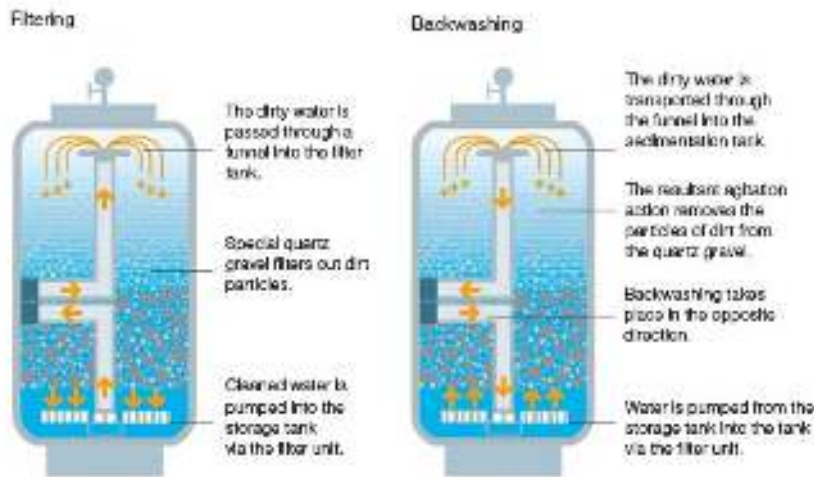
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## **Appendix B - Grease trap specification sheets**

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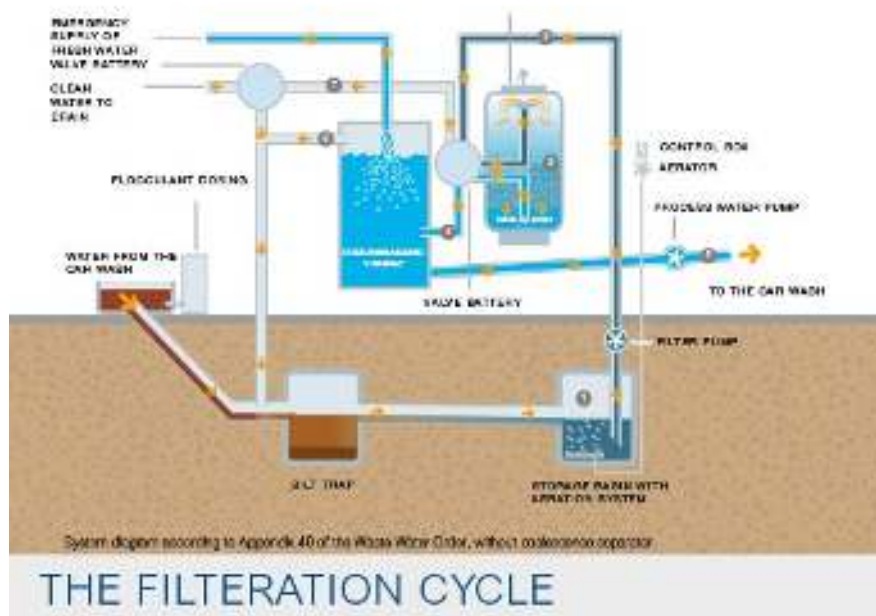
## **Appendix C - Carwash interceptor & water recycler specifications**



## HOW AQUAPUR® WORKS

AquaPur – simple, economical.

- The water flows through the filter from top to bottom. All dirt particles are retained there in the quartz gravel.
- The filtered water flows immediately into the storage tank.
- The system cleans itself through the reverse flow process. Water is pumped through the filter from the bottom to the top. Return flow water and the initial filtrate are passed into the sedimentation tank for sedimentation.



## THE FILTRATION CYCLE

- After the silt trap, the waste water flows into a storage tank with aeration system which reliably prevents odours.
- The precleaned water is pumped into the filter.
- In the filter operation, the water flows through one fine and one coarse gravel layer.
- The cleaned water flows into the process water tank.
- From the storage tank, the water is pumped into the car wash.
- Water that is not required for use is returned to the circulation pipes.
- Excess water is disposed of by discharging it into the drains.

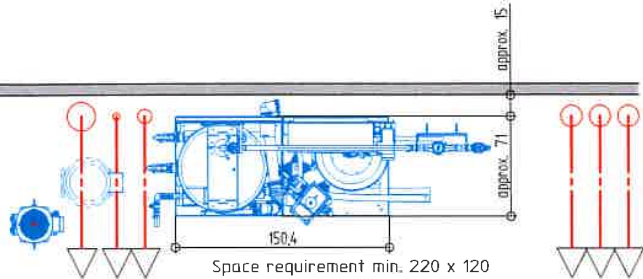
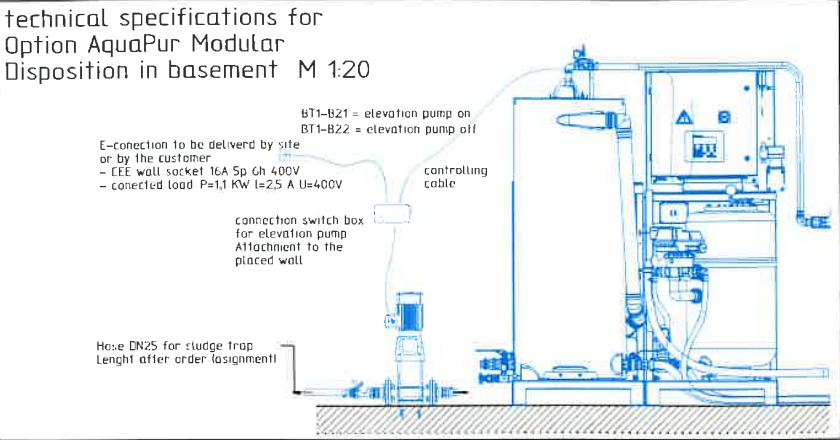




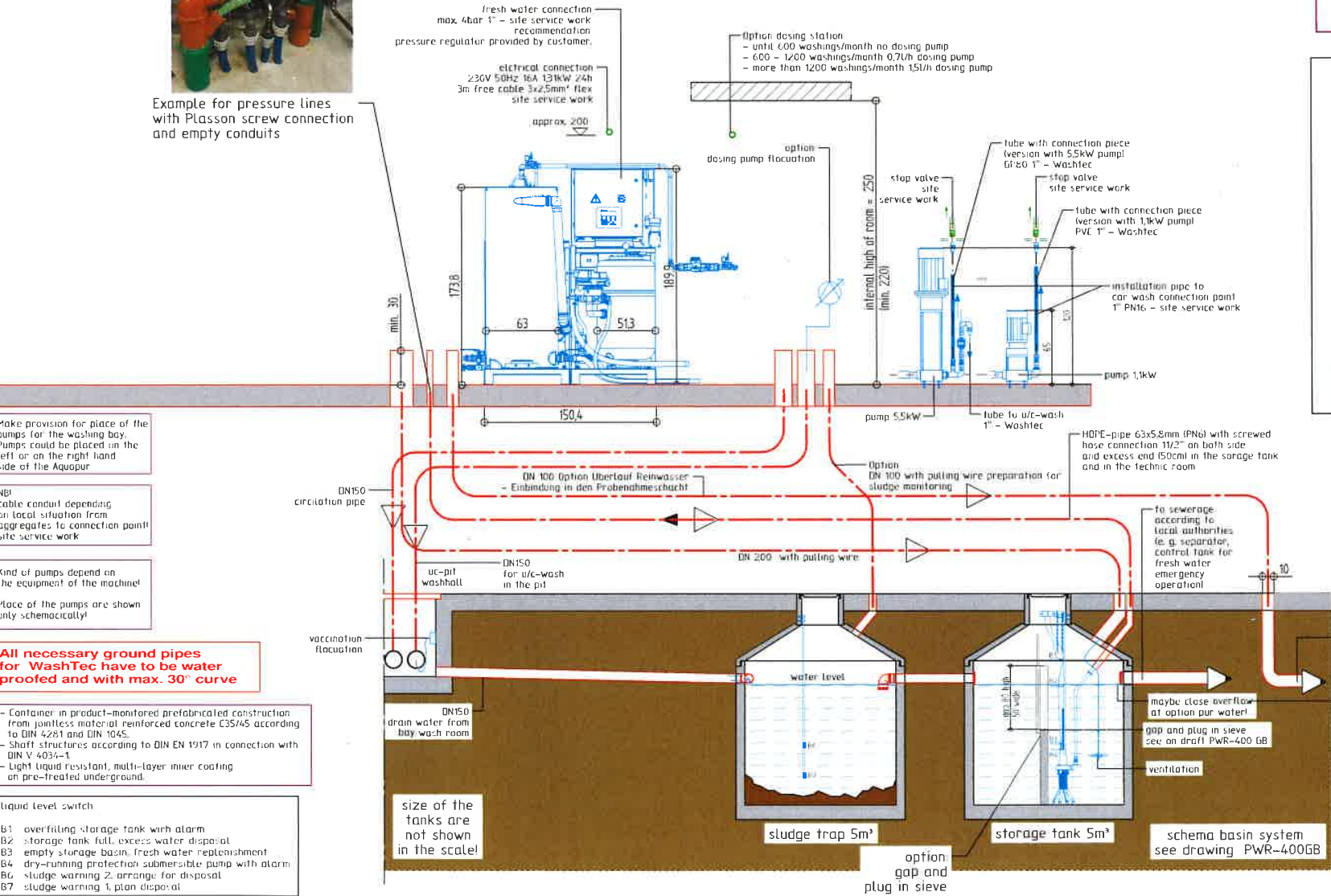
AquaPur Modular 3m³/h

Main application for:  
– Roll Over

technical specifications for  
Option AquaPur Modular  
Disposition in basement M 1:20



Example for pressure lines with Plasson screw connection and empty conduits



technical specifications

In accordance with local regulations, a pulse current sensitive RCD (Fi circuit breaker) Type A with  $I_{\Delta n} \leq 30\text{mA}$  is recommended. Connection is only allowed to mains with earthed neutral conductor!

output (power) with build Zertif. Z-833-24 without build Zertif.	max. 3m³/h max. 3m³/h
measurements (LxWxH), maximal without reclaimed pump	1800x950x2020mm
required space (LxWxH) without reclaimed pump	2000x1200x2500mm
transport weight	250kg+375kg extra item
working weight	900kg inkl. quarz gravel filling and 400l storage tank
E-connection	power supply: 230V/N/PE, 16A gL/gS or C-characteristik
E-connection, 50Hz	P=131kW I=7,3A
E-connection, 60Hz	P=151kW I=10,8A
control system	microprozessor control
pressure increase pump	max. 3 pumps, achievement control system from the wash bay
storage tank	approx. 400l useful volume
fresh water connection	min. 2bar yield pressure max. 6bar yield pressure (max. 4bar static pressure) by 1", look up with ball valve, with 1" inside thread ending
gravel filling (leach filter)	quarz gravel 1-2mm 50kg (2 x 25kg sack) quarz gravel 0.4-0.8mm 200kg (7.5 x 25kg sack)

Services to be provided by site respectively by customer:

- technic room frost-free
- ground pipes/ embedded pipes frost-free
- pipes from pumps to machine
- pipe HDPE-pipe (PN6) from storage tank to AquaPur Modular
- ground pipe overflow to sewerage
- ground pipe circulation pipe
- ground pipe to u/c-wash
- option: cable pipe with pulling wire - preparation for sludge monitoring
- cable pipe with pulling wire
- electrical connections: 230V/50Hz 16Aca 13kW24h
- 3m free cable 3x2.5mm² flex
- fresh water connection 1" max. 6 bar

All ground pipes to relocate waterproof!

Attention!  
In the separator system (tanks system) of AquaPur Modular without qualification approval, may not exceed a rain flow area of 30 m².

Attention!  
In the separator system (tanks system) of AquaPur Modular with qualification approval, may (without overflow and Annex 49) a rain flow area max. of 22.5 m². On account of rain water entry must be executed an overflow in the storage tanks.

Attention!  
Max allowed surface for discharge of wastewater of pre-wash area ist 30-40 m². Supply line from other areas/service station, workshop, washing material is not allowed!

Attention  
Without overflow in the storage tank, it isn't possible to wash only with fresh water!

blue = scope of delivery of Washtec  
gray = scope of delivery of Washtec (as an option)  
red = to be delivered by site or by the customer  
green = to be delivered by site or by the customer

For seal empty pipes from equipment room to the basin, you can use Bayma-Seal. This can be introduced by customer, as well as a spare part by Washtec service

Please note!  
All underground lines to be laid down as required by the local authorities.

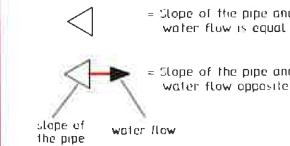
Keep connecting pipes between equipment room and storage tank as short as possible!

NB!  
Grounded pipes are only shown schematically! Keep connecting pipes between equipment room and storage tank as short as possible! All underground lines to be laid down as required by the local authorities.

All necessary ground pipes for Washtec have to be water proofed and with max. 30° curve

All ground pipes with 1 - 2‰ slope

Additional for standing in the cellar circulation / waste-water-lift-system 10m³/h with alarm of overflow, separat fuse, Order with option "standing in the cellar" with potential-free kontakt!



NB!  
DIN A4-pressure is NOT scaled!  
Original plan is DIN A1!

Evidence: measurements in cm!

Installations drawing, see also:

3026977	- Montage overview
3012213	- Flowdiagram
270122	- in disposition in basement
272344	- Installationsdrawing in disposition in basement

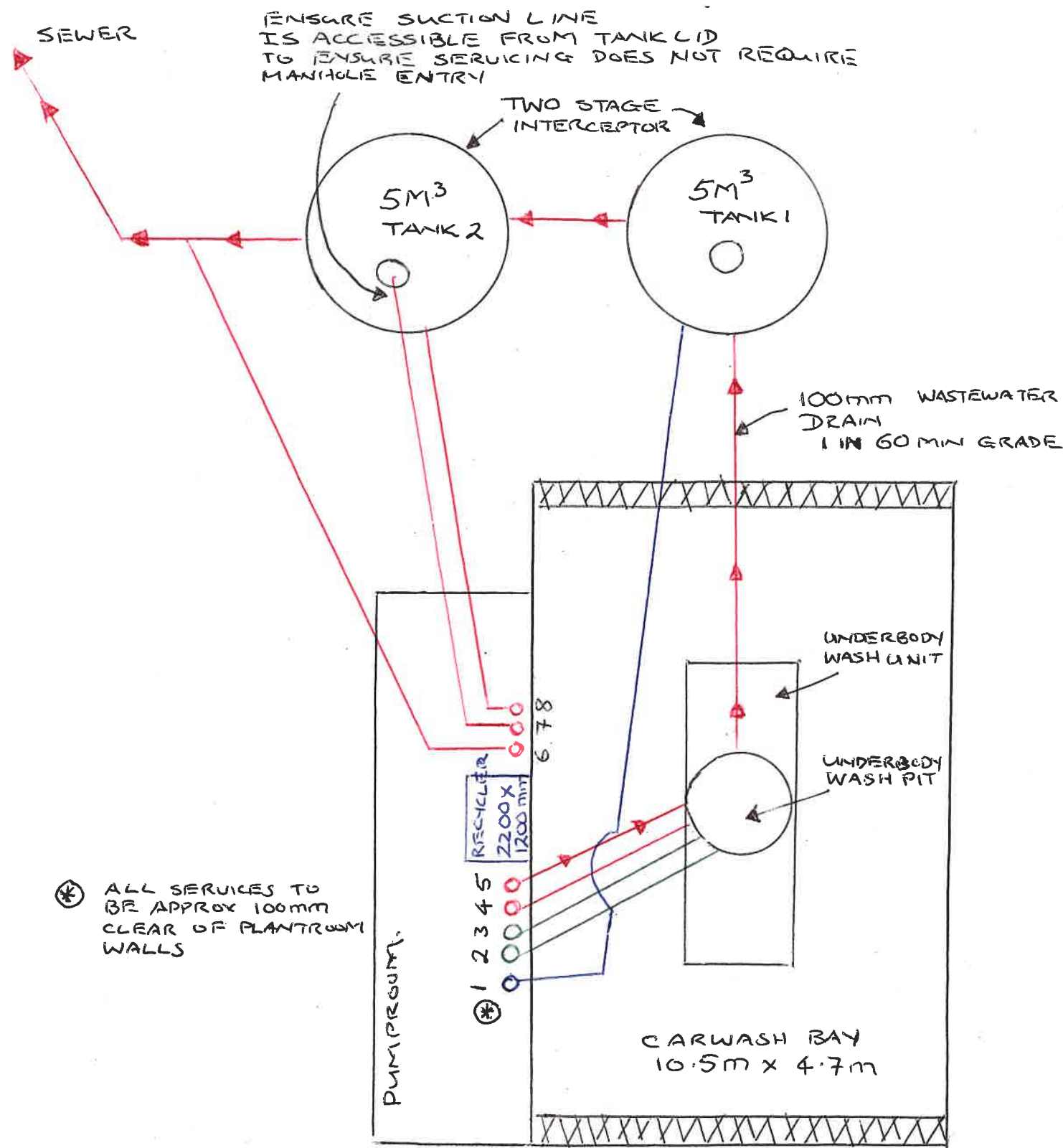
Attention!

When rainwater entry into the system must exist an overflow in the store basin in the drain system !!! Rainwater is only conditionally recommended. Please consult Washtec!

Hinweis!		This drawing is only made for planning support purposes. The construction must be done according to the drawings of the local site management!	
		Standardzeichnungen Wasseraufbereitung	
reclaimed water recycling system		AquaPur Modular 3m³/h	
Project		APM-203GB	
Drawing		PWR	
Revision		2444614	







KEY	LINE SIZE & MATERIAL	DESCRIPTION	DESTINATION FROM PLANTROOM
1	Ø100mm uPVC CONDUIT	FOR SLUDGE MONITORING	CARWASH RECYCLE TANK 1
2	Ø25mm COPPER PIPE HP Line	For underbody wash high pressure water	UNDER BODY WASH PIT
3	Ø32mm uPVC CONDUIT	UNDER BODY WASH HIGH CONTROL LINE	UNDER BODY WASH PIT
4	Ø100mm uPVC HIGH PRESSURE LINE	FLOC DOSING LINE	UNDER BODY WASH PIT
5	Ø150mm uPVC LINE	CIRCULATION PIPE	UNDER BODY WASH PIT
6	Ø50mm uPVC DRAIN - PN12 MIN	EXCESS TREATED WATER (CONSTANT FALL TO WW DRAIN)	WW DRAIN, EXIT SIDE OF RECYCLE TANK 2
7	Ø50mm uPVC HIGH PRESSURE LINE	SUCTION LINE	CARWASH RECYCLE TANK 2
8	Ø200mm uPVC conduit	AERATOR & LEVEL SWITCHES	CARWASH RECYCLE TANK 2



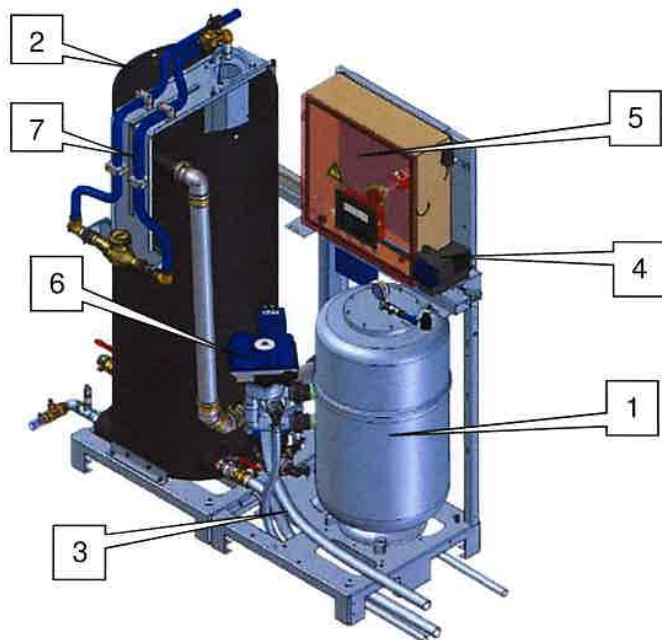
## Technical description AquaPur Modular

### Construction

The AquaPur Modular enables chemical-free water treatment for automatic vehicle washing. Depending on the version, the entire system consists of one or two settling tanks, a storage tank and the AquaPur Modular water treatment system.

The AquaPur Modular water treatment system consists of the filter tank, a water reclaim storage tank, associated PVC and hose lines, fresh water inlet, 6-way valve and a control cabinet.

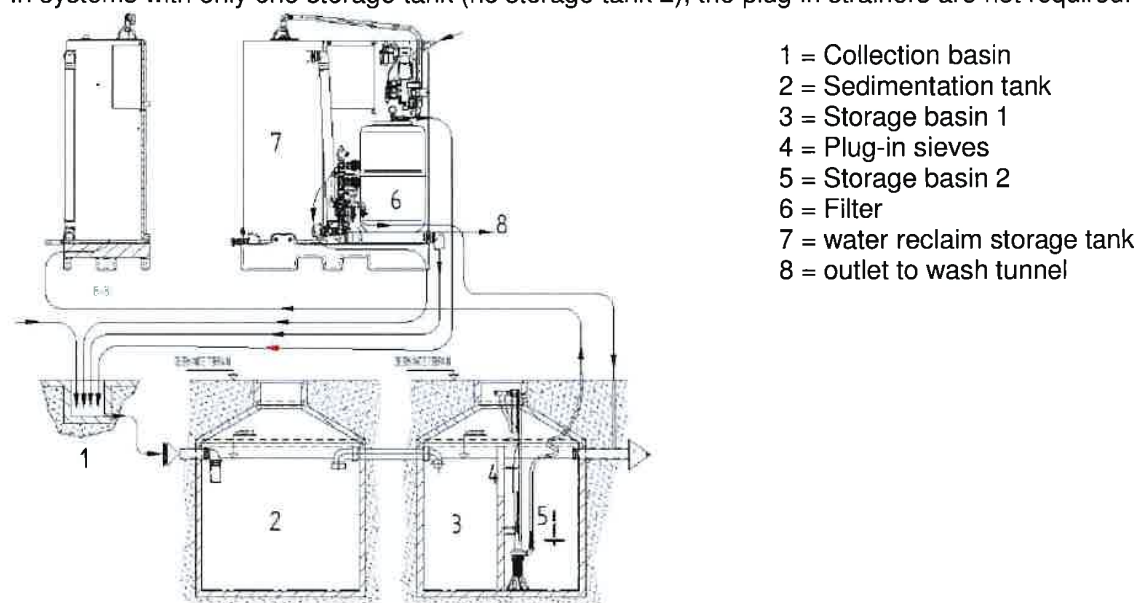
- 1 = Filter
- 2 = water reclaim - storage container
- 3 = PVC-/Hose lines
- 4 = Dosing Pump (Option)
- 5 = Control cabinet
- 6 = 6-way valve
- 7 = Fresh water inlet



### Process description

The reclaim water from the wash tunnel is collected in the collection basin of the washing plant and flows from there into the settling basin. The coarse dirt particles settle at the bottom of the sedimentation tank. The pre-cleaned water flows into the storage basin 1 where further dirt particles settle. The water then flows through the plug-in strainers into the storage basin 2. The plug-in strainers retain suspended particles such as brush abrasion, leaves, etc. and protect the submersible pump and downstream units from coarse dirt.

In systems with only one storage tank (no storage tank 2), the plug-in strainers are not required.



- 1 = Collection basin
- 2 = Sedimentation tank
- 3 = Storage basin 1
- 4 = Plug-in sieves
- 5 = Storage basin 2
- 6 = Filter
- 7 = water reclaim storage tank
- 8 = outlet to wash tunnel

A submersible pump conveys the pre-cleaned water from the storage tank to the filter system and pushes it through the filter from top to bottom. Existing suspended particles are filtered off and the cleaned water is stored in the water reclaim storage tank. It is thus available again as washing water.

The system cleans the reclaim water to such an extent that a water quality suitable for vehicle washing is achieved.

The filters are automatically backwashed after a pre-programmed time.

Depending on the process, the chemical drying aid and wax are applied with fresh water in the car wash system. This quantity of fresh water compensates for any discharge and evaporation losses. Any excess water is fed into the sewer via the separator system or directly from the filters (option: excess water discharge).

Too much salt in the service water (measured by the "conductivity value") can lead to a deterioration of the drying result. Experience has shown that the conductivity value of the service water should not exceed approx. 2 mS/cm. A preset quantity of fresh water can be fed manually into the system via the control system in order to reduce the salt content again. The fresh water supply can optionally also be controlled fully automatically via a conductivity control.

In order to avoid anaerobic conditions and the associated odour problems caused by digester gases, the water in the storage tank must be enriched with atmospheric oxygen. The aeration takes place in adjustable time intervals directly in the basin by a plate aerator. The disc aerator is supplied with air by a linear compressor.

### **Technology**

Applicable regulations and standards:

- Directive 2006/42/EC - Machinery Directive
- DIN EN 60204-1:2007 Safety of machinery - Electrical equipment of machines
- DIN EN 61439-1: 2012 Low-voltage switchgear and controlgear combinations
- DIN EN ISO 12100:2011 Safety of machinery; general principles for design; risk assessment and risk reduction
- DIN EN 1717:2011 Protection of drinking water against pollution in drinking water installations and general requirements for safety devices for the prevention of drinking water pollution by backflow.

Relevant DIN standards have been taken into account if no specifications are specified in the applied standards.

The requirements of the VDE 0100 series have been taken into account if no requirements are regulated in the applied standards.

The AquaPur Modular corresponds to the current state of the art.

The quality management of WashTec Cleaning Technology GmbH is certified according to EN ISO 9001.

The environmental management system of WashTec Cleaning Technology GmbH is certified according to EN ISO 14001.

The energy management of WashTec Cleaning Technology GmbH is certified according to EN ISO 50001.

## WATER RECYCLING OVERVIEW

The SpinClear Water Recycling unit is designed to simply and economically clean car wash water so that it can be used again for washing vehicles. It removes light insoluble particles such as oils, fats and waxes as well as removing some of the more heavy insoluble particles such as sand and silt. It can also help to minimize the bacterial action in the pits and reduce the smell of the water.

Some of the features of the SpinClear Water Recycling system are:

- Powerful Separation: Removal of all wax, oils and solids for clean wash water
- Quality Water Cleaning & Treatment: Strong Oxygenation controls the bacteria level in the treated water with no smell or odours
- Leading Edge Technology
- Lower Establishment Costs: The system requires considerably smaller pits than other systems resulting in lower installation & pit pumping costs
- Lower Operating Costs: The absence of chemicals and the reduction in operator interaction will reduce operating costs
- Low Maintenance: No chemicals used and only one coarse filter to clean.

A SpinClear Water Recycling unit will produce water of acceptable quality to wash a car from the “black water” collected from the wash bay pit, under the UnderBody Wash, and stored in either of the two underground tanks/Sumps. These tanks are typically around 1,500 to 3,000 litres each.

The Spin Clear Water Recycling unit is set up to provide recycled water to a header tank, in the pump room, that is then available to supply the carwash. This is a continuous process where the black water from the wash is drained into the car wash interceptor tanks underground. The first tank acts as a settling tank for the heavier solids. Water is siphoned off the top of this tank, to leave the solids behind, to another tank underground. The recycler unit takes the water from this tank, passes it through a coarse filter, then two centrifuges, like a Dyson vacuum cleaner, and finally through a foaming/aeration tank and stores it in a 700 litre tank above ground (Reuse Tank).

The sludge/solids or any other waste contaminants captured in the settling tanks are removed by a qualified maintenance contractor (for example, SiteCare). The contractor would typically attend the site with a vacuum tanker on a quarterly basis, depending upon wash volume. Following inspection of the central cess-pit, ACO drainage and reclaim, waste is then vacuumed from the chambers directly into their vacuum tanker. The extracted waste is then transported for disposal.

The coarse filter is used to protect the mono pump from damage and the two centrifuges are mounted back to back allowing the first one to remove the light oils and detergents and the second the coarse silt and sand. Then the water is aerated and any foam sent to sewer with the other wastes. The “cleaned” water is passed into the above ground tank (Reuse Tank). This water is used as the source of recycled water for the carwash. The recycler runs for six - ten minutes every time the wash process is started, and any excess recycled water pumped into the above ground tank is returned to the second underground tank, so that this water eventually becomes cleaner. The excessive waste streams from the SpinClear centrifuges are sent to the sewer or back to the first underground settling tank.

The recycler also runs every hour for six to ten minutes to continually keep the cleaning the dirty water. The levels in the reuse tank are monitored by the carwash, and if they fall below a set level the wash will shut down until the problem is rectified or the recycled water level fills the tank.

It is the water manifold on the WashTec SoftCare PRO/EVO which determines the percentage of recycled water used in the car washing process. This manifold is physically split into two sections by a block between segment 3 and 4. This means that the recycled water is fed into manifolds segments 1, 2 and 3 and the fresh water is fed into segments 4, 5, 6 and 7.

Segments 1-3 are used to feed the high volume sections of the carwash i.e. the brush wetting, pre rinsing and wheel wash. The Under Body wash (UBW) and the Side High Pressure (SHP) are fed directly from the recycle water pump and don't go through the manifold. Thus segments 1-3 and the SHP and UBW account for the 182 litres of the 209.5 litre total wash water

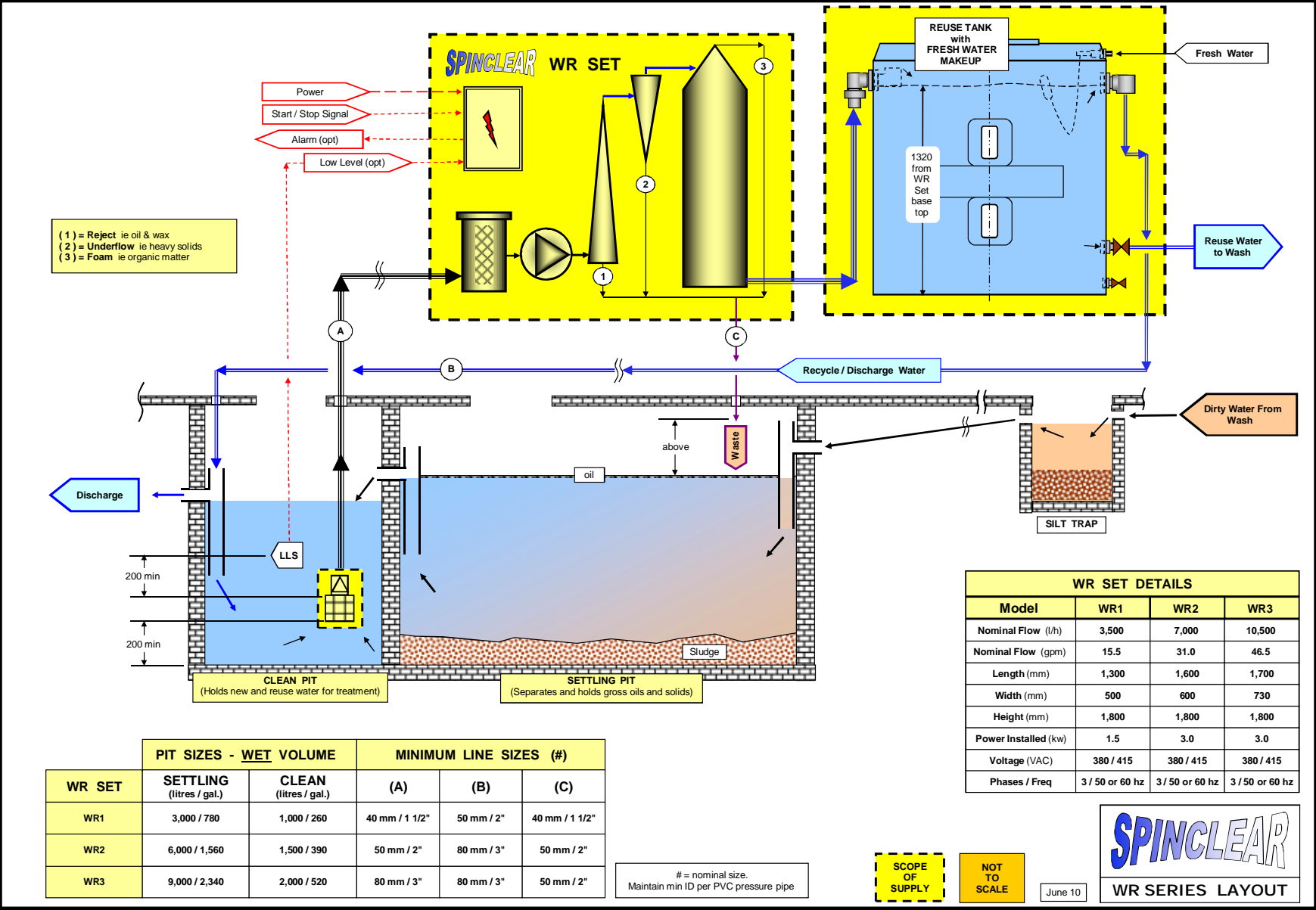
While the segments 4-7 are used for the lower volume foamed chemicals for example Wash Foam, Foam Wax and the Chemical Prewash. This accounts for 21.5 litres of the 209.5 litres in total. This is set in the factory, in Germany, before shipping and even though it is possible to remove this block it isn't something the site could do. It would take a factory trained technician to dismantle the manifold and then remove the block and reassemble.





A diagram has been attached so that you can see the overall process and layout of the Spin-Clear Water Recycling System.





# Hynds Oil and Grit Interceptor System

(Oil & Water Management)

Technical Guide SW 6

Hynds Oil and Grit Interceptors offer a simple and effective solution to separate and retain oil and grits from lightly contaminated washwater or stormwater prior to discharging to downstream pipe networks.



**Applications**

- Garages
- Driveways
- Paved parking areas
- Trap prior to a retention pond
- Heavy duty application

**Product Attributes**

- Manufactured from high strength steel reinforced concrete
- Robust and easy to maintain
- Watertight seal between precast concrete lid and tank walls
- Multiple chambers for greater efficiency

**Approvals/Standards**

- NZS 3109, Concrete Construction

**Quality**

- ISO 9001:2008 Quality Management

We are the supply partner of choice for New Zealand's stormwater management and treatment solutions.



Hynds oil and grit interceptors are a sought after solution used for the separation of oil and grits from stormwater runoffs from areas such as light commercial areas, garages, truck stops, paved parking areas and service stations.

#### Unit options available

##### 1. Heavy duty oil and grit interceptor ( Refer Figure 1 )

- The Heavy Duty oil and grit interceptor is a twin chambered unit made out of two flange based manholes and offers a premium level of treatment
- 3000L and 4500L units are available for use
- It can be designed for multiple loading requirements (Please contact the stormwater team at Hynds )
- The standard loading for a HD oil and grit interceptor is HD60 but it can be designed for HN-HO-72
- The HD oil and grit interceptors have 150mm diameter internal pvc fittings
- These units can be provided with risers in order to satisfy the lid level requirement at your site with ease.

##### 2. Light duty oil and grit interceptor ( Refer Figure 2 )

- The Light Duty oil and grit interceptors are rectangular in shape and offer a basic level of treatment.
- They are fabricated in inverted precision steel moulds that produce a high quality finish.
- 3000 L and 3300L units are available, with 100 or 150mm diameter earthenware fittings
- Standard 150mm thick precast concrete lids are suitable for light traffic. Thicker lids for heavier application are available on request
- The standard loading for a LD oil and grit interceptor is LD20

- The heavy duty oil and grit interceptor units include Ø150mm internal pvc fittings and pvc starter. The light duty oil and grit interceptor units include Ø100mm or Ø150mm earthenware pipe projected from the tank outlet for pipeline connection

#### Unit Maintenance

- The efficiency of a Hynds Oil and Grit Interceptor system is dependent on the application, hydraulic loads and attention it receives.
- To obtain the full benefit of the unit, regular removal of trapped oils and grits is required.
- The cleaning frequency is determined after normal use and will vary with each application.
- Trapped pollutants removed from a Hynds Oil and Grit Interceptor must be disposed of in accordance with local authority regulations.
- The maintenance frequency is best determined by visual observation. During the first year of operation, a Hynds oil and grit interceptor system should be inspected monthly or bimonthly to determine the frequency of maintenance.
- Cleaning should be arranged when 50% of the hydrocarbon retention capacity is reached and should be conducted by approved waste removers.
- Cleaning involves the removal of all water and waste content within the chambers and sump vacuuming of the heavier sediments at the bottom of the chambers
- If tank entry is required for the manual removal of sediment, or for cleaning, then such an entry practice is classified as a Confined Space Entry, i.e. work in such an environment must be carried out to comply with the appropriate OSH Code of Practice, and in accordance with AS2865 1995 - "Safe Working in Confined Space".
- The Oil and Grit Interceptor should be refilled with clean water to allow the system to operate effectively straight after maintenance.

#### Installation

- Precast concrete tank and lid are supplied separately for easier transport, unloading and installation.
- Hynds Oil and Grit Interceptors are manufactured with lifting anchors cast into the concrete and must be handled using a spreader beam.
- Tank units must be placed on solid compacted level hardfill and surrounded by compacted backfill to avoid settlement.
- Pipework and couplers are not supplied as part of the unit.

FIG. 1 HD oil and grit interceptor

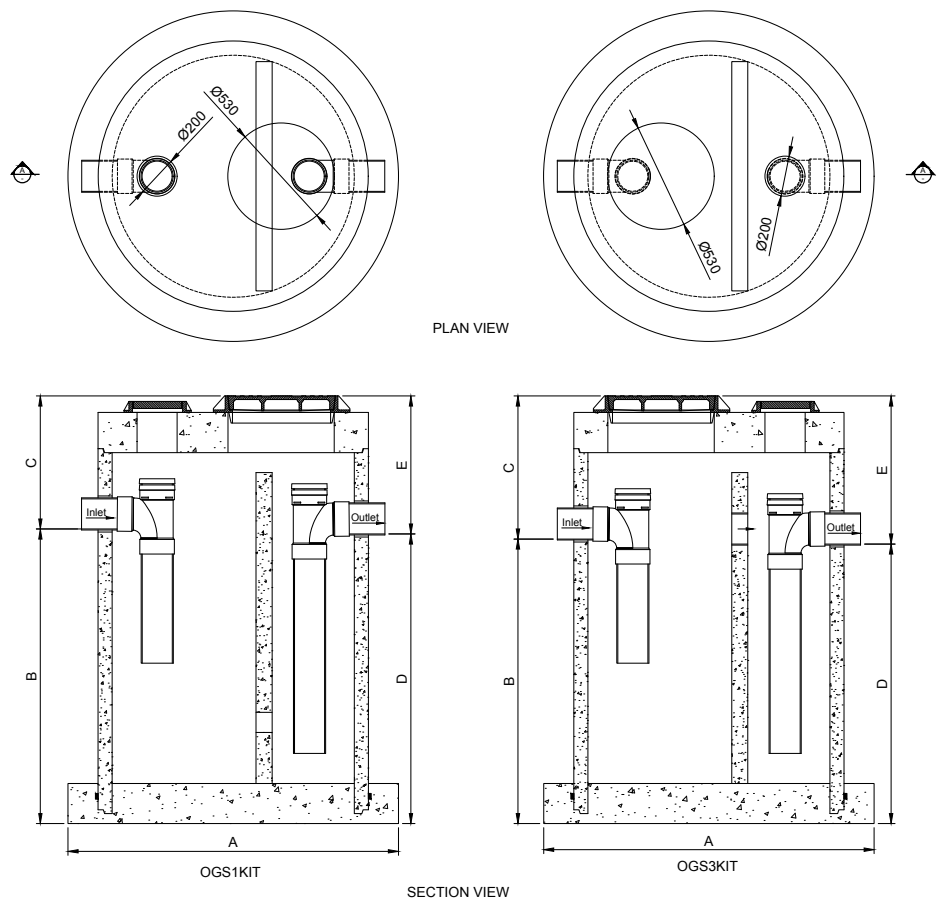


TABLE 1 3000L Hynds Heavy Duty Kit system - Oil and Grit Interceptor system

Product codes: OGS1KIT + OGS3KIT		Total tank Capacity: 3000 L								
Chamber	Internal Fittings Ø (mm)	Chamber dimensions ( Refer Figure 1 )					Lid Thickness (mm)	Lid openings	Total Mass (T)	Shipped from
		A (mm)	B (mm)	C (mm)	D (mm)	E (mm)				
OGS1KIT	150	1647	1469	663	1444	688	200	2	3.51	Auck/Chc
OGS3KIT	150	1647	1419	713	1394	738	200	2	3.86	Auck/Chc

TABLE 2 4500L Hynds Heavy Duty Kit system - Oil and Grit Interceptor system

Product codes: OGS4KIT + OGS5KIT		Total tank Capacity : 4500 L								
Chamber	Internal Fittings Ø (mm)	Chamber dimensions ( Refer Figure 1 )					Lid Thickness (mm)	Lid openings	Total Mass (T)	Shipped from
		A (mm)	B (mm)	C (mm)	D (mm)	E (mm)				
OGS4KIT	150	2307	1167	708	1142	733	200	3	6.201	Auck/Chc
OGS5KIT	150	2307	1117	758	1092	783	200	3	6.201	Auck/Chc

SHOULD BE USED IN CONJUNCTION WITH THE HYND'S HEAVY DUTY KIT SYSTEM | SUPPLEMENTARY FIG 3

TABLE 3 Hynds Light duty oil and grit interceptor dimensions

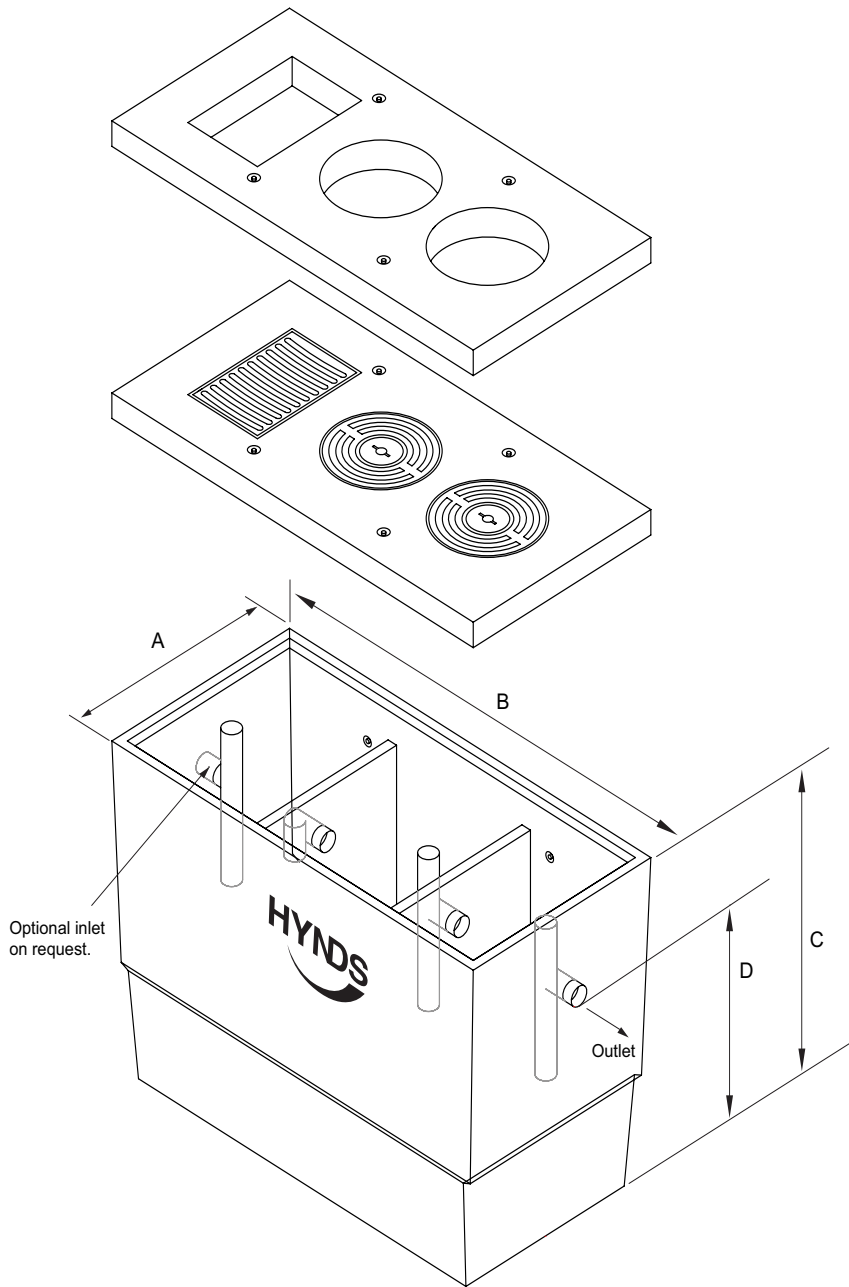
Product Code	Tank Capacity (Litres)	Internal Fittings Ø (mm)	Number of Chambers	Dim A (mm)	Dim B (mm)	Dim C (mm)	Dim D (mm)	Lid Thickness (mm)	Mass (kg)	Shipped From
OG3000T100	3000	100	3	1150	2340	1700	1335	150	2452	Hamilton
OG3000T150		150	3	1150	2340	1700	1335	150	2452	Hamilton
OG3300T3100	3300	100	3	1200	2575	1700	1330	150/200	3224	Palmerston
OG3300T3150		150	3	1200	2575	1700	1330	150/200	3224	Palmerston
OG3300LT100	3300	100	3	1150	2350	1840	1475	200	2950	Christchurch
OG3300LT150		150	3	1150	2350	1840	1475	200	2950	Christchurch

**Note:** Suggested invert level (dimension D) is indicative only and may vary depending on inlet/outlet pipe O.D.'s  
Prices may vary depending on your location.

TABLE 4 Lid Range

Product Code	Description	Application	Mass (kg)	Shipped from
OGL3000.150NC	150 mm Height Light Duty Oil & Grit Lid without Cast Iron Covers and Grate	3000L Tank	689	Hamilton
OGL3000.150L	150 mm Height Light Duty Oil & Grit Lid with Cast Iron Covers and Grate		820	Hamilton
OGL3000.150H	150 mm Height Heavy Duty Oil & Grit Lid with Cast Iron Covers and Grate		932	Hamilton
OGL3000.200H	200 mm Height Heavy Duty Oil & Grit Lid with Cast Iron Covers and Grate		1210	Hamilton
OGL3300T3.150H	150 mm Height Light Duty Oil & Grit Lid without Cast Iron Covers and Grate	3300L Tank	918	Palmerston
OGL3300T3.200H	200 mm Height Heavy Duty Oil & Grit Lid without Cast Iron Covers and Grate		1285	Palmerston
OGL3300.200H	200 mm Height Heavy Duty Oil & Grit Lid with Cast Iron Covers and Grate		1188	Christchurch

FIG. 2 Light duty Hynds interceptor units are available with a range of lid thicknesses and options with cast iron access covers.



SHW HYNDS ULTRAVIOLET INTERCEPTOR SYSTEM | STORMWATER | PG 2

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## **Appendix D - Grease trap & carwash work verification forms**



### BP SITE CARWASH DRAINAGE WORK VERIFICATION FORM:

**DATE:** 13-12-2021    **SITE TYPE:** Service Station    **LOAD PLAN ID:** 2312    **WASTE FORM NUMBER:** B  
**SITE NAME:** BP CONNECT HORSHAM DOWNS    **CAR WASH INTERCEPTOR TYPE:** 2 STAGE  
**SITE ADDRESS:** Cnr Horsham Downs Rd and Thomas Rd, Hamilton    **SERVICE TYPE:** PROGRAM  
**SITE E-MAIL ADDRESS:** bphorshamdowns@bizniz.co.nz    **SITECARE JOB NUMBER:** 27763  
**CLIENT W/O:**    **SERVICE SCOPE:** COMPLETE

<b>CARWASH INTERCEPTOR CESS-PIT</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>35</u> CM
IS THIS CHAMBER OIL / HYDROCARBON CONTAMINATED	Yes
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
<b>CARWASH INTERCEPTOR CHAMBER 1</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>15</u> CM
IS THIS CHAMBER OIL / HYDROCARBON CONTAMINATED	Yes
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
<b>CARWASH INTERCEPTOR CHAMBER 2</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>25</u> CM
IS THIS CHAMBER OIL / HYDROCARBON CONTAMINATED	Yes
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
<b>CARWASH INTERCEPTOR CHAMBER 3</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>N/A</u> CM
IS THIS CHAMBER OIL / HYDROCARBON CONTAMINATED	
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	
<b>CARWASH ACO DRAINAGE</b>	
TOTAL AMOUNT OF ACO DRAINAGE ON CARWASH DRAINAGE SYSTEM (METERS)	<u>N/A</u> MTRS
HAS ANY ACO DRAINAGE BEEN EMPTIED ON THIS VISIT (IF YES INDICATE METERS)	<u>      </u> MTRS
HAVE ALL ACO DRAINAGE GRATES BEEN CHECKED FOR OBSTRUCTIONS AND ARE NOW FREE-FLOWING	
<b>IS THERE ANY DAMAGE OR FAULTS OF DRAINAGE SYSTEM? (if yes, note fault below)</b>	No
N/A	
<b>IF YES, HAVE YOU REPORTED A PROACTIVE AND PHONED THE OFFICE TO ADVISE?</b>	N/A
<b>ARE THERE ANY WORKS REQUIRED THAT HAVE NOT BEEN COMPLETED ON THIS VISIT?</b>	No
N/A	

SITE MANAGER SIGNATURE:

TECHNICIAN SIGNATURE:

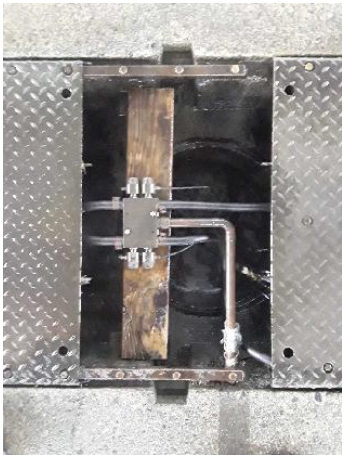
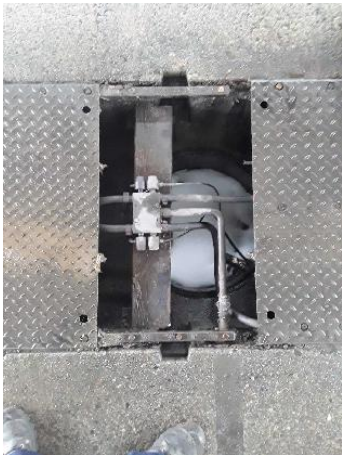
SITE MANAGER NAME:

TECHNICIAN NAME:





Please take photos of all areas worked on today. These will need to be relevant to the task above  
*6 Mandatory photos:*




**SITE GREASE TRAP DRAINAGE WORK VERIFICATION FORM: 101397**
**DATE:** 30-11-2021 **SITE TYPE:** Service Station **LOAD PLAN ID:** 2311

**WASTE FORM NUMBER:** H

**SITE NAME:** BP CONNECT HORSHAM DOWNS

**GREASE TRAP TYPE:** 3 STAGE

**SITE ADDRESS:** Cnr Horsham Downs Rd and Thomas Rd, Hamilton

**SERVICE TYPE:** PROGRAMMED

**SITE E-MAIL ADDRESS:** bphorshamdowns@bizniz.co.nz

**SITECARE JOB NUMBER:** 26341

**CLIENT W/O:**

<b>GREASE TRAP CHAMBER 1</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>5</u> CM
IS THIS CHAMBER CONTAMINATED WITH FAT/GREASE	Yes
IS THIS CHAMBER BACTERIALLY CONTAMINATED	Yes
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
HAVE THE INSPECTION HATCHES BEEN SECURELY REPLACED ON THIS CHAMBER	Yes
<b>GREASE TRAP CHAMBER 2</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>5</u> CM
IS THIS CHAMBER CONTAMINATED WITH FAT/GREASE	Yes
IS THIS CHAMBER BACTERIALLY CONTAMINATED	Yes
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
HAVE THE INSPECTION HATCHES BEEN SECURELY REPLACED ON THIS CHAMBER	Yes
<b>GREASE TRAP CHAMBER 3</b>	
DEPTH OF SOLID SEDIMENT IN CHAMBER (CM)	<u>0</u> CM
IS THIS CHAMBER CONTAMINATED WITH FAT/GREASE	Yes
IS THIS CHAMBER BACTERIALLY CONTAMINATED	No
HAS THIS CHAMBER BEEN SERVICED ON THIS OCCASION	Yes
HAVE THE INSPECTION HATCHES BEEN SECURELY REPLACED ON THIS CHAMBER	Yes
<b>IS THERE ANY DAMAGE OR FAULTS OF GREASE TRAP SYSTEM?</b> <i>(if yes, note fault below)</i>	
No	
<b>IF YES, HAVE YOU REPORTED A PROACTIVE AND PHONED THE OFFICE TO ADVISE?</b>	
No	
<b>ARE THERE ANY WORKS REQUIRED THAT HAVE NOT BEEN COMPLETED ON THIS VISIT?</b>	
No	
N/A	

**SITE MANAGER SIGNATURE:**
**TECHNICIAN SIGNATURE:**
**SITE MANAGER NAME:**
**TECHNICIAN NAME:**



Please take photos of all areas worked on today. These will need to be relevant to the task above  
*6 Mandatory photos:*



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## Appendix E - Carwash wastewater characterisation

**Table 8: bp carwash water quality sampling for all parameters summary 2010-2022**

	Total Petroleum Hydrocarbons				General Parameters					
	C7 - C14*	C15 - C36	C7 - C36 (Total)	pH	Oil & Grease	Total Suspended Solids	BOD5 - Total	Total Kjeldahl Nitrogen (TKN)	Total Phosphorus	Carbonaceous Biochemical Oxygen Demand
Average	2.41	7.17	9.20	6.97	7.71	38.46	49.67	3.53	0.25	54.63
Minimum	0.3	0.4	0.5	6.2	4	6.1	6	1	0.1	17
Maximum	8.8	48	48	8	21	83	117	10	0.6	187
Exceedances	0	0	0	0	0	0	0	0	0	0
Number of Sites	36	36	39	39	4	5	3	2	2	2
Number of Samples	157	157	163	157	21	37	18	19	19	19

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## **Appendix F - Material Safety Data Sheets**



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## Appendix G - HCC trade waste management plan checklist

The management plan shall contain, but shall not be limited to the following provisions:

HCC Waste Management Plan Requirements	bp TWMP Ref:
a) Processes to ensure that this Agreement, including Maximum Discharge Levels, is not breached (taking into account factors within the Consent Holder's control and reasonable contemplation);	5.1 – 5.5
b) A site drainage plan approved by Council that identifies all wastewater, trade waste, water and stormwater connections and discharge locations, receiving waterways or areas which receive treated;	Appendix A
c) Cleaner production techniques and waste minimisation programmes which detail methods, proposed to improve the quality/quantity of the trade waste discharge including time frame and implementation dates;	5.1 & 5.2
d) Accountability and final destination of any waste disposal program and effective solids and liquid waste disposal procedures;	5.4
e) Continuous discharge flow and quality monitoring processes;	NA
f) Pre-treatment processes including waste removal, maintenance schedule and servicing;	5.1 & 5.2
g) Contingency management and emergency spill procedures; developed for responding to situations which may arise at their premises but will pose a threat to the environment or the sewage system if allowed to occur without an adequately formulated response plan;	5.5
h) Preventive Plan implemented to identify possible potential hazards and carry out the appropriate corrective action to prevent accidents or discharges of unauthorised trade waste arising from these hazards;	5.5
i) Reporting structure for issues of notification and protocols for breaches of this Consent;	5.3
j) Procedures to ensure that no Prohibited Trade Waste enters the Wastewater System; and	5.1-5.5
k) A self-monitoring plan detailing sampling and analysis of Trade Waste Characteristics with the specific purpose of monitoring, preventing a breach of Maximum Discharge Levels, or the Bylaw, and sampling and analysis to be completed in the event of a breach occurring.	5.3

### Submission #33

Name: **Pip Thompson**

Organisation: **Napier City Business Inc**

Suburb: **Napier South**

Attachments Y/N: **Yes**

Do you want to speak at the hearing? **Yes**

**Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

**Please provide any further comments on the proposed Bylaw**



**Napier City Business Inc.  
Trade Waste and Wastewater bylaw Submission May 2022**

Napier City Business Inc. represents 450 businesses and over 2,500 staff. After consultation and communication with affected members, this submission is written on their behalf.

Napier City Businesses understands Napier City Council is proposing changes to the trade waste and wastewater bylaw, offering better environmental protection in the future. The proposed bylaw includes expanding the consenting coverage, including the Central Business District, resulting in a new administration manual and a user-pay charging model over a certain threshold.

While we support the proposed bylaw, we would like more commitment to long timeframes when implementing the bylaw, including a 5 to 6 months trial period for meters that will not be charged. This trial period will help educate our businesses on the trade-waste impact on the wastewater network and environment and the costs that arise when not processing liquid waste correctly. We also request the development of an educational manual on discharging wastewater responsibly to facilitate effective long-term change.

As a reminder, Napier City Council increased commercial rates on average by 30% in the CBD in 2021/2022. While we appreciate land values have increased and rates need to reflect the property value, we cannot deny it has been a very challenging two years for the business financially. Especially for hospitality, introducing another charge will be unwelcomed right now; therefore, we recommend this charge not be enforced until 2023/2024.

In summary:

We support the proposed bylaw with the following conditions:

- 5 to 6 month trial period running the meters free of charge reporting monthly chargeable amounts to affected businesses
- NCC develop an educational manual on discharging wastewater responsibly to facilitate effective long-term change
- The charging model is introduced in the 2023/2024 financial year

Pip Thompson  
General Manager  
Napier City Business Inc





**Submission #34**Name: **Grant Russell**Organisation: **Port of Napier Ltd**City: **Hastings**Attachments Y/N: **Yes**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

See attached.

**Please provide any further comments on trade waste consenting requirements****Do you support phasing implementation to allow greater time for compliance to be achieved?****Please provide any further comments on the timing of new regulations being implemented****Do you support the revised Trade Waste charging model?****Please provide any further comments on the revised charging model****Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?****Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?****Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**



25 May 2022

Cameron Burton  
Napier City Council  
Private Bag 6010  
NAPIER 4142

**Attention: Cameron Burton – Manager Environmental Solutions**

## **NAPIER PORT SUBMISSION ON THE NCC TRADE WASTE AND WASTEWATER BYLAW REVIEW 2022**

Port of Napier Limited (Napier Port) is in receipt of the Napier City Council (NCC) trade waste and wastewater submission request on the review of this Bylaw 2022.

Napier Port operates a competitive regional and international commercial, cargo, container handling, logistics, shipping and cruise services and offering on a 24-hour basis.

We appreciate the opportunity to provide a submission as set out below and provide a submission on the following documents:

- NCC Integrated Trade Waste and Wastewater Bylaw 2022; and
- Administration Manual

### **Submission**

1. We agree with intent of the Integrated Trade Waste and Wastewater Bylaw 2022 and the accompanying Administration Manual.
2. Port activities involving trade waste and wastewater are generally limited to 'domestic type' wastewater disposal, such as the use of toilets, showers, hand basins and the like from port staff, contractors and visitors. Wastewater would by all accounts meet the Permitted Discharge Characteristics as set out in Administration Manual (Schedule A).
3. With limited contribution to the public wastewater network as a permitted discharge under the Bylaw, it is anticipated that there would in all likelihood be no fees and charges under the Bylaw, imposed upon Napier Port.
4. Wastewater generated from both inland port operations located at Thames Street, Pandora would generally fall under the Permitted Discharge Characteristics as set out in Administration Manual (Schedule A). As with the main port location at Breakwater Road, 'domestic type' wastewater disposal, such as the use of toilets, showers, hand basins and the like would be from port staff, contractors and visitors. Container washwater would be considered the key wastewater discharge and that discharge is reticulated through the existing wastewater network.
5. No trade waste is discharge from the site at Napier Port nor its inland port operations located at Thames Street, Pandora.
6. With limited contribution, if any, to the public trade waste network as a permitted discharge under the Bylaw, it is anticipated that there would in all likelihood be no fees and charges under the Bylaw, imposed upon Napier Port.



7. Napier Port are consent holders authorised by the Regional Council to discharge stormwater via the Thames / Tyne Street waterways. This avoids any connections to any NCC reticulated systems from these sites.
8. We understand that discharge volumes greater than 5m<sup>3</sup>/day and a flow greater than 2 L/S, and that the characteristics of set out in the Administration Manual (Schedule A) are met then, as noted earlier, no fees and charges would be applicable.
9. Napier Port is able to 'throttle' flows so that the wastewater discharges do not flow greater than 2 L/s.

#### **Administration Manual**

We provide the following general comments:

#### **Part A. Requirements Common to all Water Services**

10. Does a definition for 'Controlled Wastewater' need to be provided?

#### **Part B. Trade Waste**

#### **Registration Forms**

11. We note throughout the Administration Manual the reference to a Registration Form. While we note that this prescribed Registration Form will be available 'via the Council's website', we are unclear what the Registration Form entails as no pro-forma was attached nor able to be sourced from the Council's website.
12. We note under the heading 'Approval Notices':

**B.3.1** Consideration Criteria for Approval Notice Applications and **B.3.2** Site Inspections that these respectively are to be 'added at a later date'. Napier Port wish to be informed of these once they become available.

This submission does not limit the views that may be expressed or submitted upon by those entities, companies and / or organisations that lease and subsequently operate from land at Napier Port.

Thank you for the opportunity for Napier Port to provide a written submission on the bylaw.

We do not wish to be heard at the Hearing set down for 23 and 24 June 2022.

We look forward to the continued involvement and ongoing consultation and engagement with NCC.

Yours sincerely,

**Michel de Vos**  
General Manager Infrastructure Services

[Redacted signature]

**Submission #35**Name: **Garry Venus**Organisation: **AFFCO NZ Limited**City: **Auckland**Attachments Y/N: **No**Do you want to speak at the hearing? **Yes****Do you support the expanded trade waste consenting requirements?**

Yes

**Please provide any further comments on trade waste consenting requirements**

AFFCO NZ Limited (AFFCO) operates a facility at 26 Tyne Street in Napier, employing 50 staff, which discharges trade waste into the Council's tradewaste system. AFFCO generally supports initiatives by Council to improve environmental performance - however the Company has reservations about the limits for many of the components set out in Table 4 of the Draft Administration Manual - particularly limits for Ammonia and for Sulphide/Sulphate. AFFCO's submission is that all the limits in Schedule A of the Manual should reflect actual risk to the Tradewaste collection system and ultimately to the receiving environment.

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

The proposed limits in Table 4 of the Draft Administration Manual are unduly restrictive and will require potentially significant plant modification for compliance notwithstanding that AFFCO considers its current discharge poses no more than a minor risk to the tradewaste system.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

AFFCO generally supports this approach subject to clarification and agreement on how the detailed cost sharing model will be applied.

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack**

Not relevant to AFFCO's operations

**Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements**

Not relevant to AFFCO's operations

**Please provide any further comments on the proposed Bylaw**

AFFCO would be pleased to provide further information at the upcoming hearings.

**Submission #36**Name: **Tom Ryan**Organisation: **New Zealand Wool Testing  
Authority Limited**Suburb: **Ahuriri**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the expanded trade waste consenting requirements?**

No

**Please provide any further comments on trade waste consenting requirements**

No further comments

**Do you support phasing implementation to allow greater time for compliance to be achieved?**

Yes

**Please provide any further comments on the timing of new regulations being implemented**

Given that this may involve plant re-design or alteration a reasonable timeframe should be considered by Council.

**Do you support the revised Trade Waste charging model?**

Yes

**Please provide any further comments on the revised charging model**

No further comments

**Do you support the introduction of WasteTrack for Hazardous Waste Tanker Operators?**

Yes

**Please provide any further comments on the introduction of WasteTrack****Do you support the requirement for food premises to have properly maintained grease traps?**

Yes

**Please provide any further comments on grease trap requirements****Please provide any further comments on the proposed Bylaw**

# WATER SUPPLY SUBMISSIONS

**Submission #1**Name: **David Bredda**

Organisation:

Suburb: **Poraiti**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

The bylaw should legislate the minimum acceptable levels of additives. This should legislate the ongoing chlorination of water, and more importantly, the addition of flouride to the water supply. Fluoridating the drinking water will align Napier with the recognised best practice and most responsible councils in the country.



## Submission #2

Name: **Chad Tareha**

Organisation:

Suburb: **Taradale**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

### Submission #3

Name: **Nicholas Hinks**

Organisation:

Suburb: **Bay View**

Attachments Y/N: **No**

Do you want to speak at the hearing? **Yes**

**Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

I think people whom draw water for community purpose ie potable water delivery should still be allowed to draw from any where as long as there is a cleaning and testing proses in place

### **Submission #4**

Name: **Morgan Conneely**

Organisation:

Suburb: **Bluff Hill**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

## Submission #5

Name: **Deneice Marshall**

Organisation:

Suburb: **Tamatea**

Attachments Y/N: **No**

Do you want to speak at the hearing?

**Do you support the proposed Water Supply Bylaw?**

No

### Please provide any further comments on the proposed Bylaw

I am concerned about the possibility of our water supply being fluoridated. 1. Is there any way I could get a filter installed for my drinking water that removes fluoride from the water? I do have a carbon filter for the whole house to remove the chlorine in the water, but that will only remove chlorine, not fluoride. 2. I think a better way is to give fluoride tablets to children under 10, as my dentist informed me many years ago fluoride does not given any benefits for people over 10. These could also be given to pregnant women and women who are breastfeeding. 3. Also I think an education programme to teach parents how to teach their children the correct way to brush their teeth and also with fluoride tablets. I do realise that there is a very large number of parents who probably wouldn't give their children fluoride tablets as they appear not to care for their children, but I wonder if the tablets were supplied free then they might given them to their children. Giving tablets until each child is 10, could also be cheaper than fluoridating the entire country's water. 4. Fact. Children's teeth can be protected without fluoridation of the water. My three children have very few fillings - the eldest is 53 and he last had three pit fillings because he was born with a condition that three of his teeth didn't develop a full coating of enamel. I think he has had two or three other fillings in his lifetime. The second child, a daughter is 52 and, although she has dental checkups, has never had a filling in her life. The youngest is 49 and he has had three fillings and one extraction as an adult. None of them had fillings because of dental decay while at school. I was very strict about oral hygiene and taught them how to brush their teeth. They did take fluoride tablets until they were 10 as advised by the dental nurse. 5. I do not believe we, as an entire population, should be punished or be put at any health risk, mainly kidney disease as fluoride can affect your kidneys, just because there are parents who can't be bothered to look after their children's health and teeth. 6. Would the three waters campaign give free urine or blood tests to everyone in the country on a regular basis to check they do not have too much fluoride in their body, which is done at Ravensdown Fertiliser Works to their workers who work in the manufacturing plant dealing with Florida rock as it has high levels of fluoride and anyone who has higher than normal levels of fluoride are taken out of the plant and given another job for at least two months until their levels return to normal. This was their rule back in the 1970s & 1980s so I don't know if that is still the practice. 7. Why give fluoride to people with dentures? They do not need fluoride, nor do the rest of the population over 10 years of age. Thank you for your consideration of this. I tried to send it to Ashley Bloomfield but the gmail system wouldn't deliver it.

**Submission #6**Name: **Paul Thomsen**

Organisation:

Suburb: **Greenmeadows**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

As long as it does support access to CLEAN drinking water across the city , I'm all for it , but by CLEAN , I hope you mean PURE , as in , no chlorine , fluoride or any other contaminants ! If some people wish to ingest those things , they can purchase the tablets themselves ! You were elected on such a promise , so stay true .

### **Submission #7**

Name: **Geordie Dewhirst**

Organisation:

Suburb: **Onekawa**

Attachments Y/N: **No**

Do you want to speak at the hearing?

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

### **Submission #8**

Name: **Wes Smith**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

**Submission #9**Name: **Rebekah Mitter**

Organisation:

Suburb: **Pirimai**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

although I support this I am strongly in favour in principle the idea of the 3 waters project. It is untenable for councils to only locally manage their water systems. It is untenable for Napier and all HB residents not to pay for metered water. So much of it is wasted and not treated as the valuable and scarce commodity that it is. However, in saying that I do agree that the current govt proposal also isn't fit for purpose. More consultation and framework building is required but it should be working toward a unified goal, not for parochial fiefdoms on water.



### **Submission #10**

Name: **Bruce Taylor**

Organisation:

Suburb: **Bluff Hill**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

Leave it alone

### **Submission #11**

Name: **Brian Young**

Organisation:

Suburb: **Greenmeadows**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

NO! NO ! To Three Waters. A 20% Racial group having 50% say is undemocratic and unlawful. Imagine a Hui discussion for every decision while their knowledge of water management is non existent, similar to my knowledge.

**Submission #12**Name: **Evan Vance**

Organisation:

Suburb: **Tamatea**Attachments Y/N: **No**Do you want to speak at the hearing? **No****Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

The water supply needs to be kept under local council control to provide the necessary service to the community. Having it run by government with an iwi driven agenda is not in the communities best interest, & is not going to improve the water quality.

### Submission #13

Name: **Rob Vork**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

### **Submission #14**

Name: **Roland Brandsma**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

### **Submission #15**

Name: **Manish Kumar**

Organisation:

Suburb: **Napier South**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

### **Submission #16**

Name: **Colleen Gray**

Organisation:

Suburb: **Bluff Hill**

Attachments Y/N: **No**

Do you want to speak at the hearing? **No**

**Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

### **Submission #17**

Name: **Kim Maitland**

Organisation: **Hawke's Bay District Health Board**

Suburb: **Napier South**

Attachments Y/N: **Yes**

Do you want to speak at the hearing? **Yes**

**Do you support the proposed Water Supply Bylaw?**

Yes

**Please provide any further comments on the proposed Bylaw**

See attached submission



## Corporate Services



24 May 2022

Napier City Council  
Private Bag 6010  
Napier 4142

Our Ref: SUB006 22

### TO WHOM IT MAY CONCERN

#### Proposed Water Supply Bylaw 2022

Thank you for the opportunity to comment on the draft proposed bylaws for Water Supply.

The Hawke's Bay District Health Board (HBDHB) has a responsibility under the New Zealand Public Health and Disability Act 2000 to advocate for environmental conditions that contribute to the health of the community. HBDHB supports the Water Supply 2022 Bylaw.

In addition to supporting the Bylaw we recommend that Napier City Council considers extending water metering for all buildings connected to the water supply. The protection and preservation of our freshwater resources and aquifers is going to be a significant challenge now and into the future particularly as the effects of climate change take hold. Future proofing a water reticulation system that prioritises efficiency of water use and minimises water wastage and leakage are critical steps that Council should take. Even if metering is not used to determine water charges universal metering would provide invaluable data for managing the network more effectively.

In the first instance the requirement could be applied to all new buildings connecting to the water supply. HBDHB wish to speak on this submission.

Please contact:

Dr Nicholas Jones  
C/o Kim Maitland, Executive Assistant  
Hawke's Bay DHB  
(via email: [REDACTED])

Ngā mihi,

**Dr Nicholas Jones**  
Medical Officer of Health  
Hawke's Bay District Health Board

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### POPULATION HEALTH SERVICE

Phone 06 878 8109 Fax 06 878 1374 Email: [firstname.lastname@hbdhb.govt.nz](mailto:firstname.lastname@hbdhb.govt.nz), [www.hawkesbay.health.nz](http://www.hawkesbay.health.nz)  
2<sup>nd</sup> Floor, Corporate Office, cnr McLeod Street & Omaha Road, Private Bag 9014, Hastings, New Zealand

**Submission #18**Name: **Cameron Ellis**Organisation: **Silver Lake Trust**Suburb: **Taradale**Attachments Y/N: **No**Do you want to speak at the hearing? **Yes****Do you support the proposed Water Supply Bylaw?**

No

**Please provide any further comments on the proposed Bylaw**

This submission is made on behalf of the Silver Lake Trust. The Silver Lake Trust distributes city water from a single council supply point on Puketapu Rd to 22 residential properties within the Te Roera Hills development in Taradale. The Water Bylaw states that the Te Roera Hills connection to NCC infrastructure is an on-demand & extraordinary use connection. Due to this, residents of Te Roera Hills are currently being charged \$1.12/m<sup>3</sup> for every cubic meter of water used. The majority of residential properties in Napier pay \$0.81/m<sup>3</sup> for the first 300m<sup>3</sup> of water only, with anything above and beyond 300m<sup>3</sup> for free. This is calculated by dividing the \$244 yearly rate by 300m<sup>3</sup>. This equates to Te Roera Hills residents paying 38% more for water than the majority of Napier for the first 300m<sup>3</sup> and then paying infinitely more for anything above and beyond the 300m<sup>3</sup>. Due to all infrastructure being installed and paid for in full by the developer and privately owned, residents must also contribute towards maintenance, insurance, and body corp fees to bill and collect payments from each resident individually. All items which are included within the \$0.81m<sup>3</sup> charge to the majority of Napier properties. Council in this instance, simply reads one water meter, bills one user, has no more additional infrastructure to insure and maintain, and sends out a bill for 38% more than the rest of Napier. Keep in mind that water rates are not for the actual water, but for the delivery of that water as water is free. As it is obvious that our residents are being charged unfairly, Te Roera Hills should be given water not only at what the majority of residential Napier receives it for, but at a heavily discounted rate, given it is simply a residential bulk supply point in NCC's eyes.