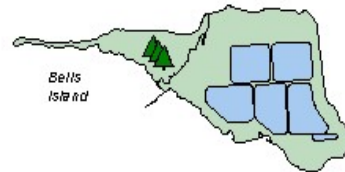


Nelson Regional Sewerage Business Unit



8 May 2020

Mapua District Community Association

Mapua Community Hall
72 Aranui Road
Mapua 7005

Via email: info@ourmapua.org

Attention: Marion Satherley

Dear Madam

Resource Consent Renewal - Moturoa/ Rabbit Island Biosolids Application to Land

BACKGROUND

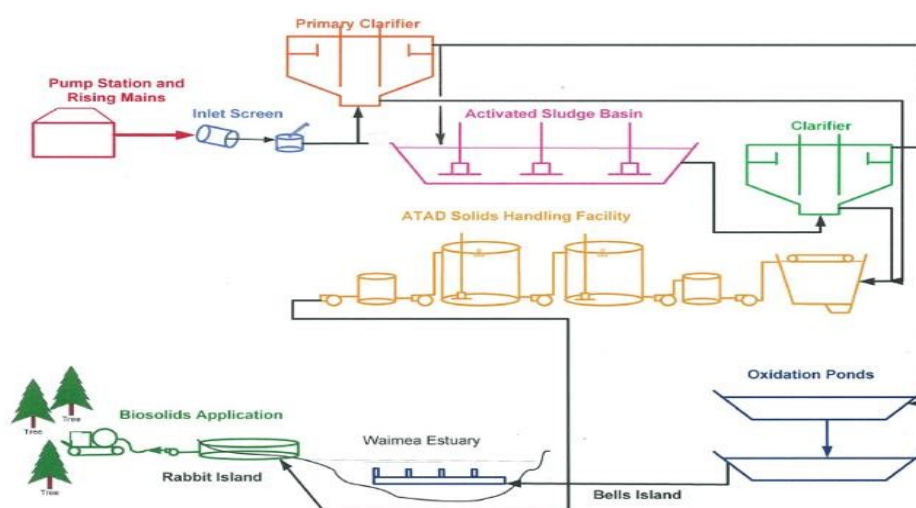
- 1 The Nelson Regional Sewerage Business Unit (NRSBU) operates the Bell Island Wastewater Treatment Plant (WWTP) which receives and treats wastewater from Tahunanui, Stoke, Richmond, Brightwater, Wakefield, and Mapua. The consents for the WWTP and discharge to the Waimea Inlet have recently been renewed for a term of 20 years.
- 2 The NRSBU also holds resource consents for the application of biosolids at Moturoa/ Rabbit Island:
 - 2.1 Discharge permit authorising the discharge biosolids to land (forestry blocks)
 - 2.2 Land use consent authorising the use of Rabbit Island for the discharge of biosolids and associated buildings and structures
 - 2.3 Coastal permit authorising the construction and occupation of an underground pipeline from Bell Island to Rabbit Island
- 3 The biosolids discharge permit is due to expire and the NRSBU is in the process of renewing this and associated consents, including a new discharge permit to authorise the discharge of odour to air. An application will be lodged with the Tasman District Council (the consent authority) by **7 August 2020** and will be supported by an Assessment of Environmental Effects (AEE).

ENGAGEMENT

- 4 The NRSBU recognises that engagement is a key component of the resource management process and has identified your Association as a party that may be interested in the biosolids operation. The NRSBU would welcome your feedback in the pre-consenting process.
- 5 Given the implications of COVID-19, the NRSBU asks that you provide feedback by **Friday 15 May 2020**. If required, the NRSBU will follow up by phone and/ or virtual meeting - Skype or similar. Contact details for the NRSBU's consent manager are located at the end of this letter.

WHAT ARE BIOSOLIDS?

- 6 A secondary byproduct of the wastewater treatment process is the production of sludge. The sludge is treated through Autothermal Thermophilic Aerobic Digestion (ATAD) which heats the sludge to high temperatures for a prolonged period. This digestion process converts sludge to class A biosolids which are suitable for application to land. The biosolids are well pasteurised and the treatment process eliminates pathogens to the extent that they are not considered to pose a risk to human health. The treatment process is illustrated below.



THE CURRENT APPROACH

- 7 The existing discharge permit authorises the NRSBU to apply biosolids to forestry blocks subject to appropriate conditions. The conditions require the NRSBU to undertake regular monitoring of biosolids quality, soil, groundwater and the coastal marine environment.
- 8 Consent conditions prescribe that no biosolids are to be applied to identified archaeological sites, culturally significant sites, and ecologically significant areas (exclusions zones). A buffer zone from the mean high-water springs line minimises potential effects of the biosolids operation on recreational use of Moturoa/ Rabbit Island and takes into account potential sea level rise/ storm surge events.

WHY APPLY BIOSOLIDS ON MOTUROA/ RABBIT ISLAND?

- 9 Forestry has been the predominant land use at Moturoa/ Rabbit Island since the 1920's and NRSBU has been applying biosolids to forestry blocks at Moturoa/ Rabbit Island for the last 24 years. The biosolids provide nutrients which supplement the nutrient poor soils found at Moturoa/ Rabbit Island and increase tree growth. These nutrients replace conventional fertilisers. The NRSBU's goal is to maintain 100% beneficial reuse of biosolids into the future.

THE APPLICATION METHOD

- 10 Biosolids are currently applied via a heavy-duty travelling irrigator that tracks into forestry rows and sprays liquid biosolids on its return trip. Biosolids are applied at varying application rates dependant on tree age. The consent conditions require the NRSBU to adhere to a maximum average rate of nitrogen per hectare per year.
- 11 A biosolids management plan details operational procedures including monitoring and record keeping, block selection and spray schedule, pre and post spray checks, signage, health and safety requirements and emergency/ contingency planning.

- 12 The current application method is a proven cost efficient and environmentally sustainable way of beneficially utilising the biosolids.

ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

- 13 The NRSBU has commissioned NIWA to undertake a public health risk assessment and the AEE will consider existing monitoring data and results related to groundwater, soil, estuarine health, and odour complaints. It will also consider alternative options for biosolids disposal as required under the Resource Management Act.
- 14 The NRSBU is engaging with Te Tau Ihu iwi and is consulting with key stakeholders including the District Health Board, environmental interest groups, recreational users of Moturoa/ Rabbit Island and the neighbouring Best Island and Mapua communities.
- 15 The NRSBU is committed to continuous improvement of the existing operation taking into account best practice requirements, relevant guidelines and regulations and where possible to respond to concerns raised in engagement.

HOW DO YOU PROVIDE FEEDBACK?

- 16 Katherine Forward a resource management lawyer at Duncan Cotterill has been appointed consent manager and is available to discuss the application and provide any further information you require. If you prefer, please contact me personally.
- 17 Please address all feedback to Katherine via email katherine.forward@duncancotterill.com by **15 May 2020**.
- 18 The following questions may assist to guide your feedback; however the NRSBU encourages you to address any matter that you consider is relevant to the application.
- 18.1 What is your role/ organisation?
- 18.2 Do you have a key person from your organisation that you can appoint for future correspondence and communications?
- 18.3 What do you see as the positives of the application of biosolids at Moturoa/ Rabbit Island?
- 18.4 Are you aware of any negatives of the application of biosolids at Moturoa/ Rabbit Island?
- 18.5 In considering the current approach what matters do you think the NRSBU should take into account?
- 18.6 If the NRSBU is to continue to apply biosolids at Moturoa/ Rabbit Island are there specific conditions that it should comply with?
- 18.7 What do you consider is an appropriate term of consent?
NB - the existing consent was granted for 25 years
- 18.8 How would you like the NRSBU to engage with you – email or phone?

Yours sincerely



Nathan Clarke

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Nelson Regional Sewerage Business Unit (NRSBU)

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