



Technical Note

To	Andrew Allsopp-Smith	Date	7 July 2025
From	Shane Moore	Project No	WWLA1147
Copy			
Subject	Delmore subdivision: tankering of untreated wastewater from the wastewater treatment plant		

1. Introduction

We understand from review of Apex Water's technical note¹ that the proposed conditions of consent require that during the summer months (December to February), at least 80% of discharge flows from the proposed subdivision must be trucked off-site, with the remaining 20% being discharged to the irrigation field or infiltration bed, as appropriate.

The treated waste streams will be pumped from the treatment plant, in a dedicated high-density polyethylene pipe, to a central collection point where infrastructure will be made available for the connection of a road tanker to the discharge pipework. The location of this pipework and the collection point for Delmore has been identified by McKenzie & Co and is addressed in its report and plans.

In addition, as a contingency option, the raw wastewater from the sewer network could also be discharged to the tanker load-out station described above.

Williamson Water & Land Advisory Ltd (WWLA) previously prepared a hazardous substances and industrial and trade activity (ITA) assessment of the proposed wastewater treatment plant². This technical note has been prepared as an addendum to that assessment, specifically to address the proposal to tanker treated and untreated wastewater from the wastewater treatment plant.

2. Assessment

Tankering of treated wastewater and reverse osmosis (RO) reject is not specifically addressed by this assessment as both products are treated to a high level and are not considered to be hazardous substances, presenting a low risk to human health or the environment in the event of a spill / loss of containment. Nevertheless, the measures set out in the note will also provide appropriate protection in relation to treated wastewater and RO reject, should a spill of these materials occur.

Raw sewage / untreated domestic wastewater is not technically classified a hazardous substance³, nevertheless it is environmentally hazardous. On this basis, if raw sewage is being tankered out some controls should be implemented to ensure that adverse effects do not arise should a spill occur during loading of the tanker trucks. Loading (connecting to, filling, and disconnecting from) the tanker trucks is the activity which presents the greatest potential for a spill to occur. We note that sewage conveyance networks (i.e. the pipeline to the collection point) are excluded from consideration under the ITA requirements (Section E33) of the Auckland Unitary Plan (AUP).

¹ Technical Note TN. 02 - Truck Movements and Volumes. Prepared for Vineway Limited by Apex Water, dated 2 July 2025.

² Delmore Subdivision: Hazardous Substances and ITA Assessment. Prepared for Vineway Limited by WWLA, dated 13 February 2025.

³ Since domestic wastewater generally has a biological oxygen demand (BOD) of far less than 10,000 mg/l.

We consider that potential effects on human health (excluding odour) and/or the environment associated with loading tanker trucks can be mitigated by:

- Inclusion of the loading activity under the environmental management plan (EMP) and spill response plan (SRP) that are to be prepared, as a condition of consent, for operation of the wastewater treatment plant.
- Design of the load-out area to drain to a single stormwater drain / catchpit with the ability to isolate this drain from stormwater during load-out operations (for example with a resilient seated gate valve).
- Ability to either pump-out or drain the catchpit back to the sewer network, or empty it via vacuum truck, if it becomes contaminated by a spill.
- Use of sodium hypochlorite spray to disinfect any small spills or drips that may occur during loading.

3. Closure

We trust this note meets your requirements but please contact the undersigned if you have any queries.

Yours sincerely,



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