

MEMO			
TO:	Board of Directors	FROM:	Brendan Wall
CC:		DATE:	20 August 2001
SUBJECT : Technical Committee Report on Objection to Proposed Decision – Reg. No. 137-1.			

Application Details	
Applicant:	Haytonvale Developments Limited.
Location of Activity:	Facility contained by the street frontages; 28 & 29 Sir John Rogerson's Quay, No's 10, 11, 12 & 13 Cardiff Lane and site east of No.10 Hanover Street East.
Proposed Decision issued:	06/06/01
Objection received:	28/06/01
Circulation of objections:	10/7/01
Inspector:	Mr. Malcolm Doak

Objections received:

Objection by Third Parties 1. Dublin Corporation.

Consideration of the objections.

The Technical Committee (TC) Brendan Wall, (Chairperson), Damien Masterson and Kevin Mc Donnell (Committee members) has considered all of the issues raised and this report details the Committee's recommendations following the examination of the objection.

Objection No 1: Dublin Corporation (28/06/01)

Ground 1 – The omission of the Corporation's monitoring requirements and the omission of it's charges:

Dublin Corporation in this objection states that the Corporation as Sanitary Authority, is responsible for the maintenance and care of its Sewer Network, Pumping Stations and Treatment Works. It is essential that the Corporation is aware of the quantity and characteristics of all trade effluent, discharging to its Sewer Network. All Trade Effluent Licences granted by the Corporation are subject to conditions designed to minimise the impact on the sewer system and the environment. Consequently monitoring requirements are essential to ensure that no adverse impacts arise from discharge and in the event of

an adverse discharge it should be detected at the earliest possible date so that remedial action can be initiated.

The Corporation must be reimbursed for its costs in providing this service in accordance with the Acts and the “Polluter Pays Principle”.

All existing licensed discharges have conditions requiring monitoring and reporting arrangements together with charges for monitoring, treatment and disposal and equity therefore requires that similar conditions apply in this case.

The consent dated the 22nd March 2001 requires an annual payment of £17.56 per cubic metre of trade effluent and an annual monitoring charge of £2,600 and accordingly these conditions should apply to any licence granted.

Technical Committee’s evaluation

The Technical Committee considers that the Sanitary Authority charges as specified in the Section 52 consent from Dublin Corporation dated the 22/3/00 should be included as a condition of the licence. The Technical Committee notes that the objection specifies a payment of £17.56 per cubic metre of trade effluent discharged. However, the Section 52 consent specifies a figure of 17.56 pence per cubic metre. This charge of 17.56 pence is the correct charge as confirmed by phone with Dublin Corporation on the 1st August 2001.

The Technical Committee notes that Table D.6.1 of the PD lists the sewer monitoring parameters and frequency generally as recommended by Dublin Corporation in the Section 52 consent. The only amendment required to Table D.6.1 is to specify that monitoring for COD, suspended solids, ammonium nitrogen, sulphates and pH should be based on composite samples, and also that the flow monitoring frequency should be continuous on discharge.

The conditions proposed by Dublin Corporation in the Section 52 consent have been included in the PD (for example Conditions 6.5.1 to 6.5.13, 8.1 and 8.9). Dublin Corporation in the Section 52 consent also lists some general conditions, which they request be included in the PD. Some amendments to the PD are recommended as detailed below to ensure that the wording of related conditions in the PD, follows the wording of the conditions recommended by the Corporation. Condition 6.5.13 of the PD also needs to be amended to reflect fully the interpretation proposed by Dublin Corporation.

Recommendation:

Amend Condition 6.5.13 as follows;

6.5.13 Emission limits values for emissions to sewer in this licence shall be interpreted in the following way: -

a) Continuous Monitoring.

No flow value shall exceed the specified limit.

b) Non-Continuous Monitoring.

No pH value shall deviate from the specified rate.

No temperature value shall exceed the emission limit value.

For parameters other than pH, temperature and flow, eight out of ten consecutive results, calculated as daily mean concentration or mass emission values on the basis of flow proportional composite sampling, shall not exceed the emission limit value. No individual result similarly calculated shall exceed 1.2 times the emission limit value.

For parameters other than pH, temperature and flow, no grab sample value shall exceed 1.2 times the emission limit value.

Add the following Condition;

12.3 Sanitary Authority Charges

12.3.1 The Sanitary Authority charge of 17.56 pence (22.29 Cent) per cubic metre of trade effluent discharged shall be paid to the Sanitary Authority directly on a yearly basis. The licensee shall also defray annual monitoring costs of £2,600 (€3,301) incurred by the Sanitary Authority. Sanitary Authority charges will increase from time to time in response to increased costs in providing drainage and monitoring.

Amend Table D.6.1 below as follows; the recommended changes are shown in bold.

Table D.6.1 Sewer Monitoring - Parameters /Frequency

Parameter	Monitoring Frequency	Analysis Method/Technique ^{Note 1}
Flow	Continuous On Discharge	Flow meter / recorder
Biochemical Oxygen Demand	Weekly	Composite. Standard Method ^{Note 2}
Chemical Oxygen Demand	Weekly	Composite. Standard Method ^{Note 2}

Ammoniacal Nitrogen	Weekly	Composite. Standard Method ^{Note 2}
Suspended Solids	Weekly	Composite. Gravimetric
Sulphates	Weekly	Composite. Standard Method ^{Note 2}
pH	Weekly	Composite pH meter/recorder
Temperature	Weekly	Grab
PAH's (Total of 10)	Weekly	Composite
Mineral Oils	Weekly	Composite
Volatile Organics Oils	Weekly	Composite
Total Phenols	Weekly	Composite
Total Cyanides (as CN)	Weekly	Composite
Thiocyanates (as SCN)	Weekly	Composite
Arsenic (mg/l As)	Weekly	Composite
Cadmium (mg/l Cd)	Weekly	Composite
Chromium (mg/l Cr)	Weekly	Composite
Lead (mg/l Pb)	Weekly	Composite
Mercury (mg/l Hg)	Weekly	Composite
Copper (as Cu)	Weekly	Composite
Nickel (as Ni)	Weekly	Composite
Zinc (as Zn)	Weekly	Composite
Boron (as B)	Weekly	Composite
Iron (as Fe)	Weekly	Composite
Toxicity Units (as T.U.)	Fortnightly	Grab

Note 1: Or an equivalent method acceptable to the Agency.

Note 2: "Standards Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 19th Ed. 1995, American Public Health Association, 1015 Fifteenth Street, N.W., Washington DC 20005, USA".



Signed: _____
Brendan Wall
Technical Committee Chairperson