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19 March 2008

D0034-01

re. Notice in accordance with Regulation 18(3)(b) of the Waste Water Discharge (Authorisation) Regulations 2007

Dear Mr. Ryan,

I am to refer to the above referenced application for a waste water discharge licence relating to the Ringsend agglomeration. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Regulation 16 of the Waste Water Discharge (Authorisation) Regulations 2007.

You are therefore requested, in accordance with Regulation 18(3)(b) of the regulations, to take the following steps to supply the information detailed below:

ARTICLE 16 COMPLIANCE REQUIREMENTS

Section A:

- (i) Update the non-technical summary to reflect the information provided in response to this notice.
- (ii) Provide the name of the agglomeration to which this Waste Water Discharge Licence application relates.

Section B:

Section B –Dublin City Council

(1) Section B.5

Provide an electronic copy of the GSDSDS stormwater overflow map on which all storm water overflow locations are clearly legible.

(2) Section B.9

Compare census/household survey data for the agglomeration with the calculated population equivalent based on influent monitoring. Based on this, provide an estimate of, and comment on, the extent of leakage in the agglomeration.

Section B – South Dublin County Council

(1) Section B.5

- (i) For SDCCPS07b, the application states that this discharge is to cease in 2008, clarify whether the pumping station is to close or alternative measures proposed and clarify the date of cessation/decommissioning of the discharge.
- (ii) For SDCCPS10a, clarify the type of discharge (e.g. an emergency discharge from the pump station, a discharge direct from a foul sewer caused by insufficient capacity, a storm water overflow, etc.).
- (iii) For SDCCSWO03, provide confirmation that this overflow has been decommissioned.
- (iv) For SDCCSWO04, 05a, 05b, 08, 11 and 12, provide the dates for decommissioning of these overflows/cessation of discharges.

(2) Attachment B.5

Provide hardcopies of maps of the stormwater overflow points associated with the waste water works.

(3) Section B.10

Provide a full response to Section B.10, attaching the appropriate sections of any relevant documents referred to in the response.

Section B – Dun Laoghaire Rathdown County Council

Attachment B.5

- (i) For discharges labelled as DLRCC/B4/R, clarify the type of discharge (e.g. emergency overflow from pumping station).
- (ii) State the agglomeration in which the overflow labelled as DLRCC/B5/S is located.

Section B – Meath County Council

Complete section B.10 of the application form.

Section C:

Section C –Dublin City Council

- (i) Provide details of the following:
 - number of duty and standby pumps at each pumping station;
 - the measures taken in the event of power failure;
 - details of storage capacity at each pump station.
- (ii) Provide information on any landfill leachate introduced to the treatment works and indicate the point of entry of the leachate into the works.



Section C – South Dublin County Council

Provide details of the following:

- number of duty and standby pumps at each pumping station;
- the measures taken in the event of power failure;
- details of storage capacity at each pump station;
- design criteria and construction for each storm water overflow, where available.

Section C – Fingal County Council

Provide details of the following:

- number of duty and standby pumps at each pumping station;
- the measures taken in the event of power failure;
- details of storage capacity at each pump station;
- design criteria and construction for each storm water overflow, where available;
- any further information available on secondary discharges.

Section C – Dun Laoghaire Rathdown County Council

Provide details of the following:

- number of duty and standby pumps at each pumping station;
- the measures taken in the event of power failure;
- details of storage capacity at each pump station;
- design criteria and construction for each storm water overflow, where available.

Section C – Meath

Provide details of the following:

- number of duty and standby pumps at each pumping station;
- the measures taken in the event of power failure;
- details of storage capacity at each pump station.

Section D:

Section D –Dublin City Council

- (i) Provide a single list of all discharges from the entire agglomeration. This list shall contain the original code assigned to each discharge in the application and (where necessary) a new code, assigned using the naming convention specified in Section D of the Waste Water Discharge Licensing Application Guidance Notes. The codes shall be consistent across all the Water Service Authorities. The discharges shall be grouped as follows:
 - Primary discharge
 - Secondary discharges
 - Pump station/emergency overflows
 - Storm water overflows.
- (ii) Carry out further analysis of the primary discharge in order to complete Table D.1(i)(c) for all parameters listed and submit the completed table.



Section E:

Section E –Dublin City Council

- (i) Provide details of any further studies carried out on storm water overflows in the agglomeration.
- (ii) Clarify the reasons for stating that all storm water overflows, listed in “DCC Table E1_2.xls” of the application, comply with the definition of storm water overflow.
- (iii) Complete Table E.3 for river monitoring points and bathing water monitoring points referred to in Attachment E.2.

Section E – South Dublin County Council

- (i) Clarify whether all pump station overflows are operated in emergency circumstances only or under any other circumstances.
- (ii) Provide an explanation for the frequency of discharge at SDCCPS9a and 10a and any mitigation measures proposed.
- (iii) Complete Sections E.2 and E.3 for Phosphorous Regulations, Dangerous Substances Regulations and Water Framework Directive monitoring.

Section E – Fingal County Council

- (i) Provide an explanation for the frequency of discharge at Fingal-SW26 and Fingal-SW43.
- (ii) Provide Grid References for monitoring points 463-40, 459-30 and 459-80

Section E – Dun Laoghaire Rathdown County Council

- (i) Clarify whether all pump station overflows (DLRCC/B4/R) are operated in emergency circumstances only or under any other circumstances.
- (ii) For DLRCC/B4/R/001D, provide details of overflow frequency.
- (iii) For DLRCC/B4/R/005DL and DS, provide an explanation for the frequency of discharge.

Section F:

Section F –Dublin City Council

(1) Primary discharge

- (i) Provide a summary of the most up-to-date monitoring data available under the Dublin Bay Water Quality Monitoring Programme. Your response shall include an interpretation of the results, comparison with all relevant quality standards (*inter alia*, the Dangerous Substances Regulations) and with the objectives set under the Dublin Bay Water Quality Management Plan, and conclusions. The Dublin Bay Project Dublin Bay Water Quality Monitoring Programme Fifth and final report shall be submitted in support of your response, if available.



- (ii) Provide summary details of the most up-to-date discharge modelling available. Your response shall include, as a minimum, details of scenarios where the discharge mixes and does not mix with the cooling water from ESB Poolbeg generating station, details of the limitations of the modelling exercise, discussion of the impact of the discharge and comparison with relevant quality standards, and any relevant drawings. The modelling report shall be submitted in support of your response.
 - (iii) Provide a discussion and an assessment of the impact of the cessation of the EBS Poolbeg generating station cooling water discharge on the dispersion characteristics and the environmental impact of the primary discharge.
 - (iv) Provide an assessment of the impact of the discharge from the Ringsend treatment plant on completion of the extension works referred to in Attachment G of the application. State the population equivalent used in carrying out this assessment. Provide an estimate of the anticipated mass loadings of the parameters (see Tables D.1(i)(b) and (c) for relevant parameters) to be discharged. State whether planning and an EIS are required for the development.
 - (v) Identify all relevant conservation sites (SPAs, SACs), supply the site synopsis and submit a reasoned explanation for why it is considered that no significant impact is caused on these sites by emissions from the agglomeration, supporting your response with details of correspondence with the National Parks and Wildlife Service, where possible.
- (2) *Storm Water Overflows*
- (i) Provide an assessment of the impact of discharges from SW2.
 - (ii) Provide an assessment of the impact of storm water overflows in the agglomeration with reference to any available receiving water monitoring data and any other relevant data available. Identify any storm water overflows that may be causing surface water quality problems and/or that are known to discharge in dry weather.

Section F –South Dublin County Council

Provide an assessment of the impact of storm water overflows in the agglomeration with reference to any available receiving water monitoring data and any other relevant data available. Identify any storm water overflows that may be causing surface water quality problems.

Section F –Fingal County Council

Provide an assessment of the impact of storm water overflows in the agglomeration with reference to any available receiving water monitoring data and any other relevant data available. Identify any storm water overflows that may be causing surface water quality problems.

Section F –Dun Laoghaire Rathdown County Council

Provide an assessment of the impact of storm water overflows in the agglomeration with reference to any available receiving water monitoring data and any other relevant data available. Identify any storm water overflows that may be causing surface water quality problems.

Section G:

Section G –Dublin City Council

(1) Section G.1

Provide a full response to Section G.1, addressing each listed Directive separately. In particular, in relation to the Urban Waste Water Treatment Directive, provide details of how it is proposed to comply with the discharge concentration limit values specified in S.I. No. 254 of 2001 and S.I. No. 440 of 2004 by the prescribed dates. Your response shall include, as a minimum:

- consideration of known causes of increases in the population equivalent requiring treatment at the Ringsend treatment plant (e.g. the connection of secondary discharges from Fingal County Council in 2009 and 2011, sewer upgrades, any works to be carried out on storm water overflows, planned developments in the agglomeration, etc.);
- details of the measures or works to be carried out at the treatment plant;
- details of measures to be taken to mitigate the impact of the proposed cessation of the ESB Poolbeg generating station cooling water discharge;
- a detailed timetable for compliance with the requirements of the regulations; and
- the sources of funding for each required improvement.

(2) Section G.2

Provide a full response to Section G.2. Your response may include references to the Phosphorous Measures Implementation Reports submitted as attachments to the application.

(3) Section G.3

Provide a full response to Section G.3. Your response shall include details of how each proposed improvement is intended to ensure that discharges from the agglomeration do not cause environmental pollution, with reference to relevant legislation and standards and shall also address any areas not specifically covered in the other parts of Section G.

(4) Section G.4

Provide a full response to Section G.4. Your response shall include details of which storm water overflows (give the appropriate code) each proposed improvement is expected to bring into compliance with the definition of storm water overflow as per Regulation 3 of S.I. 684 of 2007.

(5) Section G – General

Provide completion dates for each improvement listed in the submitted programmes of improvements.



Section G –South Dublin County Council

Provide a full response to Section G of the application form. Separate answers for each of Section G.1, G.2, G.3 and G.4 are required. Your response shall give details of the improvements proposed for the South Dublin portion of the Ringsend agglomeration only. Your response shall specifically give details of the following:

- the improvement planned;
- the specific discharge(s) it will affect;
- the completion date;
- the source of funding; and
- a description and quantification of the expected improvements with respect to relevant standards and legislation.

Section G –Fingal County Council

Provide a full response to Section G of the application form. Separate answers for each of Section G.1, G.2, G.3 and G.4 are required. Your response shall give details of the improvements proposed for the Fingal portion of the Ringsend agglomeration only. Your response may make reference to the reports submitted as part of the original application but shall specifically give details of the following:

- the improvement planned;
- the specific discharge(s) it will affect;
- the completion date;
- the source of funding; and
- a description and quantification of the expected improvements with respect to relevant standards and legislation.

Section G –Dun Laoghaire Rathdown County Council

For each planned improvement listed in Attachment G of the application, provide details of the following:

- the specific discharge(s) it will affect;
- the completion date;
- the source of funding; and
- a description and quantification of the expected improvements with respect to relevant standards and legislation.

Section I:

Provide a completed version of Section I of the application form. The joint declaration must be signed by a representative of each of the five co-applicants to this application.



Electronic format of information:

The following information was received in hard copy by the Agency on 14th December 2007 but was not received on CD-ROM as required. You are required to submit the following sections in electronic format (see Section 2.2.4 of Waste Water Discharge Licensing Application Guidance Notes):

- For South Dublin, Fingal, Dun Laoghaire Rathdown – Sections E, F and G.
- For Dublin City – Tables F.1 from original application in electronic format.



In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply the information in the form of one original plus one copy within **10 weeks** of the date of this notice. In addition, please submit one copy of the requested information in electronic searchable PDF format on a CD-ROM to the Agency. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **D0034-01**. Please direct all correspondence in relation to this matter to *Administration, Environmental Licensing Programme, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, County Wexford*, quoting the register number.

Yours sincerely,



Emer Cooney
Inspector
Office of Climate, Licensing & Resource Use