

Fingal County Council Comhairle Contae Fhine Gall

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Rec'd From: Fingal Co. Co.

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WATER SERVICES DEPARTMENT

Grove Road, Blanchardstown

3 March 2008

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**Re: EPA Proposed Decision W0231-01, Fingal Landfill,
Nevitt, Lusk, County Dublin.
Local Authority Consent for Discharge to Sewer.**

Further to our letter of 7 February 2007, concerning the application for a discharge consent for the proposed Landfill, and the Proposed Decision of the Agency, the Water Services Authority wishes to revise the Emission Limit Values for Zinc and Chloride to 10.0 mg/l and 5,000 mg/l respectively.

The ELV's in the Standard Template (issued to us by the EPA) are based on Daily Mean Concentrations (mg/l) and Daily Mean Loadings (Kg/day). In the Proposed Decision issued by the Agency, these values were stated as Maximum Values; compliance to be determined as Grab Samples.

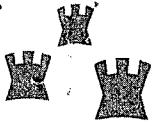
Accordingly, we have revised the ELV's to be more appropriate to the Maximum Values, rather than the Mean Values. For more detail, see the attached letter from the Central Laboratory, Dublin City Council.

R. J. Spain

L. J. Spain
Senior Engineer
Water & Drainage Operations

*Water is precious. Let's conserve it.
Tá uisce luachmhar. Caomhnáimís é.*





Dublin City Council

Comhairle Cathrach Bhaile Átha Cliath

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Mr. Peter O'Reilly,
Senior Engineer,
Water Services Department,
Fingal County Council,
Blanchardstown Office.

Received 3/3/08
L. J. Egan

03.03.2008

Attention : Mr. David Devine, A/Senior Executive Engineer.

Re : EPA Proposed Decision **W0231-01**, Fingal Landfill, Nevitt, Lusk, County Dublin – Local Authority Consent for Discharge to Sewer.

Chemical and monitoring conditions for a Section 52 consent were prepared in Central Laboratory at the request of the Water Services Department of Fingal County Council on 31/07/07. They were prepared using a standard template issued by the EPA for Section 52 consents.

No sewer had yet connected the Nevitt site to Lusk village. The intended receiving Wastewater Treatment Plant was that at Portrane which is due to be upgraded.

It should be noted that the consent conditions recommended by the Central Laboratory were in the form of :

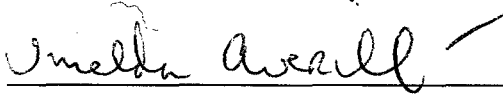
1. General consent conditions (9 number)
2. Additional general consent conditions (10 number)
3. Schedule B Emission Limit Values for BOD, COD, Suspended Solids, Sulphates, Oils Fats and Greases, pH and Temperature expressed as both a Daily Mean concentration (mg/l) and a Daily Mean Loading (Kg/day). 15 additional parameters were also included expressed as a Daily Mean concentration (mg/l) and a Daily Mean loading (Kg/day) .
4. Schedule C Emission Monitoring conditions for the regulated parameters specifying both monitoring frequency and sampling methodology. The sampling methodology specified was 24-hour composite sampling for all chemical parameters excluding mineral oils and methane gas. This allows a smoothing of concentration spikes that may occur at particular times during the 24-hour period.

The Proposed Decision issued on 20/09/2007 by the EPA includes the Fingal consent Emission Limit Values (Daily Mean Concentration) in Schedule B.3. expressed as maximum concentrations.

Schedule C.3.2. of the Proposed Decision specifies monitoring of Emissions to Sewer as **grab samples** rather than the **composite samples specified in the Fingal County Council consent recommended to the EPA.**

This may result in difficulties in compliance with the proposed emission limits, particularly in the case of the parameters Zinc and Chloride.

It is therefore requested that the emission limit value for Zinc be increased to 10.0 mg/l (as Zn) and that the emission limit value for Chloride be increased to 5,000 mg/l (as Cl-).



Imelda Averill,
Senior Executive Scientific Officer.



Denis Morrissey,
Senior Scientific Officer.

c.c. Mr. John Daly, Senior Engineer, Waste Infrastructure and Enforcement.
Mr. Lar Spain, Senior Engineer, Water Services Department.

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