

**Joe Reilly**

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**From:** Marian Doyle  
**Sent:** 04 February 2009 14:51  
**To:** Joe Reilly  
**Subject:** FW: Commissioning of Waterford City WWTP in advance of Waste Licence

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**From:** Ray Mannix [mailto:rmannix@waterfordcity.ie]  
**Sent:** 26 January 2009 15:11  
**To:** Marian Doyle  
**Cc:** Brewitt, Simon G; Barrett, Jimmy; Paul Tooher; Michael Adam; Colette Byrne  
**Subject:** Commissioning of Waterford City WWTP in advance of Waste Licence

Marian,

As you are probably aware Waterford City Council submitted an objection to the proposed Waste Licence on Monday 19<sup>th</sup> January.

Our new WWTP is being procured under a Design, Build and Operate contract in accordance with DOEHLG policy.

Our contractor is very contractual and raises issues which in his thinking might prevent or delay him from commissioning the plant, resulting in a claim by the contractor for substantial additional costs from Waterford City Council and the DOEHLG.

You assisted me previously when the contractor would not start commissioning without authorisation from the EPA to allow discharge from the Works without a Discharge Licence being in place.

The contractor has now raised the question as to whether he can proceed with commissioning in advance of the Waste Licence being in place. At a meeting held with yourself and Jonathan Derham on 12/10/07 it was stated by Jonathan that "the absence of a Waste Licence would not prevent commissioning of the plant. The waste licence would be triggered by the waste disposal activity." If you can confirm by letter (and email) that this is the case it would clarify the matter and avoid any possible delay in commissioning the plant.

Also, it is our understanding the Waste Licence is for the biological treatment of sewage sludge and the recycling or reclamation of organic substances. There are screens and grit traps on the incoming flow which remove screenings and grit. These are transferred to a skip and periodically disposed of at a licenced landfill. Can you confirm that the disposal of these screenings and grit is not part of the licenced activity and as such would not activate the waste licence.

Give me a ring if you require any clarification.

Regards,

**Ray Mannix**, Senior Engineer,  
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 Waterford City Council.  
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04/02/2009