



Shannon Environmental Services Ltd.

WASTE CHEMICAL TREATMENT AND DISPOSAL
FULLY LICENCED.

Smithstown Industrial Estate, Shannon, Co. Clare.

Telephone (061) 362699 / 362087 / 362701. Fax No. (061) 363253.

**Administration,
Waste Management Licencing,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
County Wexford.**

Attention of:- **Mr Brian Meaney.**

REFERENCE APPLICATION W041-1.

Dear Sir :

We wish to inform you of our recent discussions with Shannon Development and Clare County Council regarding the discharge parameter limits to the Shannon Development foul Sewer. The meeting was initiated to discuss the immediate and longer term issues associated with the change in effluent parameter limits, which commence in September, but all parties rapidly realised that the critical path item was to seek a rapid resolution to the on-going negotiations between Clare County Council and Shannon Development regarding the take-over of the Effluent Treatment Plant at Tradaree by Clare County Council.

One critical issue in this matter is a speedy resolution to the licencing of the SFADCO facility by EPA and some clarification as to the application of the effluent related aspects of the waste licence when the facility is taken over by Clare Co.Co.

Ultimately, all parties recognised that a final allocation of capacity cannot be negotiated until the handover and licencing issues are resolved and the necessary restructuring and reinvestment in the treatment plant is sanctioned by DoE.

In the interim this poses significant difficulties for SES Ltd. in developing the business and implementing reinvestment in the on site treatment facilities.

The company have requested an increase in hydraulic and organic capacity to the sewer and have requested some changes to a wide variety of parameters . Both Clare Co.Co. and SFADCo. are understanding of the difficulties which the current situation is presenting and have described our position as being the 'meat in the sandwich' which has remained uneaten for many years.

Directors: H. Lawless, E. Storey

Reg. Office: Smithstown Industrial Estate, Shannon, Co. Clare, Ireland. Co. Reg. No.: 103644

September 10, 1994

To helpfully address the immediate problem of a reduction by 50% of allowable load in September, all parties were agreed that the following actions and sequence would be followed

- Firstly, a letter is to be issued by Clare Co.Co. to Shannon Development permitting an extension of the current discharge limits to Shannon Development for their discharge to the Shannon Estuary from the Tradaree Effluent Treatment Plant, probably for at least one year and preferably until the plant is taken over by Clare Co. Co.
- This letter will be forwarded to EPA by SFADCo. for two purposes
 - To update the licence application details
 - To advise EPA that SFADCo as the sewer undertaker agrees to SES Ltd. being permitted to discharge a specified load to the sewer which will accompany the letter.
- This intermediate step will hold until a long-term arrangement regarding the discharge limits is agreed when the take-over of the treatment plant by Clare County Council is effected.

This will, at least, permit the company to continue to operate at the current level of activity until a final resolution is reached. It still presents a difficulty in planning strategic investment in on site treatment capacity as we have no long term undertaking that the requested expansion or even the current allowances will be granted and /or when the matters will be finalised.

Since our strategic development has been in abeyance for some considerable period already due to the combination of the matter in hand and licencing, it seems particularly unjust and unreasonable that the company's position is further exposed due to statutory machinations beyond its control or influence.

In light of this current position we would strongly contend that implementing condition 7.4.6 within the originally anticipated time frame is not just or reasonable especially since no issue was taken by the company's submission that no adverse environmental impact is or has occurred.

The company have been exploring a wide range of technology options for the development of the aqueous treatment aspects of the business. However, such investment in treatment plant upgrades cannot take place until such time as the long-term discharge arrangements can be determined..

A further issue is that the capabilities of the Tradaree plant may be significantly enhanced and therefore the relative balance of what treatment is appropriate onsite at SES Ltd. versus the offsite BATNEEC/BAT capability for both organics and inorganics will almost certainly change.

September 10, 1994

The company have been proactive in trying to resolve this matter over many years and also wish to acknowledge the sympathetic view taken by both Clare Co.Co. and SFADCo., it is frustrating that having received the waste licence after a lengthy process we are still unable to proceed .

Please contact me if you require any clarification of the above.

Sincerely,


Philippa King

Tech & Env. Manager.

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