

Ms Patricia Power  
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21 August 2009

D0136-01

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

Dear Ms Power,

I am to refer to the above referenced application for a waste water discharge licence relating to agglomeration named Bandon. 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 steps to supply the information detailed below:

## **REGULATION 16 COMPLIANCE REQUIREMENTS**

### **Waste Water Works**

- c) Provide a diagram and technical description of the design criteria and construction detail of the primary discharge outfall.

In addition provide the following information:

- (i) An estimate of the existing and the maximum proposed Population Equivalent (p.e.) contribution from (1) domestic, (2) commercial and (3) trade effluent sources.
- (ii) Clarification whether leachate and/or industrial sludges are treated in the wastewater treatment plant (WWTP). If so provide details of (1) the transfer and storage arrangements, (2) the location in the WWTP where the leachate/industrial sludge residues are introduced and (3) the quantity (volume and p.e), frequency and rate of the addition to the WWTP.
- (iii) Summary details of all industrial discharges permitted under an IPPC, Waste or single media licence, for treatment in the WWTP and of any other wastewaters or wastes accepted at the WWTP for treatment.
- (iv) Clarify the proportion of the waste water from the agglomeration that passes via the Glaslinn Road Pumping Station and the proportion of the waste water passing via



this pumping station that undergoes preliminary treatment. Clarify how often the storm water overflow at this pumping station activates (provide frequency/volume, if available).

### **Existing Environment**

- (f) Provide a further description of the existing environment in terms of water quality with particular reference to environmental quality standards or other legislative standards. The response should include:
- (i) A copy of the most recent water quality management and/or catchment plan in place for the receiving water body. Provide an evaluation of the discharge in relation to the objectives of the water quality management plan and catchment plan, as applicable.
  - (ii) The levels of dilution available in the receiving water body, and the estimated volumetric contribution of the WWTP discharge to dry weather flow of the receiving water.
  - (iii) Provide details of any correspondence engaged in with the National Parks and Wildlife Service in relation to a determination as to the likelihood of discharges from the waste water works having a significant effect on a European site. If the discharges are deemed likely to have a significant effect, an appropriate assessment of the implications for the designated site in view of the site's conservation objectives must be carried out. Any assessment, should it be deemed necessary, shall be submitted as part of a reasoned response to this notice.
  - (iv) Clarify the difference in the dry weather flow and 95%ile flow for River Bandon included for SW1 to SW4 (inclusive) and SW6 to SW10 (inclusive). Clarify that the 95%ile and DWF for River Bridewell is correct.
  - (v) Complete table D.2 of the licence application form - *Tabular Data on Discharge Points*.
  - (vi) Complete the Tabular Data on Drinking Water Abstraction Point(s), Section F.2 of the application, in relation to the Innishannon abstraction point.

### **Laboratory Monitoring and Analysis**

- (g) Provide additional information in relation to monitoring, sampling and analysis. The response should include:
- (i) Complete Section E.2 of the licence application form.
  - (ii) Clarify the laboratory, method used and limit of detection for analysis of lead, zinc, cadmium and mercury and its compounds.
  - (iii) Clarify if the composite sampling of the primary discharge is time or flow proportional.
  - (iv) Clarify the sampling arrangements for the influent waste water to the WWTP and provide details of the proposal and timescale for the provision of composite sampling and continuous flow monitoring, as applicable.
  - (v) Provide details of the proposal and timescale for continuous flow monitoring on the discharges from the waste water works, as applicable.

### **Operational Information**

- (i) Reassess the details submitted in the application to ensure that it fully describes the existing or proposed measures, including emergency procedures, to prevent unintended waste water discharges and to minimise the impact on the environment of any such discharges. The response should include:

- (i) Information on all of the storm water overflows that may also act as emergency overflow points. Describe the events that may lead to an emergency overflow at each location.
- (ii) An assessment of the identified storm water overflows having regard to the requirements of the DoEHLG guidance.
- (iii) Clarification as to whether the emergency overflow from any pumping stations has been known to activate in the last 12 months. If so, identify each pumping station and provide the reason for the activation and details of the frequency, duration and discharge volume (or estimate), where applicable.
- (iv) Clarification if there is a standby or mobile generator at any of the pumping stations. Clarify the measures taken in the event of power failure at the WWTP or pumping station.
- (v) Provide a copy of the preliminary assessment report into the options available for the upgrading of the current treatment plant and sewerage network.
- (vi) Clarify the treatment regime proposed to ensure compliance with the relevant orthophosphate environmental quality standard and the phosphorus and orthophosphate discharge concentration following the upgrade of the waste water works.
- (vii) Submit details of all discharges from the Bandon agglomeration via the following web based link: [http://78.137.160.73/epa\\_wwd\\_licensing/](http://78.137.160.73/epa_wwd_licensing/)
- (viii) In relation to WWTP and pumping stations, clarify the measures taken in the event of a power failure.
- (ix) Identify which discharge points that relate to stormwater/emergency overflow from pumping stations and provide a schematic diagram of each pumping stations.

#### **Assessment of Impacts of Waste Water Discharges on Receiving Waters**

- (k) Reassess the effects of any existing or proposed discharge on the environment, including any environmental medium other than that into which the discharge take place or are to take place, and of proposed measures to prevent or eliminate, or where that is not practicable, to limit or abate any pollution caused by such discharges. The response should include:
  - (i) Confirmation that all assessments of the impact of waste water discharges are based on the treatment of the **maximum** proposed p.e., to be served by the waste water treatment works. Submit additional or revised assessments where applicable. Comparison of results with the values included in the European Communities Environmental Objectives (Surface Waters) Regulations, 2009. S.I. No. 272/2009.
  - (ii) An ecological assessment of the predicted impact of the discharges from the agglomeration on sensitive species (such as Margaritifera Margaritifera - Freshwater Pearl Mussel) that may be present in the receiving water downstream of the discharges.

#### **Abstraction Points**

- (j) Provide a summary of the intake monitoring results for the abstraction at the Innishannon Water Treatment Plant and assess compliance with the relevant drinking water category (S.I. 294/1989 - Quality of Surface Water Intended for the Abstraction of Drinking Water Regulations). Reassess any potential risks to the water quality at the downstream abstraction point due to discharges from the waste water works.

### Further Works

- (m) Provide further details of any work necessary to meet relevant effluent discharge standards and a timeframe and schedule for such works. The response should include:
- (i) Clarification of the scope of the proposed works to be carried out in the Bandon agglomeration under the 2007 - 2009 Water Services Investment Programme funding and provide the proposed start date and completion date of the various works to be carried out, as applicable.
  - (ii) Details of the programme of improvements to ensure that discharges other than the primary and secondary discharges comply with the DoEHLG guidance on Storm Water Overflows. Include the proposed timeframe for compliance with the DoEHLG guidance.
  - (iii) Identify the proposed measures to be implemented to assist in the achievement of the requirements under the European Communities Environmental Objectives (Surface Waters) Regulations, 2009. S.I. No. 272/2009.
  - (iv) Include a copy of any approved funding agreed under the WSIP and the time frame for completion of any proposed works.

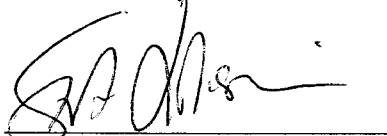
Your reply to this notice should include a revised non-technical summary which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

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 a one original plus one copy within **six** weeks of the date of this notice, i.e. by **5th October 2009**. In addition please submit one copy of the requested information in electronic searchable PDF format on a CD-ROM (no file to exceed 10MB) to the Agency. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is **D0136-01**. Please direct all correspondence in relation to this matter to *Administration, Environmental Licensing Programme, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



**Stuart Huskisson**

**Inspector**

**Office of Climate, Licensing & Resource Use**