



This report has been cleared for submission to the Director by Senior Inspector Leo Sweeney
Signed Maifay Date 04/02/2014

LI

Licensing Programme Memorandum

To:	Dara Lynott
FROM:	Leo Sweeney
DATE:	4 th February 2014
RE:	Request for a Technical Amendment to Waste Water Discharge Licence Register Number D0202-01 , for Mitchelstown agglomeration.

Background:

Cork County Council was first granted a Waste Water Discharge Licence for the Mitchelstown agglomeration by the Environmental Protection Agency on the 5th of July 2010, bearing Register. No. D0202-01.

The primary discharge (SW01) of treated waste water from the agglomeration is to the River Funshion (receiving water). The primary discharge is combined with the licensed discharges from Dairygold (IPPC Reg. No.P0404-02). Mitchelstown WWTP contributes 1/8th (1,620 m³/day) of the total volume of waste water discharged by the primary discharge.

In a letter to the Agency dated the 2nd of June 2011, Cork County Council requested a technical amendment to this licence, (Reg. No. D0202-01) in accordance with section 33(1) of the *Waste Water Discharge Authorisation Regulations, 2007*.

Part (a) of the request deals with the location of the monitoring point which in accordance with the provisions of condition 4.3 will be dealt with by the Office of Environmental Enforcement (OEE).

Condition 4.3 states:

The licensee, shall within 12 months of the date of grant of this licence, identify a suitable monitoring location for the primary discharge SW1-MITC and install flow proportional composite sampling equipment as agreed by the Agency.

OEE have been advised of the request.

Requested Amendment:

Part (b) of the request relates to Schedule A.1 where Cork County Council requests an amendment to the Emission Limit Values (ELV) for the combined discharge to revert to those set on the discharge from the municipal wastewater treatment plant (WWTP) under condition 3.2 of the licence, when there is no discharge from the IPPC installation.

Condition 3.2 states:

No specified discharge from the Municipal WWTP in the agglomeration shall exceed the limits set out in Part 1 of the Second Schedule of the Urban Waste Water Regulations, 2001 as amended, subject to the requirements of Condition 2 above.

Assessment:

The proposed technical amendment request is not within the remit of section 33(1)(b) of the *Waste Water Discharge Authorisation Regulations, 2007*, as amended. Although the cessation of the IPPC discharge may reasonably be regarded as having been contemplated by the terms of condition 3.2, the necessary amendments to emission limit values for the primary discharge was not expressly provided for under Schedule A.1 *Primary Waste Water Discharge*.

Emission limit values need to be revised for ammonia and orthophosphate at the point of discharge from the WWTP to ensure compliance with the requirements of the *Surface Water Regulations S.I. No. 272 of 2009*. Accordingly, the requested amendments will require a licence review.

Recommendation:

I recommend that the licence amendment be rejected and Irish Water advised of the requirement to apply for a licence review in accordance with the provisions of the *Waste Water Discharge Authorisation Regulations, 2007*, as amended.



Signed: _____

Leo Sweeney.
Inspector, OCLR