

Annual Environmental Report 2013

Licence Registration No. P0 175-02

Issued by: Date: 08.05.2014

Quality/Environmental Manager

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1.0 Introduction

This document is the 14th Annual Environmental Report (AER) covering environmental performance at the Queally Pig Slaughtering Ltd facility.

1.1 Site details

Licence Register Number	P0 175-02			
Name of site	Queally Pig Slaughtering T/A Dawn Pork and Bacon			
Class of activity	7.4.1 Operation of a slaughterhouse with a carcass production			
	greater than 50 tonnes per day			
RBME risk category	B3			
National Grid Reference (6E, 6N)	656853, 614430			
Site Location	The facility at Grannagh is located on a site of approximately			
	30 acres on the main Waterford to Limerick road,			
	approximately 4 miles outside Waterford City. The River Suir			
	is located to the east of the plant and runs into Waterford			
	Harbour.			

1.2 Summary data table

IPPC licence annual reporting requires the submission of a completed PRTR (pollution release and waste transfer register) database. The information provided in the PRTR is related to the amount of pollutant releases to air, water and wastewater as well as off site transfers of waste. The PRTR recently submitted electronically to the EPA can be viewed in Attachment 3.

1.3 Company Profile

Queally Pig Slaughtering Ltd T/A Dawn Pork & Bacon has its origins within the Queally Group. Part of the Group's original activities included the production of live pigs and in 1986 it was decided by the Group to introduce a natural flow to the Group's activities by slaughtering and processing its own pigs, thus maximising the Group's potential.

In view of such, a new purpose built factory was constructed at Grannagh close to Waterford City. This facility would eventually house what is now Dawn Pork & Bacon. The factory is comprised of 10,125 sq. m containing one of the most modern and technically efficient pork processing plants in Europe.

The factory has current slaughter capacity of 10,000 pigs over 39 hour working shift and the capability of fully de-boning 10,000 pigs per same shift. It has close links with the Group's farming enterprises, which currently provide the factory with 2,000 pigs per week

The current workforce including management, administrative, maintenance and production staff stands at 270 people. Markets currently being served by Dawn Pork & Bacon include mainland Europe, Japan, Korea, USA, Russia, Australia and the Irish Domestic market. The operation consists of slaughtering, primal cutting, de-boning, trimming, curing, packing and freezing. The plant is both EU and USDA approved. The plant participates in the Meat Processors Quality Assurance Scheme, the BRC Global Standard for Food Safety, Issue 6 and is registered with the Bord Bia Origin Green initiative. The Company have plans to get the EMA accredited to ISO14001 within the next 18 months.

2.0 Environmental Management System

2.1 EMS Documentation

Document	Present	Comment
Onsite EMS	V	 Includes an Environmental manual, operating manual for the effluent plant and laboratory, system procedures, internal audit system and records. Available for site inspections.
Significant Environmental aspects and associated impacts	V	Available for site inspections
Public viewing of records	V	Available for site inspections
Sustainability, environmental and energy Policy	V	Available for site inspections
Objectives and targets	V	 Available for site inspections Summary of 2013 Environmental O&T and proposed Environmental O&T included in the AER.
Environmental Management Program		 Full EMP available for site inspections Outline incorporated into O&T.
Daily/weekly/monthly monitoring results	V	Available for site inspections
External lab report for 2013 groundwater monitoring	V	Available for site inspections
Waste records	$\sqrt{}$	Available for site inspections
Training records	$\sqrt{}$	Available for site inspections
Organisational chart	V	Available for site inspections
Bund and pipeline integrity full report 2012	$\sqrt{}$	Available for site inspections
2013 Boiler efficiency report	$\sqrt{}$	Available for site inspections
ELRA/Decommissioning plan	$\sqrt{}$	Available for site inspections
Energy Audit	$\sqrt{}$	Available for site inspections
Noise Survey 2012	$\sqrt{}$	Available for site inspections
Impact on shellfish study	V	Available for site inspections

2.2 The following is a report on the progress achieved in the objectives and targets set for 2013.

- EMP 01 Monthly/quarterly surface water monitoring to ensure there is no onsite contamination. Status: Completed.
- EMP 02 Waste water effluent inspection and adjustment of operational parameters to ensure optimum efficiency of WWTP. Status: Completed.
- EMP 03 Complete groundwater analysis to ensure there is no onsite contamination to groundwater. Status: Completed.
- EMP 04 Equipment calibration to ensure all WWTP probes/meters are accurate. Status: Completed.
- EMP 05 Installation of oil separator in the new carpark. Status: Due for completion in 2014.
- EMP 06 Preparation of PRTR. Status: Completed.
- EMP 07 Investigate the use of UV treatment for final effluent to comply with condition 6.18 of IPPCL Status: Completed.
- EMP 08 Bi-annual waste sludge analysis Status: Completed.
- EMP 09 Financial investment Status: Ongoing project and investment in environmental projects.
- EMP 10 Boiler efficiency testing to ensure optimum efficiency of boilers. Status: Completed.
- EMP 11 Reduce the water usage on site Status: Completed.
- EMP 12 Undertake and energy audit Status: Completed.
- EMP 13 Conduct an assessment on the use of raw materials and identify areas for improvement to comply with condition 7.1 of IPPC Licence P0 175-02. Status: Completed.
- EMP 14 Preparation of ELRA/Decommissioning plan Status: Completed.
- EMP 15 Train employees on environmental issues. Status: Completed.
- EMP 16 Odour audit to monitor if any odours are generated from the process and eliminate them if they occur: Status: Completed.
- EMP 17 Implementation of water regulation on production lines and machinery when not is use. Status: Completed.

2.3 The following objectives and targets have been set for 2014

EMP	Target	Completion date	Responsibility	Indicator
EMP 01	Ensure underground pipelines are intact. Assessment carried out every 3 years. Last completed in 2012.	2015	Contractor	Contractor report
EMP 02	Bund integrity testing. Assessment carried out ever 3 years. Last completed in 2012.	2015	Contractor	Contractor report
EMP 03	Reduce hydraulic loading to the effluent plant. Analyse all waste streams to establish where improvements can be made.	December 2014	Environmental Manager	Report
EMP 04	Reduction in biological loading to the effluent plant. Analyse all waste streams to establish where improvements can be made.	December 2014	Environmental Manager	Report
EMP 05	Monthly/quarterly surface water monitoring to ensure there is no onsite contamination.	Ongoing	Environmental technician	Report
EMP 06	Waste contractors and transport companies – review of licenses.	Annually	Environmental Manager	Report
EMP 07	Complete groundwater analysis to ensure there is no onsite contamination to ground water.	May 2014	Environmental technician	Report
EMP 08	Equipment calibration to ensure all WWTP probes are accurate	April 2014	Contractor	Contractor report
EMP 09	Installation of oil separator in car park to minimize the potential for contamination of ground water and surface water.	September 2014	Maintenance Manager	Visual
EMP 10	Preparation of PRTR and submission to the EPA	March 2014	Environmental Manager	Report
EMP 11	Over ground pipelines – monthly inspection programme of flanges and valves etc, on over ground pipelines.	Ongoing	Environmental Manager	Report
EMP 12	Improve operational controls of our bio-filter to maximize efficiency and improve odours on site.	July 2014	Environmental Manager	Report
EMP 13	Boiler efficiency testing to ensure optimum efficiency of boilers and eliminating contaminated air emissions.	March 2014	Contractor	Contractor report
EMP 14	Conduct a noise survey	June 2014	Contractor	Contractor report
EMP 15	Reduce organic waste produced in the WWTP by improving the belt press operation i,e increase dry solids.	December 2014	Maintenance Manager	Report
EMP 16	Reduction in electricity used on site – installation of occupancy light sensors and timers, installation of LED lighting in external areas.	December 2014	Maintenance Manager	Report
EMP 17	Implement recommendations from the energy audit	July 2014	Environmental Manager	Report
EMP 18	Reduce water usage on site – closer management of the cleaning operation, installation of more efficient valves and nozzles, recycling water, improve level control system in sterilizers, trialing of different jets for wash purposes.	July 2014	Maintenance Manager	Report
EMP 19	Staff Training and awareness 1. Refresher environmental awareness training for every employee. 2. Overview of ISO 14001 for two employees. 3. EMS internal auditing training for two	December 2014 June 2014 July 2014	Environmental Manager External Trainer External Trainer	Training records

3.0 Emissions to Water Summary

Environmental monitoring data for the monitoring period January to December 2013 are summarised in the following sections. Waste from Dawn Meats Exports and Dawn Pork and Bacon are gravity fed to the waste water treatment plant. Both waste streams undergo Primary screening and then the waste is pumped through the rest of the WWTP which comprises of an activated sludge system and final clarification. Treated waste water is discharged into the River Suir.

3.1 Discharge effluent (EW1)

Parameter	Licence ELV	ELV Kg/Year	Kg/Year 2011	Kg/Year 2012	Kg/Year 2013
рН	6-9	-	-	×-	·-
Temperature	25°C	-	-	-	-
COD	100mg/l	65,700	31,607	23,924	24, 431
BOD	40mg/l	26,280	5,176	2,411	2,340
Suspended Solids	60mg/l	39,420	6,670	4355	4,406
Total N (as N)	25mg/l	16,425	-	2,133	3851
Total Ammonia (as N)	10mg/l	6,570	1,649	1643	1073
Total Phosphosous (as P)	2mg/l	1,314	165	273	266.77
Orthophosphate (PO ₄ ³⁻)	1mg/l	657	499	362	352.83
Detergents	5mg/l	3,285	242	115	111.87
Oils, fats and Grease	15mg/1	9,855	1,832	1991	1940.56
Total Emissions		169,506	47,480	37,204	38,773

Comment: Results indicate good performance against ELV. Further reductions in hydraulic and biological loading are planned for 2014. It should be noted that no individual samples taken in 2013 exceeded the licence ELV.

3.2 Surface Water (EW2)

Parameter	Unit of measurement	Monitoring frequency	2011	2012	2013
pH	Units	Monthly	2 6	-	-
Conductivity	mS/cm	Continuous	-	-	-
COD	mg/l	Monthly	17.2	21	31.9
Suspended solids	mg/l	Quarterly	3.25	6	17
Total Ammonia (as N)	mg/l	Quarterly	.52	.52	.152
Oils, fats and grease	mg/l	Quarterly	<1	<1	<1
Chloride	mg/l	Quarterly	29.7	30	32.32
Visual inspection	-	Daily	Clear	Clear	Clear

Comment: Surface water run off from roof areas and 'clean' yard areas is discharged by gravity to EW2. The surface water finally discharges into the River Suit. The results of analysis of surface water samples are similar to previous years and are within expected levels for surface water run off.

3.3 Ground Water

Parameter	Unit of measurement	Monitoring frequency	2011	2012	2013
pH	Units	Annual	-	7.16	7.3
TOC	Mg/l	Annual	-	8.3	.99
Nitrate	mg/l as N	Annual		6.85	7.14
Conductivity	uS/cm	Annual		754	1307
Phosphorous	mg/l P	Annual	0.0 <u>1</u> 20.2	0.10	<0.1
Total Nitrogen	mg/l N	Annual		6.90	7.6
Orthophosphate	mg/l P	Annual		< 0.02	< 0.02

Comment: Ground water measured parameters are consistent every year. As well as the parameters in the table the ground water is monitored on an annual basis against the parameters outlined in the 'EU Drinking Water Directive regulations'.

4.0 Waste Management

Management of solids non hazardous and hazardous waste are recorded in accordance with licence condition.

4.1 Waste removed off site for recovery

Waste category	EWC	Tonnage per year 2011	Tonnage per year 2012	Tonnage per year 2013
Organic waste from WWTP	020204	4,919.00	5,123.92	5,572.039
ABP-Blood	020202	1,934.88	2,054.30	1,858.76
ABP-Cat 2	020202	956.78	423.72	485.80
ABP-Pet food	020202	698.06	684.62	571.72
ABP-Offal	020202	3,680.57	4,514.64	4,375.02
Packaging and landfill	200101	124.60	142.16	128.28
waste				
Lamps	200121	0.166	0.18	0.17
Oil	110113	1.7	0.653	.700
Paper-shredding	200101	-	1.27	1.85
Total waste recovered/recycled		12,315	12,945.46	12,994

4.2 Waste removed off site for disposal

Waste category	EWC	Tonnage per year 2011	Tonnage per year 2012	Tonnage per year 2013
Lab waste	160506	0.052	0.092	-
Blades and knives	180202	-	0.431	.1365
Total waste disposed	30 30 to	0.052	0.523	0.1365

Note: No waste was disposed/recovered on site. Volumes of waste produced are consistent with the kill numbers. O&T for 2014 include plans to reduce the volume of organic waste produced from the WWTP.

5.0 Resource and energy management

Data relating to total energy consumption (electricity, natural gas and light fuel oil) and water are summarised in the following table.

Monitoring parameter	Unit of measurement	2011	2012	2013
Electricity	Watts	5,103,360	5,237,200	5,226,720
Water	Gallons	45,418,210	39,982,849	35,803,470
Gas	M3	245,734	265,545	210,110
Oil	Litres	193,799	29,035	14,236

Comment: Monitoring and targeting system in place for electricity/water/gas and oil used per pig processed. System will be continued to be used and developed. 120 K investment in 2012 to change our fuel source from oil to natural gas, ongoing projects to reduce and improve resource and energy management.

6.0 Monitoring and Compliance

Monitoring parameter	Date	Outcome	Comment
Unannounced EPA audit	12.11.2013	3 Observations	Observations closed out
EPA effluent collection and analysis	28.02.2013 20.06.2013	Results all within Emission Limit Values	N/A
Complaints	No complaints received in 2013	N/A	N/A
Environmental incidents	No environmental incidents in 2013	. N/A	N/A

7.0 Water conservation report

7.1 Reduction in water used on site/pig processed

Water source	2010	2011	2012	2013	Overall
	Gallons used per	Gallons used per	Gallons used per	Gallons used per	reduction 2010-
	pig processed	pig processed	pig processed	pig processed	2013
Cold water	121.42	92.81	78.11	80.07	34%
Hot water	29.53	19.76	13.30	13.83	53%
			.0		

To achieve the above reduction in water usage the following measures were implemented at the Dawn Pork and Bacon facility;

- In 2011 the use of sub metering on hot and cold water was introduced and allowed for the monitoring and targeting of hot and cold water usage per pig processed in certain areas in the plant. This data is consolidated on a central database and analysed for trends.
- In 2012 our sterilizer system was upgraded, to switch from continuously heated water at 82°C to water heated as and when required.
- Closer management and auditing of water usage on site.
- Installation of more efficient nozzles and valves on cleaning equipment.
- Recycling water from Vac pac machines into the 40C tanks.
- Improvement of level control in the sterilizers.
- Automation of manual valves.
- Employees are trained at induction and refresher training to report any water leaks that they notice to their line supervisor.
- Some treated waste water is recycled back into the treatment systems for use in other processes such as dewatering.
- By putting controls on water usage with feed back on lines so that when there is no product on the line/machines we will turn off water with electric valves, it is predicted that a further 10% reduction in water usage will be achieved 2013-2014.
- A water usage audit will be carried out this year to establish if more improvements can be made.

APPENDIX 1 Boiler Efficiency 2013 Report Summary

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Hi-Line Energy Solutions Ltd
Croughtabeg, Windgap, Callan, Co. Kilkenny.
Tel: 051 641118 Fax: 051 641122 087 2280083 Email hillineenergy@eircom.net

Service Record / Commissioning / Fault Report

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Hi-Line Energy Solutions Ltd Croughtabeg, Windgap, Callan, Co. Kilkenny. Tel: 051 641118 Fax: 051 641122 087 2280083 Email hillineenergy@eircom.net

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Service Record / Commissioning / Fault Report

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Hi-Line Energy Solutions Ltd Abilene, Monassa, Callan, Co. Kilkenny.

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Service Record / Commissioning / Fault Report

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APPENDIX 2 Energy audit 2013





Queally Pig Slaughtering Ltd. t/a Dawn Pork & Bacon

Grannagh, Co. Kilkenny, Ireland.



Energy Efficiency Audit Report, 2013

January 2014









OHSAS 18001 2007 NSAI Certified

QUALITY ISO 9001:2008 NSAI Certified



11. Audit Findings & Recommendations

The audit findings are tabulated below. In summary, eight recommendations have been made as a result of the findings.

Table 8. Audit Findings

Item	Recommendations / Observations
1	Recommendation: Energy Management:
	There has been focus on other areas of improvement at the facility which have proved successful however it is considered that Energy Management is an area that could now be focused on. An Energy Policy could be developed; • An Energy Manager could be appointed and a reporting structure set up. Consideration should be given to setting up an Energy Management Committee comprising of the maintenance manager and other key personnel who can have an effect on the facilities energy consumption. This committee could act as the main channel of communication and motivation on energy efficiency; • Objectives and Targets should be set on both a long term and short term basis for reducing energy consumption and increasing energy efficiency; • Energy Awareness should be generated throughout the
	facility. This can be carried out by sending out a monthly email on how everybody can contribute to saving energy
	 through simple measures such as turning of lights and office equipment when not in use. Energy Champions could be appointed.
2	Recommendation: Benchmarking – Total Facility Energy Load:
	For the purpose of benchmarking energy performance a baseline was developed for the total Facility annualised energy consumption. This is a quantitative reference providing a basis for comparison of energy performance. The baseline year chosen is 2005. This was chosen as the baseline year for the entire energy review process carried out. It can clearly be seen that the facility has reduced its total annualised energy consumption to 8,000,000 kWh. This is significantly lower than the initial baseline of 12,000,000 kWh.
	It is recommended that the facility consider using 2012 as a baseline going forward as 2005 no longer reflects organizational energy use and consumption. 2012 will reflect current energy trends at the facility. This would serve as a reference point in future analysis carried out on energy performance.

Item	Recommendations / Observations
3	Recommendation: Electrical Load:
3	The majority of the facility's electrical consumption is attributed directly to the refrigeration system, the compressed air system and the lighting. As there has been little change in this load since 2005 it is recommended that these systems should be targeted going forward for energy reduction. Further review of these systems could yield potential energy reduction projects.
4	Recommendation: Lighting: QPS has requested a study be done on their lighting to potentially produce a lower rating light fitting that is suitable for use at their facility. It is strongly recommended that this be pursued as there are significant savings to be made here.
	It is also recommended that LED lighting be revisited. There have been major breakthroughs in LED technology in the past few years and there are a large number of new products on the market that may be suitable.
5	Recommendation: Lighting: It is recommended that all lighting areas be reviewed for the installation of motion and daylight sensor control.
6	Recommendation: Benchmarking – Gas Consumption: It is clear that the facility has reduced its total annualised gas consumption to 2,500,000 kWh. This is significantly lower than the initial baseline of 4,200,000 kWh.
	It is recommended that QPS consider using 2012 as a baseline going forward as 2005 no longer reflects organizational energy use and consumption. 2012 will reflect current energy trends at the facility. This would serve as a reference point in future analysis carried out on energy performance.
7	Recommendation: Benchmarking – Gas Oil Consumption: It is clear that the facility has reduced its total annualised gas oil consumption to 250,000 kWh. This is significantly lower than the initial baseline of 2,500,000 kWh.
	It is recommended that the facility consider using 2012 as a baseline going forward as 2005 no longer reflects organizational energy use and consumption. 2012 will reflect current energy trends at the facility. This would serve as a reference point in future analysis carried out on energy performance.
8	Recommendation: Demand Side Management: It was identified on the day of the audit that the facility previously participated in the "Demand Side Management" scheme where a backup generator was run to provide power to the facility thus reducing the load on the mains grid. while not strictly an energy efficiency measure this measure does represent best practice energy management. It is recommended that this measure be reconsidered as there are a number of providers who deliver this scheme such as Energia or Activation Energy. These are only two of many who provide this.

12. Conclusions

It is concluded that QPS have made some modifications to the plant over the last number of years that have had a dramatic improvement on the facility's energy performance and carbon footprint.

QPS had a carbon footprint of 4,922 Tonnes CO_2 in 2003 and 3,243 Tonnes CO_2 in 2012. This represents a 35% reduction in CO_2 emissions in 10 years. This is a significant reduction in QPS's carbon footprint.

There has been focus on other areas of improvement at the facility which have proved successful however it is considered that Energy Management is an area that could now be focused on going forward. There is potential for further savings and improved energy management if the company wishes to further develop

13. References

• EPA Guidance Note on Energy Efficiency Auditing (July 2003)

OES Consulting Page 30 of 30

APPENDIX 3 PRTR 2013 submission



| PRTR# : P0175 | Facility Name : Queally Pig Slaughtering Limited | Filename : P0175_2013.xls | Return Year : 2013 |

Guidance to completing the PRTR workbook

AER Returns Workbook

Environmental Protection Agency REFERENCE YEAR 2013 1. FACILITY IDENTIFICATION Parent Company Name Queally Pig Slaughtering Limited Facility Name Queally Pig Slaughtering Limited PRTR Identification Number P0175 Licence Number P0175-02 Waste or IPPC Classes of Activity No. class_name The operation of slaughterhouses with a carcass production 7.4.1 capacity greater than 50 tonnes per day Address 1 Grannagh Address 2 Co. Kilkenny Address 3 Address 4 Waterford Country Ireland Coordinates of Location -7.16672 52.2776 River Basin District IESE NACE Code 1011 Main Economic Activity Processing and preserving of meat AER Returns Contact Name Joanne Day AER Returns Contact Email Address jday@dawnpork.com AER Returns Contact Position QA/Environmental Manager AER Returns Contact Telephone Number 051 870210 **AER Returns Contact Mobile Phone Number AER Returns Contact Fax Number Production Volume** 0.0 **Production Volume Units Number of Installations** 0 Number of Operating Hours in Year 0 **Number of Employees** 270 User Feedback/Comments Web Address 2. PRTR CLASS ACTIVITIES **Activity Number Activity Name** 8(a) Slaughterhouses 3. SOLVENTS REGULATIONS (S.I. No. 543 of 2002) Is it applicable? No Have you been granted an exemption? If applicable which activity class applies (as per Schedule 2 of the regulations)?

AER Returns Workbook

7/5/2014 13:26

Link to previous years emissions data

SECTION A : SECTOR SPECIFIC PRTR POLLUTANTS 4.1 RELEASES TO AIR

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Additional Data Requested from Landfill operators

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Link to previous years emissions data 4.2 RELEASES TO WATERS

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Page 1 of 1

4.3 RELEASES TO WASTEWATER OR SEWER

Link to previous years emissions data

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SECTION B : REMAINING POLLUTANT EMISSIONS (as required in your Licence)

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Page 1 of 1

4.4 RELEASES TO LAND

Link to previous years emissions data

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Page 1 of 1

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APPENDIX 4 Impact of Effluent Discharge on shellfish



Impact of Effluent Discharge on Shellfish

for Queally Pig Slaughtering Limited

Final

30th October 2013



6 Discussion and Conclusion

The following points can be made;

- Monitoring of shellfish in Waterford Harbour has not found significant issues regarding microbiological contamination;
- With regard to the risks of microbiological contamination in Waterford Harbour there is significant cause for concern regarding the proliferation of septic tank systems and the vulnerability of the harbour area to those systems;
- Urban wastewater systems and agricultural activities were also considered to be a significant risk;
- The Shellfish Pollution Reduction Programme (Appendix C) confirms that IPPC licensed sites are not considered to be a risk with regard to shellfish waters, mainly due to the distance of the activities from the shellfish areas, in the case of QPSL, approximately 13 km.

In conclusion there does not appear to be any evidence that discharges of treated effluent from QPSL are causing any significant negative impact on designated shellfish areas downstream. Indeed it is likely that any negative impacts on shellfish areas will be as a result of septic tank systems or urban wastewater systems.

