



**OFFICE OF ENVIRONMENTAL
SUSTAINABILITY**

ENVIRONMENTAL LICENSING PROGRAMME MEMORANDUM

TO:	Dara Lynott, Director
C.C:	Frank Clinton
FROM:	Brian Meaney - Environmental Licensing Programme
DATE:	20 June 2016
RE:	Request for a technical amendment to Industrial Emissions licence register number W0058-01 held by Starrus Eco Holdings Limited for a facility at Deepwater Quay, Sligo.

Introduction

Starrus Eco Holdings Ltd is authorised to accept up to 100,000 tonnes of household, commercial, industrial and construction and demolition waste for treatment and transfer. The facility was authorised under a waste licence granted to Waste Disposal (Sligo) Limited in July 2001. The waste licence was technically amended in April 2005 and January 2013. The licence was transferred to Greenstar Limited in June 2006 and to Starrus Eco Holdings in March 2014. The waste licence was amended on 27 November 2015 to become an Industrial Emissions licence.

Details of request for technical amendment

Technical Amendment B (16/1/2013) inserted conditions and schedules into the licence to authorise the discharge to sewer of effluent arising in the waste transfer building. The licence limits the discharge volume to 4.5m³/day.

Baled, wrapped waste is currently stored in the outdoor yard area. Runoff from this area and the adjacent civic amenity facility (within the installation boundary) currently discharges through a silt trap and oil/water separator into the adjacent Garavogue Estuary. This discharge is to cease. Construction works are to be carried out to alter the drainage arrangements to ensure that run-off from the bale storage area and the civic amenity facility is diverted to an attenuation system, including flow control, prior to discharge to sewer. The proposed change will result in a discharge of up to 6.5m³ per hour and 150.5m³ per day.

The licensee has sought authorisation for this change by way of technical amendment to the Industrial Emissions licence.

Irish Water

Irish Water's consent for the discharge to sewer was sought by the licensee and Irish Water, on 21/10/2015, consented to a temporary discharge to sewer, to expire on

31/10/2016. Prior to the expiry date, the licensee is expected to liaise with Irish Water to examine the nature of the discharge and develop an alternative plan.

The reason for this approach is as follows: Irish Water is not satisfied that the discharge to sewer of storm water with negligible levels of pollutants is appropriate. Such discharges take up hydraulic capacity in the wastewater networks and might exit wastewater treatment plants with higher pollutant levels than when they first entered the network.

Irish Water expects that the licensee will revise its plans and develop a system that separates unpolluted storm water from polluted storm water. The licensee is to engage separately with Irish Water on the matter.

Sligo agglomeration discharge licence

A licence was granted by the Agency in March 2010 for the Sligo agglomeration waste water discharge. According to the inspector's report for that licence (register number D0014-01), the waste water treatment plant was commissioned in January 2009, eliminating the discharge of untreated water into Sligo Estuary. The new plant has a design loading for a population equivalent of 50,000 and can accommodate future expansion up to 80,000. At the time the licence was granted, the loading was running at some 28,000 population equivalent.

Irish Water's AER for 2014 for the D0014-01 discharge states that final effluent from the primary discharge point was non-compliant with the emission limit values for ammonia (1/25 samples), total phosphorous (2/51 samples) and dissolved oxygen (25/25 samples). Irish Water considers the ammonia and total phosphorous exceedences to be due to shock loading. The maximum loading in 2014 was 55,946 population equivalent although the mean was 22,480. Irish Water states that it is not possible to achieve the prescribed dissolved oxygen concentration without further capital expenditure. Irish Water's assessment of ambient monitoring concludes that the discharge is not having an observable effect on receiving water quality.

Appropriate assessment

A screening for appropriate assessment was carried out and is documented in the proposed Technical Amendment and the Appropriate Assessment Screening Determination that accompanies this report.

The Appropriate Assessment Screening Determination relates to the proposal to discharge to sewer, stormwater arising in areas of the yard used for the storage of waste. As it happens, post 31/10/2016, following the licensee's engagement with Irish Water, the drainage pattern at the site might change again and a discharge of stormwater to surface water from these areas of the yard might recommence. Once the nature of that discharge (if it is to take place) is known, then a new screening for appropriate assessment will need to be carried out to assess, in view of best scientific knowledge and the conservation objectives of the relevant European sites, if the proposed activity (the nature of which will be quantified by the licensee having consulted with Irish Water), individually or in combination with other plans or projects is likely to have a significant effect on a European Site, namely the Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [site code 000627] and Cummeen Strand SPA [site code 004035] into which the new discharge will be made.

Discussion

Irish Water's insistence on limiting the sewer consent to 31/10/2016 means that, in the event that the sewer discharge is to cease and a discharge to the adjacent

harbour is to recommence, the Agency will have to revisit the conditions of the licence and its screening for appropriate assessment.

If on the other hand it is the case that the discharge to sewer is to continue beyond 31/10/2016, there will be no need to revisit the conditions of the licence and the screening for appropriate assessment. For this reason, and unlike Irish Water's consent to the licensee, the conditions and schedule in the amended licence will not be time limited.

The trigger for the Agency's re-examination of these matters (if required) will be the nature of the agreement that might emerge between the licensee and Irish Water. The new condition 7.22 of the licence requires the licensee to report to the Agency on the outcome of discussions with Irish Water.

In order to ensure that the matter is not overlooked and to avoid any inconsistency arising in the Agency's screening for appropriate assessment, a new condition 7.21 is proposed that prohibits the discharge to surface water of stormwater arising in waste storage areas at the installation.

Recommendation

I recommend that the Agency make a technical amendment of licence register number W0058-01 under Section 96(1)(c) of the EPA Acts 1992 as amended.

Signed:



Brian Meaney