


This Report has been cleared for submission to the Director by Karen Creed, Senior Inspector

Signed:  Date 27/06/17



**OFFICE OF
ENVIRONMENTAL
SUSTAINABILITY**

Environmental Licensing Programme Memorandum

To:	DARA LYNOTT – DIRECTOR
From:	Yvonne English, Inspector
Date:	27/06/2017
RE:	Technical Amendment to Wastewater Discharge Licence, D0044-01 – Carrigtwohill and Environs, for the purposes of ensuring compliance with the Urban Waste Water Treatment Regulations 2001 as amended – specifying the relevant limiting nutrient.

Background

Under Annex II of the Urban Waste Water Treatment Directive (UWWTD) (91/271/EEC) there is a requirement for EU member states to identify sensitive areas. These have been defined as ‘natural freshwater lakes, other freshwater bodies, estuaries and coastal waters which are found to be eutrophic or which in the near future may become eutrophic if protective action is not taken’.

Where sensitive areas have been identified there is a requirement for urban waste water to be subjected to more stringent treatment for agglomerations of over 10,000 population equivalent (p.e.) (Article 5, UWWTD). Furthermore, according to Article 5.5 of the UWWTD, agglomerations over 10,000 p.e. which discharge into the catchment of a nutrient sensitive area may also have to be subjected to more stringent treatment.

In an Irish context, agglomerations which have been identified as discharging into nutrient sensitive areas are subjected to the requirements of the Urban Waste Water Treatment Regulations 2001 (S.I. 254 of 2001). These regulations require, for qualifying discharges, that emission limit values (ELVs) are set for Total Phosphorus (TP) and/or Total Nitrogen (TN) in accordance with the requirements of the Urban Waste Water Treatment Directive, and that one or both parameters may be applied depending on the local situation. These ELVs are applied through waste water discharge authorisations issued under the Waste Water Discharge (Authorisation) Regulations 2007 (S.I. 684 of 2007) as amended.

An amendment to S.I. 254 of 2001 was made in 2010 (S.I. 48 of 2010) granting the EPA the role of determining which of the parameters (TP/TN) to apply in any given situation. The EPA has re-examined the relevant licences to determine the relevant limiting nutrient in

each instance and whether an amendment to Waste Water Discharge Licences is appropriate in the context of this legislative change.

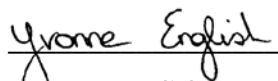
The decision to set a requirement for the removal or reduction of nitrogen and/or phosphorus in a waste water discharge authorisation is based on the effect that the specific nutrient has on the level of eutrophication in a receiving water or connected downstream waters.

In 2016 the EPA carried out a review of sensitive areas as required by the Urban Waste Water Treatment Directive. As part of this review, work was carried out to identify the relevant limiting nutrient(s) for agglomerations greater than 10,000 p.e. discharging into nutrient sensitive waters and their catchments.

Through this review it was determined that the limiting nutrient for the Lee Estuary/ Lough Mahon, which is a designated nutrient sensitive waterbody, into which the Carrigtwohill and Environs agglomeration (D0044-01) discharges, is Total Phosphorus.

Recommendation

I recommend that the licence amendment be approved as set out in the attached recommended Technical Amendment. Such amendment does not result in the relevant requirements of Regulation 6(3) of the Waste Water Discharge (Authorisation) Regulations 2007 as amended, ceasing to be satisfied.


Yvonne English

Environmental Licensing Programme