

# EPA Application Form

## 7.3.2 - Equivalent Level of Protection (Sewer) - Attachment

**Organisation Name: \***

**Application I.D.: \***

**Amendments to this Application Form Attachment**

<b>Version No.</b>	<b>Date</b>	<b>Amendment since previous version</b>	<b>Reason</b>
V.1.0	July 2017	N/A	Online application form attachment
As above	Mar 2018	Identification of required fields	Assist consistent completion of attachment

### **7.3.1 Equivalent Level of Protection (Emissions to Sewer)**

#### **Background information**

In relation to emissions to sewer, Article 15 of the Industrial Emissions Directive (Directive 2010/75/EU) states:

*With regard to indirect releases of polluting substances into water, the effect of a water treatment plant may be taken into account when determining the emission limit values of the installation concerned, provided that an equivalent level of protection of the environment as a whole is guaranteed and provided this does not lead to higher levels of pollution in the environment.*

Furthermore, emission limit values (ELV's) applied by the Agency for an installation's emissions to sewer must satisfy the consent conditions (ELVs and other requirements) specified by Irish Water, as required by Section 99E of the EPA Act 1992 as amended.

(Note: To avoid unnecessary delays in the application assessment process, it is important that the applicant licensee liaises with Irish Water (or other water services authority responsible for the sewer network) at the earliest available opportunity, with a view to establishing consent conditions.)

#### **Assessment of 'equivalent level of protection'**

To comply with Article 15 above, the following must be demonstrated:

It must be demonstrated that the level of treatment of an installation's effluent, on and off site, is collectively equivalent to BAT and environmental quality standards will be observed in the receiving water (i.e., 'equivalent level of protection').

- (1) Consider the parameters relevant to the installation's emissions to sewer (i.e., characteristics of discharge)
- (2) Do sectoral BAT associated emission levels (BAT-AELs) exist for these parameters? These are the relevant sectoral BAT-AELs.
- (3) Do the emission limits proposed for installation comply with all the relevant sectoral BAT-AELs? If Yes, ok; if not proceed to (4) below.
- (4) If not, does the licence for the relevant Irish Water agglomeration discharge specify limits which comply with all/the remainder of the relevant sectoral BAT-AELs for the installation? If Yes, ok; if not proceed to (5) below.
- (5) If no to (3) and (4) above, the applicant/licensee needs to otherwise determine whether the level of treatment in the sewer network is sufficient to treat the installation's discharges to comply with relevant sectoral BAT-AELs.

#### **Assessment of 'levels of pollution in the environment'**

To comply with Article 15 above, the following must be demonstrated:

In granting a licence for an installation, and in accordance with Section 83(5)(a)(iii) of the EPA Act 1992 as amended, as well as in accordance with Articles 5 and 7 of S.I. 272 of 2009, the Agency must ensure that the quality of any relevant receiving water is not impaired or that the relevant Environmental Quality standards are not exceeded. It

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must be demonstrated whether or not, upon discharge from the Irish Water WWTP, the environmental quality standards<sup>1</sup> (EQSs) for the receiving water will be breached as a result of the installation's discharges. (i.e. 'does not lead to higher levels of pollution in the environment')

### Details on level of protection provided (on and off-site)

Please provide details in the table below on the installation emissions to the sewer; the processes which contribute to the emissions, the type of on-site treatment (if any), off-site treatment (if any) and the proposed maximum daily flows.

Table 1: On-site treatment – abatement at installation				
Emission Reference	Proposed / Existing	Process Description	Abatement	Proposed max. flow (m <sup>3</sup> /day)
SE-1	Existing	Vehicle washing and rainwater run-off	Oil Interceptor	10
<b>Total:</b>				10
Off-site treatment – Municipal Waste water treatment plant (MWWTP)				
Name of sewer network/agglomeration: Greater Dublin Agglomeration				
Normal daily flow rate in network (m <sup>3</sup> /day): Unknown				
Responsible authority for network/agglomeration: Uisce Eireann				
Type of treatment: Primary, Secondary & Tertiary				
Receiving water name (and waterbody type): Lower Liffey Estuary				
No. of dilutions available in the receiving water: Unknown				
Waste water discharge authorisation: <b>(Y/N) D00034-01</b>				
<p>The maximum discharge volumes from the installation represent an unknown % of effluent discharge volumes from the Irish Water municipal wastewater treatment plant (MWWTP). The Agency's most recent national annual report/the most recent AER indicates that this MWWTP is:</p> <p>in compliance with the discharge limits for the following parameters:</p> <p>not in compliance with the discharge limits for the following parameters: BOD &amp; COD</p>				

<sup>1</sup> EQSs as specified in Schedule 5 of *European Communities Environmental Objectives (Surface Waters) Regulations 2009* as amended.

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### Assessment details

Please enter the required details in the assessment table below.

*Edit the parameters in column 1 in accordance with the installation's characteristics of emissions to sewer.*

*Enter any limits specified by Irish Water (or other water service authority) in column 3.*

*In column 4 determine, if necessary for any parameter, the concentration of the installation's discharges after having received any treatment at the installation prior to discharge, and after having received any treatment in the sewer network/agglomeration prior to discharge.*

Specify the relevant the BAT-AELs in Column 5.

Specify the relevant the EQSs in Column 6.

<b>Table 2</b>				
<b>Parameter</b> (sample parameters included below)	<b>Irish Water/ WSA</b>	<b>After on and off site treatment</b>	<b>BAT-AEL</b>	<b>EQS</b>
Temperature	42			
pH	6-10			
	<b>mg/l</b>	<b>mg/l</b>	<b>mg/l</b>	<b>mg/l</b>
Biological Oxygen Demand	6,000			
Chemical Oxygen Demand	12,000			
Suspended Solids	2,500			
Ammonia	100			
Total Phosphorous	100			
Sulphates	1,000			
Detergents (as MBAS)	100			
Oils, Fats, Grease	100			

**Table 3: Please include any other information you consider relevant in the (free text) box below:**

The parameters relevant to the installations emissions to sewer and the emission limit values set in the current licence were agreed by the Agency and the Sanitary Authority.

Best Available Techniques (BAT) Reference Document for Waste Treatment 2018 does not set BAT-AELs for discharges to sewer. There are BAT-AELs for indirect discharges to water but these may not apply if the downstream waste water treatment plant abates the pollutants concerned, provided this does not lead to a higher level of pollution in the environment. The emission to sewer from the installation is treated in an Uisce Eireann WWTP had operates under a Waste Discharge Licence issued by the EPA.