Annual Environmental Report 2019



Ballymore Eustace

D0238-01

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1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2019 AER

This Annual Environmental Report has been prepared for D0238-01, Ballymore Eustace, in Kildare in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

There were no capital works, significant changes or operational improvements undertaken this year.

1.2 TREATMENT SUMMARY

The agglomeration is served by a wastewater treatment plant(s)

• BALLYMORE EUSTACE NEW WWTP with a Plant Capacity PE of 2000, the treatment type is 3P - Tertiary P removal

1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference Treatment Plant		Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF1400D0238SW001	BALLYMORE EUSTACE NEW WWTP	Treated	Compliant	N/A

1.4 LICENCE SPECIFIC REPORTING INCLUDED IN AER

Assessment / Report	Included in AER
Small Stream Risk Score Assessment	Yes

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 BALLYMORE EUSTACE NEW WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - BALLYMORE EUSTACE NEW WWTP

A summary of influent monitoring for the treatment plant is presented below. This monitoring is primarily undertaken in order to determine the overall efficiency of the plant in removing pollutants from the raw wastewater.

Parameters	Number of Samples	Annual Max	Annual Mean
Suspended Solids mg/l	12	699	377.49
COD-Cr mg/l	12	1508	1037.06
Total Phosphorus (as P) mg/l	12	14.3	10.53
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	12	413	318.66
Hydraulic Capacity	N/A	368	112.8

If other inputs in the form of sludge / leachate are added to the WWTP then these are included in Section 2.1.5 if applicable.

Significance of Results:

The annual mean hydraulic loading is less than the peak Treatment Plant Capacity. The annual maximum hydraulic loading is less than the peak Treatment Plant Capacity. Further details on the plant capacity and efficiency can be found under the sectional 'Operational Performance Summary'. The design of the wastewater treatment plant allows for peak values and therefore the peak loads have not impacted on compliance with Emission Limit Values.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF1400D0238SW001

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	12	0	0	49.16	Pass
Suspended Solids mg/l	35	87.5	N/A	12	0	0	12.01	Pass
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	25	50	N/A	12	0	0	4.16	Pass
pH pH units	6-9	6-9	N/A	12	0	0	6.84	Pass
Ammonia-Total (as N) mg/l	5	6	N/A	12	0	0	0.46	Pass
Total Phosphorus (as P) mg/l	2	2.4	N/A	2	0	0	0.44	Pass
ortho-Phosphate (as P) - unspecified mg/l	1	1.2	N/A	12	0	0	0.06	Pass

Notes:

Cause of Exceedance(s):

Not applicable

^{1 –} This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied

Significance of Results:

The WWTP is compliant with the ELV's set in the Wastewater Discharge Licence.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF1400D0238SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Status
Upstream	292660, 209723	RS09L010400	No	No	No	No	Moderate
Downstream	292478, 209783	RS09L010410	No	No	No	No	Moderate

The results for ambient results and / or additional monitoring data sets are included in the **Appendix 7.1 - Ambient monitoring summary.**

Significance of Results:

The WWTP discharge was compliant with the ELV's set in the wastewater discharge licence.

The ambient monitoring results does not meet the required EQS. The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009.

Based on ambient monitoring results a deterioration in BOD, Ammonia & Ortho-P concentrations downstream of the effluent discharge is noted.

A deterioration in water quality has been identified, however it is not known if it or is not caused by the WWTP.

Other causes of deterioration in water quality in the area are unknown.

The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - BALLYMORE EUSTACE NEW WWTP

2.1.4.1 Treatment Efficiency Report - BALLYMORE EUSTACE NEW WWTP

Treatment efficiency is based on the removal of key pollutants from the influent wastewater by the treatment plant. In essence the calculation is based on the balance of load coming into the plant versus the load leaving the plant. The efficiency is presented as a percentage removal rate.

A summary presentation of the efficiency of the treatment process including information for all the parameters specified in the licence is included below:

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
TN	N/A	N/A	N/A
cBOD	10982	139	99
COD	35739	1649	95
ТР	363	15	96
SS	13009	403	97

Note: The above data is based on sample results for the number of dates reported

2.1.4.2 Treatment Capacity Report Summary - BALLYMORE EUSTACE NEW WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

BALLYMORE EUSTACE NEW WWTP	
Peak Hydraulic Capacity (m³/day) - As Constructed	1350
DWF to the Treatment Plant (m³/day)	450
Current Hydraulic Loading - annual max (m³/day)	368

BALLYMORE EUSTACE NEW WWTP	
Average Hydraulic loading to the Treatment Plant (m³/day)	112.8
Organic Capacity (PE) - As Constructed	2000
Organic Capacity (PE) - Collected Load (peak week)Note1	815
Organic Capacity (PE) - Remaining	1185
Will the capacity be exceeded in the next three years? (Yes/No)	No

Nominal design capacities can be based on conservative design principles. In some cases assessment of existing plants has shown organic capacities significantly higher than the nominal design capacity. Accordingly plants that appear to be overloaded when comparing a collected peak load with the nominal design capacity can be fully compliant due to the safety factors in the original design.

2.1.5 SLUDGE / OTHER INPUTS - BALLYMORE EUSTACE NEW WWTP

'Other inputs' to the waste water treatment plant are summarised in table below

Input type	Quantity	Unit	P.E.	% of load to WWTP	Included in Influent Monitoring (Y/N)?	Is there a leachate/sludge acceptance procedure for the WWTP?	Is there a dedicated leachate/sludge acceptance facility for the WWTP? (Y/N)	
There is no Sludge and Other Input data for the Treatment Plant included in the AER.								

3 COMPLAINTS AND INCIDENTS

3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints			
There were no relevant environmental complaints in 2019.						

3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Irish Water but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	No. of incident occurrences	Recurring (Y/N)	Closed (Y/N)
Uncontrolled release	Adverse Weather	1	No	Yes
Uncontrolled release	Adverse Weather	1	No	Yes
Uncontrolled release	Adverse Weather	1	No	Yes

Incident Type		Cause	No. of incident occurrences	Recurring (Y/N)	Closed (Y/N)
Uncontrolled r	elease	Adverse Weather	1	No	Yes

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2019	4
Number of Incidents reported to the EPA via EDEN in 2019	4
Explanation of any discrepancies between the two numbers above	N/A

4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow	Irish Grid Ref.	Included in Schedule A4 of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2019 (No. of events)	Total volume discharged in 2019 (m3)	Monitoring Status
твс	292148, 210239	No	Low	Not yet Assessed	Unknown	Unknown	Not Monitored
New SW2	292637, 209727	Yes	Low	Meeting	Unknown	Unknown	Monitored

SWO Summary	
How much sewage was discharged via SWOs in the agglomeration in the year (m3)?	Unknown
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	N/A
The SWO Assessment included the requirements of relevant of WWDL schedules?	Yes
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS

4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
D0238-SIP:01	Discharges from SW1-P (existing WWTP discharge) to cease	А	31/12/2012	Yes	Works Completed		
D0238-SIP:02	SW2 - Upgrading of SWO to comply with the criteria outlined in the DoEHLG "Procedures and Criteria in relation to Storm Water Overflows, 1995".	С	31/12/2012	Yes	Works Completed		
D0238-SIP:03	SW3 - Upgrading of SWO to comply with the criteria outlined in the DoEHLG "Procedures and Criteria in relation to Storm Water Overflows, 1995".	С	31/12/2012	Yes	Works Completed		
D0238-SIP:04	Waste Water treatment plant and ancillary works	С	31/12/2012	Yes	Works Completed		

A summary of the status of any improvements identified by under Condition 5.2 is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments	
There are no Improvem	ents Programme for this Agglomeration.				

4.2.3 SEWER INTEGRITY RISK ASSESSMENT

The utilisation of multiple capital maintenance programmes and the outputs of the workshops with the Local Authority Operations Staff held under the programme can be used to satisfy the requirements of Condition 5 regarding network integrity. Improvement works identified by way of these programmes and workshops will be included in the Improvements Summary Table.

5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Year included in AER	Included in this AER	Reference to relevant section of AER
Priority Substances Assessment	Yes	2011	No	
Small Stream Risk Score Assessment	Yes	2017	Yes	5.2

5.1 PRIORITY SUBSTANCES ASSESSMENT

The Priority Substances Assessment Report has been included in the AER 2011.

5.2 SMALL STREAM RISK SCORE ASSESSMENT

The Small Stream Risk Score Assessment Report is included in Appendix 7.2 - Small Stream Risk Score Assessment. A summary of the findings of this report is included below.

Parameter	Value
Condition 5 Improvement Programme Reference	N/A
Does SSRS indicate discharges are posing a pollution risk?	No
Downstream SSRS Water Quality Risk	Probably Not At Risk

Parameter	Value
SSRS Required?	Yes
Upstream SSRS Water Quality Risk	Probably Not At Risk
What is Downstream SSRS?	8 *
What is Upstream SSRS?	9.6 *
Does improvement programme include any procedural and/or infrastructural works?	N/A

^{*} SSRS summary is based on 2018 sampling and analysis as sampling and analysis was not possible at Ballymore Eustace Agglomeration in 2019 owing to a combination of factors:

- Significant instream and bankside construction works were being undertaken in relation to a local road reconstruction. The Liffey River (large, swift) was diverted for a considerable distance beginning just downstream of the WWTP discharge point.
- High rainfall in preceding weeks (and months) meaning ESB were releasing excess water from Pollaphuca Reservoir, occurring at 8am and 6pm each day, leading to constant extremely-high river water levels.

6 CERTIFICATION AND SIGN OFF

6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for consideration of a Technical Amendment / Review of the licence?	No
List reason e.g. additional SWO identified	N/A
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	No
List reason e.g. changes to monitoring requirements	N/A
Have these processes commenced?	N/A
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	Yes

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Date: 06/03/2020

This AER has been produced by Irish Water's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of,

Katherine Walshe

Acting Head of Environmental Regulation.

7 APPENDIX

Appendix

Appendix 7.1 - Ambient Monitoring Summary

Appendix 7.2 - Small Stream Risk Score Assessment

Ballymore Eustace Ambient Monitoring Summary 2019

			Receivin	g Waters D	esignation	(Yes/No)			Mean (mg/l)
Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish National Grid Reference (Easting, Northing)	EPA Feature Coding Tool code	Bathing Water	Drinking Water	FWPM	Shellfish	Current WFD Status	cBOD	o- Phosphate (as P)	Ammonia (as N)
Upstream Monitoring Point	292660, 209723	RS09L010400	No	No	No	No	Moderate	1.091	0.016	0.225
Downstream Monitoring Point	292478, 209783	RS09L010410	No	No	No	No	Moderate	1.273	0.020	0.239
Difference								0.182	0.004	0.014
EQS								1.500	0.035	0.065
% of EQS								12.121%	10.390%	20.979%

Ballymore Eustace Ambient Monitoring Summary 2019

Upstream Results								
Date		Ammonia (mg/l) *	Ortho P (mg/l)	BOD (mg/l) *	pH (mg/l)			
10/01/2019	U/S	0.29	0.02	1	7.42			
15/02/2019	U/S	0.22	0.03	1	7.55			
27/03/2019	U/S	0.28	0.03	1	7.51			
10/04/2019	U/S	0.17	0.02	2	7.66			
08/05/2019	U/S	0.15	0.01	1	7.76			
12/06/2019	U/S	0.13	0.01	1	7.46			
03/07/2019	U/S	0.14	0.01	1	7.42			
15/08/2019	U/S	0.2	0.01	1	7.53			
25/09/2019	U/S	0.22	0.01	1	7.49			
17/10/2019	U/S	0.35	0.01	1	7.57			
21/11/2019	U/S	0.33	0.02	1	7.64			
1	0.225	0.016	1.091	7.55				
9	5%ile	0.340	0.030	1.500	7.71			

Downstream Results									
Date		Ammonia (mg/l) *	Ortho P (mg/l) *	BOD (mg/l) *	pH (mg/l)				
10/01/2019	D/S	0.35	0.03	1	7.44				
15/02/2019	D/S	0.22	0.03	2	7.6				
27/03/2019	D/S	0.32	0.04	2	7.53				
10/04/2019	D/S	0.19	0.02	2	7.66				
08/05/2019	D/S	0.13	0.01	1	7.78				
12/06/2019	D/S	0.18	0.01	1	7.51				
03/07/2019	D/S	0.16	0.02	1	7.48				
15/08/2019	D/S	0.23	0.02	1	7.55				
25/09/2019	D/S	0.19	0.01	1	7.54				
17/10/2019	D/S	0.36	0.01	1	7.8				
21/11/2019	D/S	0.3	0.02	1	7.68				
Mean		0.239	0.020	1.273	7.597				
9	5%ile	0.355	0.035	2.000	7.790				

^{*} Where the concentration in the result is less than the limit of detection (LOD), a value of 50% of the LOD was used in calculating the mean and 95%ile concentrations.

Small Stream Risk Score (SSRS) Assessment

BALLYMORE EUSTACE WASTEWATER AGGLOMERATION

Co. Kildare

October 2019



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1 INTRODUCTION

This report sets out findings of Small Stream Risk Score (SSRS) assessment at Ballymore Eustace Waste Water Treatment Plant (WWTP), Co. Kildare. The discharge is to the upper Liffey River.

SSRS sampling and analysis was not possible at Ballymore Eustace Agglomeration in 2019 owing to a combination of factors:

- Significant instream and bankside construction works were being undertaken in relation to a
 local road reconstruction. The Liffey River (large, swift) was diverted for a considerable
 distance beginning just downstream of the WWTP discharge point.
- High rainfall in preceding weeks (and months) meaning ESB were releasing excess water from Pollaphuca Reservoir, occurring at 8am and 6pm each day, leading to constant extremely-high river water levels.

The above is illustrated in photographs shown in Section 3.3 of this report.

There was no possibility of entering the river at any point upstream and downstream of the discharge location owing to river depth, which was >2m in parts of the channel that are usually <0.4m.

There was no downstream sampling location that was not affected by the extensive instream works and channel diversion.

Even if the river had been accessible, the scale and location of the construction works was such that any upstream/downstream impact would not be able to be interpreted as anything other than potential construction / river diversion related impact. SSRS in this situation would be meaningless.

It is the view of the SSRS operator that SSRS assessment will not be possible until well after this large construction project is complete and river ecology has had an opportunity to recover following such extensive instream interventions.

2 METHODOLOGY

2.1 SSRS

Not Applicable.

The site visit occurred on October 17th 2019. The operator carried out a site safety induction process before gaining access to the river, which was fully cordoned off in relation to construction works. Sampling was not possible owing to extensive river diversion, construction site impact and excessively-high water levels.

3 RESULTS

3.1 SSRS Summary

Table 1: SSRS summary - Ballymore Eustace WWTP

Site	Location (X, Y)	SSRS	SSRS Risk Category		
Upstream	292167 210342	n/a	n/a		
Downstream	292181 210177	n/a	n/a		

3.2 Water Quality

Not Applicable.

3.3 Site Photographs



Plate 1: Significant instream construction works at the downstream SSRS site: sheet piling, channel reconstruction/diversion - **X** marks approximate position of usual sampling location.



Plate 2: Construction works on opposite bank – channel reprofiling, geotextile bank revetment, construction related spoil upstream of discharge point - **X** marks approximate position of usual sampling location.



Plate 2: Excessively high river levels as a result of river diversion works and pulsed release of water from Pollaphuca Reservoir upstream (8am and 6pm each day) - **X** marks approximate position of usual sampling location. At this point the river was extremely swift and would be about 2m depth, or more.

3.4 SSRS Comparison 2014 - 2019

Table 2 compares SSRS results for sampling for the years 2014 to 2019. It can be seen that in recent years the discharge has no distinguishable impact on water quality according to SSRS. In some years the upstream site is poorer. In most years the downstream site is better quality than upstream.

Table 2: SSRS Comparison 2014 - 2019 Ballymore Eustace WWTP

	SSRS					SSRS Risk Category						
Site	2014	2015	2016	2017	2018	2019	2014	2015	2016	2017	2018	2019
U/S	7.2	8.0	3.2	5.6	9.6	n/a	Indet.	PNAR	AR	AR	PNAR	n/a
D/S	7.2	7.2	4.8	8.8	8.0	n/a	Indet.	Indet.	AR	PNAR	PNAR	n/a

AR = At Risk; PNAR = Probably Not At Risk; Indet. = Indeterminate

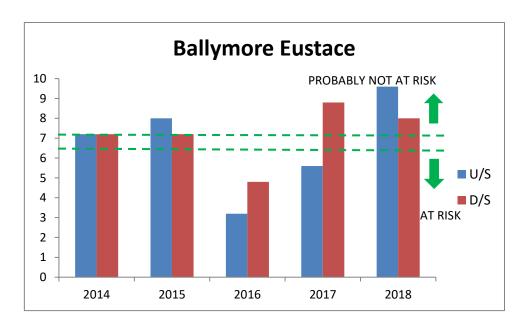


Figure 1 - SSRS Comparison 2014 - 2019 Ballymore Eustace WWTP

4 REFERENCES

Anon. (2009) Small Streams Risk Score (SSRS) Training Manual. A pollution investigation tool for use in the field. White Young Green, Apex Business Centre, Blackthorn Road, Sandyford, Dublin.

APPENDIX 1 SSRS Sheets

N/A