Annual Environmental Report





Ballaghkeen

D0398-01

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1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2021 AER

This Annual Environmental Report has been prepared for D0398-01, Ballaghkeen, in Wexford 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 significant changes nor improvements under taken in 2021

1.2 TREATMENT SUMMARY

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

- Ballaghkeen WWTP with a Plant Capacity PE of 500, the treatment type is 3P Tertiary P removal
- THORNBROOK ESTATE WWTP with a Plant Capacity PE of 150, 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
TPEFF3300D0398SW001	Ballaghkeen WWTP	Treated	Non-Compliant	Ammonia-Total (as N) mg/l ortho-Phosphate (as P) - unspecified mg/l

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF3300D0398SW002	THORNBROOK ESTATE WWTP	Treated	Non-Compliant	ortho-Phosphate (as P) - unspecified mg/l

1.4 LICENCE SPECIFIC REPORTING

Assessment / Report

There are no Licence Specific Reports included in this AER.

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 BALLAGHKEEN WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - BALLAGHKEEN 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
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	6	887	481
Suspended Solids mg/l	6	341	204
COD-Cr mg/l	6	2770	1026
Hydraulic Capacity	N/A	675	107

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 greater 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 - TPEFF3300D0398SW001

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 exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	6	N/A	N/A	21	Pass
Suspended Solids mg/l	35	87.5	N/A	6	N/A	N/A	3.18	Pass
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	10	20	N/A	6	N/A	N/A	2.54	Pass
pH units	9.00	9.00	N/A	6	N/A	N/A	7.31	Pass
Ammonia-Total (as N) mg/l	5.00	6.00	N/A	6	2	2	4.04	Fail
ortho-Phosphate (as P) - unspecified mg/l	0.800	0.960	N/A	6	6	6	1.85	Fail
Visual Inspection Descriptive	N/A	N/A	N/A	6	N/A	N/A	N/A	

Notes:

1 - This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied <math>2 - For pH the WWDA specifies a range of pH6 - 9

Cause of Exceedance(s):

No additional process optimisation is possible regarding Ammonia and Orthophosphate pending major upgrade

Significance of Results:

Plant has be optisimisaed to maximum extend with existing infrastructure

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF3300D0398SW001

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 Ecological Status
Upstream	307188, 137572	RS12S030020	No	No	No	No	Moderate
Downstream	306509, 137395	RS12S030030	No	Yes	No	No	Moderate

The table below provides a summary of monitoring results for designated ambient monitoring points. The upstream and downstream annual mean values are shown (mg/l), and the difference between both monitoring stations is given as a percentage of the Environmental Quality Standard (EQS) where relevant.

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
BOD - 5 days (Total) mg/l	RS12S030020	1.83	RS12S030030	1.90	1.50	4.8
Ammonia-Total (as N) mg/l	RS12S030020	0.096	RS12S030030	0.089	0.065	-11.5

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
ortho-Phosphate (as P) - unspecified mg/l	RS12S030020	0.030	RS12S030030	0.033	0.035	8.4
Dissolved Oxygen mg/l	RS12S030020	9.81	RS12S030030	9.84	N/A	
pH units	RS12S030020	7.44	RS12S030030	7.45	N/A	

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

The ambient monitoring results do not meet the required EQS at the upstream and the downstream monitoring locations. 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 and Orthophosphate, 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: Discharge from SW001 and SW002 are encompassed by these monitoring points, upper catchment encompasses heavy agricultural activity and onsite private WWTp's, the the level of treatment provided and consistent discharge level of CBOD achieved, and quality of waters upstream of discharges it is considered that WWTP's are not primary impact source

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 - BALLAGHKEEN WWTP

2.1.4.1 Treatment Efficiency Report - Ballaghkeen 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)		
SS	7944	124	98		
COD	39927	804	98		
ТР	N/A	N/A	N/A		
ТN	N/A	N/A	N/A		
cBOD	18722	99	99		

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

2.1.4.2 Treatment Capacity Report Summary - Ballaghkeen 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.

Ballaghkeen WWTP	
Peak Hydraulic Capacity (m³/day) - As Constructed	675
DWF to the Treatment Plant (m ³ /day)	113
Current Hydraulic Loading - annual max (m³/day)	675
Average Hydraulic loading to the Treatment Plant (m³/day)	106.6
Organic Capacity (PE) - As Constructed	500
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	379
Organic Capacity (PE) - Remaining	121
Will the capacity be exceeded in the next three years? (Yes/No)	No

No minal 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 - BALLAGHKEEN 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	There is no Sludge and Other Input data for the Treatment Plant included in the AER.											

2.2 THORNBROOK ESTATE WWTP - TREATED DISCHARGE

2.2.1 INFLUENT MONITORING SUMMARY - THORNBROOK ESTATE 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
COD-Cr mg/I	6	855	514
Suspended Solids mg/l	6	228	86
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	6	536	246
Hydraulic Capacity	N/A	64	27

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.

2.2.2 EFFLUENT MONITORING SUMMARY - TPEFF3300D0398SW002

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 exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	6	N/A	N/A	23	Pass
Suspended Solids mg/l	35	87.5	N/A	6	N/A	N/A	4.55	Pass
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/I	10	20	N/A	6	N/A	N/A	2.84	Pass
pH units	9.00	9.00	N/A	6	N/A	N/A	7.44	Pass
Ammonia-Total (as N) mg/l	5.00	6.00	N/A	6	N/A	N/A	0.123	Pass
ortho-Phosphate (as P) - unspecified mg/l	0.800	0.960	N/A	6	4	3	1.20	Fail
Visual Inspection Descriptive	N/A	N/A	N/A	6	N/A	N/A	N/A	

Notes: 1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied 2 – For pH the WWDA specifies a range of pH6-9

Cause of Exceedance(s):

Issue with dosing pump failure leading to long lead time to re-establish P-removal effectiveness in the plant, resulted in breaches

Significance of Results:

Ambient monitiorng indicated localized - slight impact

2.2.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF3300D0398SW002

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections b elow. 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 Ecological Status		
There is no Ambient data included in the AER.									

Where the receiving water body is not a river or where the data is not in EDEN - the Ambient data will be appended.

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

The ambient monitoring results do not meet the required EQS at the upstream and the downstream monitoring locations. The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009.

The discharge from the wastewater treatment plant does not have an observable impact on the water quality.

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.

2.2.4 OPERATIONAL PERFORMANCE SUMMARY - THORNBROOK ESTATE WWTP

2.2.4.1 Treatment Efficiency Report - THORNBROOK ESTATE 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)
ТР	N/A	N/A	N/A
TN	N/A	N/A	N/A
COD	5008	224	96
cBOD	2398	28	99
SS	840	44	95

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

2.2.4.2 Treatment Capacity Report Summary - THORNBROOK ESTATE 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.

THORNBROOK ESTATE WWTP	
Peak Hydraulic Capacity (m³/day) - As Constructed	101
DWF to the Treatment Plant (m³/day)	34
Current Hydraulic Loading - annual max (m³/day)	64.13
Average Hydraulic loading to the Treatment Plant (m³/day)	26.72
Organic Capacity (PE) - As Constructed	150
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	95
Organic Capacity (PE) - Remaining	55
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.

2.2.5 SLUDGE / OTHER INPUTS - THORNBROOK ESTATE 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	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 related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints					
There were no relevant environmental complaints in 2021.								

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)
Breach of ELV	WWTP upgrade required to meet ELV	1	Yes	No
Breach of ELV	Plant or equipment breakdown at WWTP	1	Yes	No

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2021	2
Number of Incidents reported to the EPA via EDEN in 2021	2
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 (chamber) where applicable	Irish Grid Ref. (outfall) Schedule of the WWDL Medium / Low)		Assessed against DoEHLG Criteria	No. of times activated in 2021 (No. of events)	Total volume discharged in 2021 (m3)	Monitoring Status	
ТВС	307118, 137539	No	Low	Meeting	Unknown	Unknown	Not Monitored

Any TBC SWO(s) were identified as part of the on-going National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

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?	No

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 a 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
D0398-SIP:03	Upgrade WWTPs to comply with ELVs specified in Schedule A	С	29/07/2009	Yes	Not Started		Capital works not funded in RC3. Capital works funding post 2024 will be contingent on the project being included in the 2025-2029 investment period.
D0398-SIP:01	Complete groundwater assessment of reed beds at Thornbrook Estate WWTP and re-line as necessary.	С	22/12/2015	Yes	Not Started		Capital works not funded in RC3. Capital works funding post 2024 will be contingent on the project being included in the 2025-2029 investment period.

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
D0398-SIP:02	Relocate secondary discharge point to bypass natural wetlands at Thornbrook Estate WWTP and discharge directly from constructed reed beds to River Sow	С	22/12/2015	Yes	Works Completed		

A summary of the status of any other improvements identified by under Condition 5 assessments - is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement	Improvement Description / or any Operational	Improvement	Expected Completion	Comments
Identifier	Improvements	Source	Date	
No additional improve	ments planned at this time.			

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 Tables 4.2.1 and 4.2.2.

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 a 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
Drinking Water Abstraction Point Risk Assessment	Yes	2015	No
Priority Substances Assessment	Yes	2015	No

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
Has a Technical amendment/licence review application been submitted to the Agency by IW?	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	Yes
List reason e.g. changes to monitoring requirements	Ambient monitoring location changes
Have these processes commenced?	N/A
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	N/A

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

Date: 07/04/2022

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

There are no Appendices included