Annual Environmental Report

2020

Milltown Malbay

D0321-01

CONTENTS

1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2020 AER

This Annual Environmental Report has been prepared for D0321-01, Milltown Malbay, in Clare 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.

1.2 TREATMENT SUMMARY

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

- Milltown/Malbay WWTP - 2020 with a Plant Capacity PE of 1360, the treatment type is 2 - Secondary treatment

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
TPEFF0300D0321SW001	Milltown/Malbay WWTP - 2020	Treated	Non-Compliant	Ammonia-Total (as N) mg/l BOD, 5 days with Inhibition (Carbonaceo mg/l ortho-Phosphate (as P) - unspecified mg/l

1.4 LICENCE SPECIFIC REPORTING INCLUDED IN AER

Assessment / Report	Included in AER
There are no Licence Specific Reports included in the AER.	

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 MILLTOWN/MALBAY WWTP - 2020 - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - MILLTOWN/MALBAY WWTP - 2020

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 (Carbonaceo mg/l	5	666	115.93
Suspended Solids mg/l	5	329	103.45
COD-Cr mg/l	5	895	226.76
Hydraulic Capacity	N/A	1507	404

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 greater 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’.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF0300D0321SW002

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	6	N/A	N/A	51.61	Pass
Suspended Solids mg/l	35	87.5	N/A	6	1	N/A	14.09	Pass
pH pH units	9	9	N/A	6	N/A	N/A	6.87	Pass
BOD, 5 days with Inhibition (Carbonaceo mg/l	2.6	5.2	N/A	6	6	6	16.54	Fail
Ammonia-Total (as N) mg/l	0.14	0.28	N/A	6	6	5	8.78	Fail
ortho-Phosphate (as P) - unspecified mg/l	0.08	0.16	N/A	6	6	6	0.92	Fail
Faecal coliforms no./100mls	N/A	N/A	N/A	2	N/A	N/A	N/A	
E. Coli MPN/100ml	N/A	N/A	N/A	2	N/A	N/A	2421	

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)
Enterococci (Intestinal) cfu/100ml	N/A	N/A	N/A	1	N/A	N/A	201	
Enterococci (Intestinal) MPN/100ml	N/A	N/A	N/A	1	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

Cause of Exceedance(s):

Inadequate infrastructure

Significance of Results:

There were 6 ELV breaches in 2020 for cBOD, Ammonia and Ortho Phospate. There was 1 ELV breach for Suspended Solids

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0300D0321SW002

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	103903, 17828	RS28L010100	No	No	No	No	Moderate
Downstream	103867, 17608	RS28L010160	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 not 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.

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.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - MILLTOWN/MALBAY WWTP - 2020

2.1.4.1 Treatment Efficiency Report - Milltown/Malbay WWTP - 2020

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

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
TP	N/A	N/A	N/A
COD	33976	4128	88
cBOD	17369	1323	92
SS	15499	1127	93

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

2.1.4.2 Treatment Capacity Report Summary - Milltown/Malbay WWTP - 2020

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.

Milltown/Malbay WWTP - 2020	
Peak Hydraulic Capacity (m^3/day) - As Constructed	347
DWF to the Treatment Plant (m^3/day)	116
Current Hydraulic Loading - annual max (m^3/day)	1507
Average Hydraulic loading to the Treatment Plant (m^3/day)	404
Organic Capacity (PE) - As Constructed	1360
Organic Capacity (PE) - Collected Load (peak week)[Note1]	1205
Organic Capacity (PE) - Remaining	155
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 - MILLTOWN/MALBAY WWTP - 2020

'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 2020.			

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

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2020	1
Number of Incidents reported to the EPA via EDEN in 2020	1
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 2020 (No. of events)	Total volume discharged in 2020 (m3)	Monitoring Status
SW003	105249, 179039	Yes	Low	Not Meeting	Unknown	Unknown	Not Monitored
SW004	105327, 179027	Yes	Low	Meeting	Unknown	Unknown	Not 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?	No
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
D0321-SIP:01	Appropriate works to ensure compliance with the emission limit values as set out in Schedule A: discharges and Discharge Monitoring.	C	31/12/2015	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.
D0321-SIP:02	Complete improvements to comply with ELVs specified in Schedule A. Implement, in accordance with Condition 5.6.1, either (a) improvements to the existing waste water works to achieve compliance with the emission limit values specified in Schedule A: Discharges and Discharge Monitoring of this licence, or (b) an	C	31/12/2015	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
	alternative primary discharge point, or (c) connection to another agglomeration.						

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 Improvements 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.

5.a Licence Specific Reports Summary Table

Licence Specific Report	Required by licence	Year included in AER	Included in this AER	Reference to relevant section of AER
There is no Licence Specific Report Required in this AER Annual Review.				

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	Yes
List reason e.g. changes to monitoring requirements	Change to Ambient Monitoring upstream
Have these processes commenced?	No
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:

Signed: Date: 11/05/2021

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

Ambient Monitoring Point from WWDL (or as agreed with EPA)	*Irish Grid Reference*	EPA Feature Coding Tool code	Receiving Waters Designation (Y/N)				
			Bathing Water	Drinking Water	FWPM	Shellfish	Status
Miltown Malbay - Upstream Leagard Stream	103898; 178660	RS28L010100	No	No	No	No	Unassigned
Miltown Malbay - Downstream Leagard Stream	103868; 178608	RS28L010160	No	No	No	No	Moderate

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	%EQS
cBOD mg/l	Miltown Malbay - Upstream Leagard Stream	5.8	Miltown Malbay - Downstream Leagard Stream	4.52	-1706.67%
Ortho-Phosphate (as P) mg/l	Miltown Malbay - Upstream Leagard Stream	0.614	Miltown Malbay - Downstream Leagard Stream	0.664	66.67%
Ammonia (as N) mg/l	Miltown Malbay - Upstream Leagard Stream	6.192	Miltown Malbay - Downstream Leagard Stream	5.716	-340.00%

		Parameter	pH	SS	BOD	DO % SAT	Ammonia N	Ortho-Phosphate P	DO mg/l	Faecal Coliforms	E Coli	Enterococci	Coliform Bacteria
		Max.	9	Varies	--	120	Varies	Varies	--	--	--	--	--
		Min.	6	--	--	80	--	--	--	--	--	--	--
		Test Method	--	--	--	--	--	--	--	--	--	--	--
Station	Sample Date	Analyst Conclusion	pH units	mg/l	mg/l	% O2	mg/l	mg/l	mg/l	no./100mls	MPN/100mls	MPN/100mls	MPN/100mls
Miltown Malbay - Upstream Leagard Stream	4-Feb-2020	-	7.25	3	2	99.1	1.43	0.25	10.3				
Miltown Malbay - Upstream Leagard Stream	13-May-2020	-	7.78	3	7	***62.5***	18.5	1.31	7.1				
Miltown Malbay - Upstream Leagard Stream	24-June-2020	-	7.33	***36***	8		***2.25***	***0.38***		691	2420	> 200	
Miltown Malbay - Upstream Leagard Stream	12-Aug-2020	-	7.59	10	8	95.1	6.75	0.81			> 2420	200	> 2420
Miltown Malbay - Upstream Leagard Stream	6-Oct-2020	-	7.15	4	4		2.03	0.32					

		Parameter	pH	SS	BOD	DO % SAT	Ammonia N	DO mg/l	Ortho-Phosphate P	Faecal Coliforms	E Coli	Enterococci	Coliform Bacteria
		Max.	9	Varies	--	120	Varies	--	Varies	--	--	--	--
		Min.	6	--	--	80	--	--	--	--	--	--	--
		Test Method	--	--	--	--	--	--	--	--	--	--	--
Station	Sample Date	Analyst Conclusion	pH units	mg/l	mg/l	% O2	mg/l	mg/l	mg/l	no./100mls	MPN/100mls	cfu/100mls	no./100mls
Miltown Malbay - Downstream Leagard Stream	4-Feb-2020	-	7.4	5	2	103.7	0.8	11	0.19				
Miltown Malbay - Downstream Leagard Stream	13-May-2020	-	7.69	8	5.6	***33***	18	3.8	0.82				
Miltown Malbay - Downstream Leagard Stream	24-June-2020	-	7.41	3	4		***2.5***		***0.4***	1986	1986	> 200	
Miltown Malbay - Downstream Leagard Stream	12-Aug-2020	-	6.71	48	8	101.2	5.25		1.65		> 2420	>200	> 2420
Miltown Malbay - Downstream Leagard Stream	6-Oct-2020	-	7.25	5	3		2.03		0.26				