Annual Environmental Report

2023

Letterkenny

D0009-01

CONTENTS

1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2023 AER

This Annual Environmental Report has been prepared for D0009-01, Letterkenny, in Donegal 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)

- Letterkenny WWTP with a Plant Capacity PE of 40000, 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
TPEFF0600D0009SW001	Letterkenny WWTP	Treated	Non-Compliant	Ammonia-Total (as N) 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 LETTERKENNY WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - LETTERKENNY 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
ortho-Phosphate (as P) - unspecified mg/l	11	4.79	2.49
Suspended Solids mg/l	11	594	115
Total Nitrogen mg/l	11	50	28
Total Phosphorus (as P) mg/l	11	8.05	3.13
BOD, 5 days with Inhibition (Carbonaceo mg/l	11	206	78
Ammonia-Total (as N) mg/l	11	55	28
COD-Cr mg/l	11	586	185
pH pH units	11	8.00	7.63
Hydraulic Capacity	N/A	26835	11661

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 - TPEFF0600D0009SW001

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	11	N/A	N/A	27	Pass
Suspended Solids mg/l	35	87.5	N/A	11	N/A	N/A	7.35	Pass
Temperature °C	25	25	N/A	11	N/A	N/A	5.39	Pass
BOD, 5 days with Inhibition (Carbonaceo mg/l	25	50	N/A	11	N/A	N/A	1.80	Pass
Total Oxidised Nitrogen (as N) mg/l	15	18	N/A	11	N/A	N/A	3.30	Pass
pH pH units	9	9	N/A	11	N/A	N/A	7.19	Pass
Ammonia-Total (as N) mg/l	5	6	N/A	11	4	3	2.63	Fail

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)
ortho-Phosphate (as P) - unspecified mg/l	1	1.2	N/A	11	N/A	N/A	0.045	Pass
Total Nitrogen mg/l	N/A	N/A	N/A	11	N/A	N/A	5.88	
Conductivity @20°C µS/cm	N/A	N/A	N/A	11	N/A	N/A	538	
Total Phosphorus (as P) mg/l	N/A	N/A	N/A	11	N/A	N/A	0.077	
Nitrite (as N) mg/l	N/A	N/A	N/A	11	N/A	N/A	0.186	
Nitrate (as N) mg/l	N/A	N/A	N/A	11	N/A	N/A	3.11	

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 pH 6 - 9

Cause of Exceedance(s):

See Incident Section of this report.

Significance of Results:

The WWTP is non compliant with the ELVs set in the Wastewater Discharge Licence. The Impact on receiving waters is assessed further in Section 2.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0600D0009SW001

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	220354, 220354	TW06007073LS1018	No	No	No	No	Poor
Downstream	220398, 412589	TW06007073LS1004	No	No	No	Yes	Poor

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 for the following: Ammonia-Total (as N) mg/l.

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.

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

The discharge from the wastewater treatment plant does have an observable impact on the designated shellfish water quality.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - LETTERKENNY WWTP

2.1.4.1 Treatment Efficiency Report - Letterkenny 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)
COD	759671	115303	85
SS	470911	31581	93
TN	116684	25280	78
cBOD	318753	7755	98
TP	12824	331	97

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

2.1.4.2 Treatment Capacity Report Summary - Letterkenny 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.

Letterkenny WWTP	
Peak Hydraulic Capacity (m^3/day) - As Constructed	32400
DWF to the Treatment Plant (m^3/day)	10800
Current Hydraulic Loading - annual max (m^3/day)	26835

Letterkenny WWTP	
Average Hydraulic loading to the Treatment Plant (m^3/day)	11661
Organic Capacity (PE) - As Constructed	40000
Organic Capacity (PE) - Collected Load (peak week)[Note1]	24410
Organic Capacity (PE) - Remaining	15590
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 - LETTERKENNY 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)
Landfill Leachate (delivered by tanker)	30972.4	Weight (Tonnes)	40000	100	Yes	Yes	Yes
Domestic /Septic Tank Sludge	44786.96	Weight (Tonnes)	40000	100	Yes	Yes	Yes
Waterworks Sludge	16091.36	Weight (Tonnes)	40000	100	Yes	Yes	Yes

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)
Other	2316.86	Weight (Tonnes)	40000	100	Yes	Yes	Yes

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
1	Water Pollution	0	1

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 Uisce Éireann 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	Recurring (Y/N)	Closed (Y/N)
Breach of ELV	Inadequate Operational Procedures/Training	No	Yes
Breach of ELV	Inadequate Operational Procedures/Training	No	Yes
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes
Uncontrolled release	Inadequate Operational Procedures/Training	No	Yes
Breach of ELV	Inadequate Operational Procedures/Training	No	Yes

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2023	6
Number of Incidents reported to the EPA via EDEN in 2023	6
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)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2023 (No. of events)	Total volume discharged in 2023 (m3)	Monitoring Status
SW2	216298,411296	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW3	216678,410864	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW5	216691,410886	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW6	216691,410886	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW7	217342,410951	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW8	217142,412030	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2023 (No. of events)	Total volume discharged in 2023 (m3)	Monitoring Status
SW9	217173,412123	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
TBC	217735,411666	Yes	Medium Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
TBC	217328,410871	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Monitored
TBC	217741,411223	Yes	Medium Significance	Not Meeting Criteria	Unknown	Unknown	Monitored
TBC	217917,411782	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored
SW018	218680,411220	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	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 wastewater discharge by metered SWOs during 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?	Unknown

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
D0009-SIP:01	Cessation of hydraulic bypass system at the WWTP	C	31/12/2012	Yes	Works Completed		
D0009-SIP:02	Installation of new outfall diffuser at primary discharge point	C	31/12/2012	Yes	Works Completed		
D0009-SIP:03	Installation of new storm water storage tanks at Ballyraine	C	31/12/2012	Yes	Works Completed		
D0009-SIP:04	SW016 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:05	SW017 to cease, or be upgraded to SWOs as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		

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
D0009-SIP:06	SW002 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:07	SW003 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:08	SW004 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:09	SW005 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:10	SW006 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:11	SW007 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:12	SW008 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		
D0009-SIP:13	SW009 to cease, or be upgraded to SWO as per DoEHLG criteria	A	31/12/2013	Yes	Works Completed		

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
D0009-SIP:14	Upgrading of Storm Water Overflows to comply with DoEHLG criteria	C	31/12/2013	Yes	Works Completed		
D0009-SIP:15	WWTP upgrade and improvement works	C	31/12/2012	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 Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
No additional improvements 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	Included in this AER
D0009-01-Priority Substances Assessment	Yes	No
D0009-01-Shellfish Impact Assessment	Yes	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
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	N/A
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	N/A
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	N/A

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

Signed: Date: 11/06/2024

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

Eleanor Roche

Head of Environmental Regulation.

7 APPENDIX

Appendix
Appendix 7.1 - Ambient monitoring summary

Letterkenny AMBIENT MONITORING SUMMARY 2023

Ambient Monitoring Point from WWDL (or as agreed with EPA)	***Irish Grid Reference***	**EPA Feature Coding Tool code**	**Receiving Waters Designation (Y/N)**				**WFD Status**
			Bathing Water	**Drinking Water**	**FWPM**	**Shellfish**	
Upstream Monitoring Point	220354, 220354	TW06007073LS1018	No	No	No	No	Poor
Downstream Monitoring Point	220398, 412589	TW06007073LS1004	No	No	No	Yes	Poor

Ambient Impact Assessment Table

Parameter Name	**Upstream Monitoring Point Location**	**Upstream Monitoring Point Annual Mean**	**Downstream Monitoring Point Location**	**Downstream Monitoring Point Annual Mean**	**EQS (Mean)**	**% EQS**
BOD mg/l	TW06007073LS1018	5.5	TW06007073LS1004	3.6	1.5	-126.6%
Ammonia (as N) mg/l	TW06007073LS1018	0.53	TW06007073LS1004	0.46	0.065	-107.6%
ortho-Phosphate (as P) - unspecified mg/l	TW06007073LS1018	0.030	TW06007073LS1004	0.030	0.035	0%

Letterkenny D0009-01 Ambient Monitoring Data

Station	Date	Ammonia (as N)	BOD	Dissolved Inorganic Nitrogen DIN	DO	Orthophosphate	pH	Total Nitrogen	Chlorophyll
Letterkenny - Upstream	29-Mar-23	0.77	4	1.07	95.8	0.03	8.2	NT	11.34
Letterkenny - Upstream	11-May-23	0.63	7	0.66	99.2	<0.02	8	20.5	74.84
Letterkenny - Upstream	6-Sep-2023	0.31 ***	4 ***	0.83 **	100 ***	0.03 **	8.3 ***	0.83 **	5.5 ***
Letterkenny - Upstream	08-Nov-23	0.2	4	0.83	93.3	0.03	7.8	0.97	1.3
Letterkenny - Downstream	29-Mar-23	0.6	5	0.94	95.3	0.03	8.2	NT	28.59
Letterkenny - Downstream	11-May-23	0.65	2	2.13	100.3	<0.02	7.7	1.96	11.13
Letterkenny - Downstream	6-Sep-2023	2.02 ***	3 ***	2.38 **	99.9 ***	0.07 **	8.2 ***	2.7 **	6 ***
Letterkenny - Downstream	08-Nov-23	0.14	4	0.68	94.7	0.03	7.8	0.94	1.26