


National Enforcement Priority: WATER – Discharge Licences / Misconnections	
Local Authority:	Activities
 Looking back at the year	<p><b>Tell the story of what your council did on this priority in the reporting year using the assessment criteria detailed in Table 2 of the guidance document. This is an opportunity to capture the impacts of the work completed to drive compliance. You are not required to duplicate data that you are submitting through the 'RMCEI data returns' or your 'RMCEI Plan'.</b></p> <p><i>[Guideline of 500 words per priority area]</i></p>
<p><b><u>Describe what was carried out under this activity in the previous reporting year – e.g.</u></b></p> <ul style="list-style-type: none"> <li>• Ensure all Section 4 Discharge Licence conditions are consistent with the requirements of the Surface Waters and Groundwater regulations.</li> <li>• Undertake risk based inspections/monitoring of Section 4 Discharge Licences. Inspect all licences in areas where discharge licensing is a significant pressure.</li> <li>• Ensure that all licensable discharges are authorised by a Section 4 Discharge Licence.</li> <li>• Ensure compliance with discharge licence conditions and follow up and close out non-compliances and LAWPRO referrals on Section 4s and misconnections.</li> <li>• Follow up on misconnections that have been identified as impacting on water quality, to ensure that works are undertaken by property owners to remediate such misconnections.</li> </ul>	<p><b><u>Discharge Licences:</u></b></p> <p>Discharge licence sampling in 2022 was carried out in accordance with the schedule determined from the RMCEI Risk Rating Tool, based on licence compliance assessment and review of risk data for the previous year. Medium Risk facilities ( Cat B ) are sampled 4 times per year by Meath CC and Low Risk facilities ( Cat C ) are sampled twice per year. There are no High Risk facilities ( Cat A ) among the licensed sites. 137 site inspections were carried out, compared to 118 planned inspections for 2022. The additional inspections arise in response to non-compliance and follow-up on addressing identified compliance issues.</p> <p>2022 monitoring data shows 35 licences out of 46 (76%) are categorised as Compliant or with Minor Non-Compliances. This is similar to compliance rates in 2021 ( 78%, 35 of 45 licences ) and represents a gradual improvement in compliance rates over the last 5 years, compared to 29 licences (62%) in that category in 2018.</p> <p>Where discharge sampling results or site inspection indicates a deterioration in the treatment performance of a licensed WWTP, this is raised directly with the licensee and WWTP service contractor, as a means of early intervention. The licensee is requested to take corrective action and to advise Meath CC on measures taken and any further measures proposed to return the WWTP to discharge compliance. Typically this entails WWTP servicing or repairs or improvements to site operational practices. Evidence on the service or repair works and other measures taken to achieve compliance are recorded on the licence file as a track on corrective actions, along with subsequent discharge monitoring data.</p> <p>In 2022 Meath CC has engaged with 3 licensed facilities where effluent volumes arising have increased as a result of increased numbers of persons ( refugees ) being accommodated in emergency accommodation. Meath CC has liaised closely with the licensed sites to manage compliance in the context of additional flows to WWTP. In one case the licensee arranged additional upgrade and control of the WWTP, and increased P removal rates through increased ferric dosing, as a means to treat effluent to standards better than the licence ELVs, and agreed additional monitoring and reporting procedures, as a means to manage mass load emissions to waters ( R. Delvin ), while proposals are developed for potential connection to foul sewer ( St. Claires NH, DL 05/07 ).</p>

In another case the licensee agreed to increased WWTP oversight and maintenance to ensure plant performance was maintained ( RBC discharge to sand polishing filter ), with provision for off-site tankering as back-up if non-compliance with ELVs or discharge volume limits became an issue ( Dept. of Defence, DL 15/02 ). In a third case, the licensee has agreed interim upgrade works to improve P removal and increased desludging frequency ( activated sludge plant with ferric dosing ), and has been advised on options to seek a licence review to accommodate increased discharge rates long-term, and is currently engaging with Meath CC on the requirements to pursue this, with particular attention on increased P removal efficiency to achieve a mass emission under increased discharge rates which is compatible with WFD objectives ( Gormanston College, DL 89/02 ).

Discharge licence DL 22/01 granted to MSD Ireland ( Dunboyne Biologics ) in 2022, involved treatment of effluent from site de-watering during a major construction project, with high levels of in-line control and monitoring on the effluent stream and innovative use of automated CO2 dosing to treat potential elevated pH in the effluent from contact with curing concrete. The control and treatment systems worked well, with reporting arrangements demonstrating licence compliance and tracking treatment adjustments in response to changes in incoming de-watering pH.

Discharge licence DL 18/01 ( Axial Properties Ltd ) is operating with P removal since 2018, following licence review, and this may have contributed to an improvement in Q Value on R. Tolka at 09T010600 to Q3-4 in 2019, which has been maintained in 2022.

Discharge licence application assessment follows guidance outlined in LASNTG and EPA manuals ( LASNTG, 2010, 2011 & EPA, 2011 ). A high proportion of the licences granted / reviewed in recent years involved upgraded WWTPs with discharge to groundwaters where this was feasible as an appropriate alternative to discharge to surface waters of limited assimilative capacity.

There were no referrals from LAWPRO in 2022 in relation to discharge licences.

The discharge licensing programme seeks to deploy limited monitoring and enforcement resources in proportion to assessed risks to water quality, with discharges with significant nutrient load potential or to sensitive waters given particular weighting. However Meath CC would expand activities in this work-stream if additional resources allowed and has engaged with CCMA project on LA resources for natural waters functions.

**Misconnections:**

Meath CC carried out misconnection surveys at a residential estate in Duleek, with blockages reported on the storm line by Meath CC Water Services. Initial inspections ( visual inspections of manholes ) identified foul

sewage in the storm line and narrowed the scope of investigation to a line serving 19 of the 57 houses in the estate.

The storm line outfalls to the main channel of the R. Nanny, immediately upstream of WFD monitoring site 08N010500, which was classed as Q3-4 in 2018 and deteriorated to Q3 in 2020. EPA Biological survey report for R. Nanny in 2020 notes filamentous algae and siltation issues along its entirety, however misconnections affecting this storm line are assessed as a significant pressure at this location.

The misconnection surveys in this estate were carried out by calling to the possible identified misconnected houses, following manhole inspections, over a 2-day period, explaining the nature of the visit/inspection and requesting to perform a dye test on the day, if allowed and feasible. There was a very positive reaction to this request with every available homeowner facilitating these inspections.

In total 36 visits were made over the 2 days with dye tests performed at 14 houses ( including 3 houses outside the initial scope to verify that the area of investigation was correctly identified ). Of the identified 19 houses (14 inspected including 3 outliers), 4 were found to be misconnected, with 8 houses remaining to be inspected. The foul sewerage is directed to the storm water line.

The estate in question was granted planning permission in 2000 ( 36 apartments and 120 houses ) and was taken in charge by Meath CC in 2011, and it appears that checks in advance of the TIC process to ensure that foul and storm lines were constructed correctly were not adequate to identify these problems.

The works required to rectify matters at this estate will involve 2 possible options - individually connecting the misconnected properties to the foul line, this would involve extensive works (digging up front gardens, footpath, roadway, possible electrical services etc) or to connect the section of the identified misconnected storm line to the foul line, both of which are on the public road within close proximity of each other. At this point, it is assessed that as the misconnections do not arise from actions or faults of the individual homeowners the approach of connecting this section of storm line into foul sewer may be preferable. On completion of remaining dye tests and investigation, the findings will be flagged with Meath CC Planning Section regarding the need for robust procedures in the TIC process to prevent a recurrence of similar issues.

In November 2022 Meath County Council engaged with Richard Fitzpatrick, Project Manager, Dublin Urban River LIFE (DURL) Project, who kindly offered to give a talk and meet with Meath CC Environment Section on the approach undertaken by South Dublin County Council to investigate and address urban misconnection issues. A key aim of the DURL project is to improve water quality and aquatic biodiversity in urban areas by finding domestic misconnections and to develop efficient methods for identifying and rectifying these issues. A comprehensive methodology was explained and discussed and a template received in how to approach and address misconnections issues, and Meath CC plans to incorporate these methods in future misconnections

	<p>works. We have agreed with Richard that he will assist us in investigating Misconnections in The Downes and College Park Estates in Dunshaughlin and adopting best practice. These estates drain into the headwaters of the Skane River which is a Meath County Council Priority Area for Action in the 3<sup>rd</sup> Cycle RBMP.</p>
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