



An
Bord
Pleanála

Inspectors Report

ABP-320482-24

Development	Trade effluent discharge to sewer
Type of Application	Appeal under Section 20 of the Local Government (Water Pollution) Act, 1977 and 1990 as amended.
Appellant	St. Paul's Area Development Enterprise Company Limited, SPADE Enterprise Centre, St. Paul's, North King Street, Smithfield, Dublin 7.
Licence Granted by	Uisce Éireann
Topic	Trade effluent discharge to sewers
Scientist	Finbarr Quigley B.Sc. Env. Sc. M.Sc.
Inspection Date	06 th March 2025

Contents

1.0	Introduction	Error! Bookmark not defined.
2.0	Application to Uisce Éireann.....	3
3.0	Appeal to An Bord Pleanála	5
4.0	Uisce Éireann response.....	6
5.0	Appellants response to Uisce Éireann submission.....	8
6.0	Site Inspection.....	10
7.0	Grounds of Appeal.....	10
8.0	Recommendation.....	14
9.0	Reasons and Considerations.....	15

1.0 Introduction

1.1. Scope of Report to Inspector

- 1.1.1. This report to the Board is a written record of my review and examination of an appeal under Section 20(1)(a) of the Local Government (Water Pollution) Act, 1977 as amended.

In my capacity of Inspectorate Environmental Scientist with over 25 years professional experience, I have the relevant expertise to provide a professional opinion to assess and make a recommendation on the appeal grounds.

1.2. Site Location and Description

- 1.2.1. The appeal site is located at North King Street, Smithfield, Dublin 7 in an urban setting of mixed residential and commercial use. The site is to the south of a converted church (formerly known as St. Paul's) which now operates as an Enterprise Centre offering events space and office space to local businesses. The entire site is operated by St. Paul's Area Development Enterprise (SPADE) Company Limited. The appellant is a not-for-profit enterprise, a registered charity (Charity Regulator No: 8718) and its stated aims are 'to assist local people and food producers to build businesses by offering an inclusive, supportive and nurturing community'.
- 1.2.2. SPADE (the appellant) operate a shared kitchen facility in a two-storey building to the south of the converted church at North King Street. The food preparation facilities

within the building consist of worktop areas, hobs, ovens, sinks, freezers and refrigerated storage areas. The facility is designed to be used by multiple users described as small owner-operator businesses, new start-ups and food entrepreneurs. The appellant opened the shared kitchen in October 2023 and suggested that 30 users would avail of the kitchen facilities in its first year of operation. Each user is restricted to booking the facilities for 10 hours per week. The kitchens opening hours are from 9am – 6pm Monday to Friday and from 8am – 9pm Saturday and Sunday.

2.0 Application to Uisce Éireann

2.1. Trade Effluent Licence (TEL) to discharge to sewer

2.1.1. On the 5th July 2023, the appellant made an application to Uisce Éireann (UE) for a Trade Effluent – FOG (Fats, Oils & Grease) Licence under Section 16 of the Local Government (Water Pollution) Acts, 1977 and 1990, as amended.

2.1.2. On 6th July 20123 UE acknowledged receipt of the application form (by email) and provided the reference number 13737 for the application. In this acknowledgement email, UE requested further details from the appellant relating to the processes that generate effluent and advised that there were two types of trade effluent licences;

- Trade Effluent FOG – usually for café, canteen, restaurant etc.
- Full Trade Effluent – usually for industrial, pharma, construction etc.

The appellant responded by email on the same date advising that they considered a FOG licence the appropriate option for their proposed operation.

2.1.3. On 12th July 2023, UE contacted the appellant requesting further information to progress the application. They advised that the Wastewater Source Control and Licensing (WWSCl) Team within UE required a site layout map and a further description on the number of businesses that would occupy the site.

2.1.4. On 14th July 2023, the appellant forwarded a site layout map and advised UE that 30 members (small owner operator businesses, new start-ups, food entrepreneurs) would be targeted in the first year of operation. the appellant advised that each member would be restricted to 10 hours use of the facilities per week.

2.1.5. On 17th July 2023 UE contacted the appellant and advised that “upon further review, the WWSCl Team advised that your business will fall under the “Food Production”

sector, in which case, you will need a full Trade Effluent (TE) Licence as a FOG Licence will not suffice.” UE provided a new application form for a TE licence as it varied from the TE Fog Licence form.

2.1.6. On 18th July 2023 the appellant submitted a completed TE Licence form to UE as requested.

2.1.7. On 16th November 2023 the appellant contacted UE and advise that they were now operational and provided water usage figures (from an inlet water meter) which indicated their total water usage would be approximately 10m³ per month. They requested that UE “re-evaluate our FOG licence application based on these figures”.

2.1.8. On 30th January 2024 UE responded to the above request stating “the WWSCL have provided me with a response and their intention is to process the application as a Full Trade Effluent licence under Commercial Food Production.” the appellant acknowledged the email on 31st January 2024 and did not make any comment on its content.

2.1.9. On 3rd July 2024 UE issued a Trade Effluent Licence (TE-11085-01) to the appellant. The licence included conditions relating to:

- The scope of the operation
- The type of trade effluent discharged to sewer
- Control and monitoring requirements
- Notifications, records and reporting requirements
- Infrastructure, maintenance and operational requirements
- Financial charges and provisions

2.1.10. The licence included Schedule A which outlined the Emission Limit Values (ELVs) for 11 wastewater parameters. The parameters listed were flow-rate, temperature, pH, toxicity, biochemical oxygen demand (BOD), chemical oxygen demand (COD), suspended solids, fats, oils & greases, total phosphorous, total nitrogen, sulphate, chloride and anionic surfactants/detergents. Schedule A outlined absolute ELV values for flow-rate, temperature, pH and toxicity and for all other parameters it was noted that ELVs can be measured in three ways;

- Concentration (24 hr composite sample) (mg/L)

- Concentration (instantaneous grab sample) (mg/L) and;
- Max Load (Kg/day)

Schedule A specified that instantaneous grab sampling will be sufficient unless otherwise requested by UE.

- 2.1.11.** The licence also included Schedule B which outlined the monitoring frequency and methodology of analysis to be carried out. This schedule outlined that bi-annual samples were required for 11 of the parameters identified in Schedule A. This schedule also included Toxicity and Respirometry parameters but specified that these parameters must only be monitored if requested by UE.
- 2.1.12.** Schedule B also required continuous flow-rate monitoring but specified (as per Condition 2.3) that the volume and rate of trade effluent discharged to sewer shall be calculated using inlet water meter readings (on the basis of the “water in/water out” principle), unless otherwise agreed in writing with UE.

3.0 Appeal under Section 20 of the Local Government (Water Pollution Act), 1977 as amended.

3.1. Appeal Details

- 3.1.1.** On 1st August 2024 An Bord Pleanála received a request from the appellant (Shared Kitchen) for an appeal under Section 20 (1)(a) of the Local Government (Water Pollution Act), 1977 as amended in relation to the Trade Effluent Licence (Ref. TE-11085-01) granted by UE.

3.2. Scope of the Appeal

- 3.2.1.** In their application documentation, the appellant outlined five grounds of appeal in relation to the licence issued by UE. The first three relate to the number, type and emission limit values of parameters set out in schedule A of the licence. The fourth relates to the monitoring frequency and methodology set out in Schedule B of the licence. The fifth ground relates to the suitability of a TE FOG licence or TE licence, given the likely nature and volume of their effluent discharges to sewer. The individual grounds for appeal are discussed in the next sections.

- 3.2.2. Ground 1.** The appellant suggested that the requirement to demonstrate compliance with the emission limit values for all the parameters listed in Schedule A is ‘excessive’. This is based on their belief that the character and volume of the effluent being discharged does not warrant the range of parameters included in Schedule A.
- 3.2.3. Ground 2.** The appellant suggested that the maximum load ELVs for BOD and Suspended Solids as outlined in Schedule A of the licence are not appropriate given the corresponding ELVs for instantaneous grab samples.
- 3.2.4. Ground 3.** The appellant suggested that the requirement to provide 24-hour composite samples, if requested by UE, is unwarranted and should be removed. The appellant suggests that grab sampling should be sufficient for demonstrating compliance with Schedule A and the costs of installing a composite sampler would be prohibitive and unwarranted.
- 3.2.5. Ground 4.** The appellant suggested that the requirement to sample bi-annually for several parameters at the frequency outlined in Schedule B is excessive and disproportionate to the character of the effluent being discharged. This appeal issue is covered already in Ground 1 above.
- 3.2.6. Ground 5.** The appellant stated in the appeal documentation that they applied to UE for a FOG Licence but were issued with a TE licence. The appellant refers to email communications with UE in relation to the difference between a TE FOG licence and a TE licence. The appellant stated that UE advised them by email on 11th July 2024 that “A fog licence applies to any food service establishment from a small coffee shop to a big hotel and...a trade effluent licence applies to pharmaceutical companies/manufacturing companies.”

4.0 Uisce Éireann response to the grounds of the appeal

- 4.1.** On 7th August 2024 in accordance with Article 17 of the Local Government (Water Pollution) Regulations, 1992 An Bord Pleanála informed Uisce Éireann of the appeal, provided a copy of the appeal documents and requested documents from UE to be submitted within 14 days. In addition, UE were invited to make any submissions they felt necessary to address the grounds of the appeal within 30 days.

- 4.2.** On 6th September 2024 UE responded to the request for documentation and submissions. The response included the documentation requested by the Board and observations relating to the grounds of the appeal. These observations are detailed below.
- 4.3.** UE advised that the parameter BOD is not typically included in FOG licences, but COD is. UE state that the ELV applied to the appellant's TE licence for COD is a less stringent value (4,000mg/L – based on a composite sample) compared to typical values on FOG Licences (1000mg/L). UE also state that suspended solids is also typically included in FOG Licences and the ELV applied to the appellant's TE licence for this parameter is a less stringent value (400mg/L – based on a composite sample). No comparison value was provided.
- 4.4.** UE stated that the parameters listed in Schedule A & B of the granted permit are typical of those contained in TE licences granted to customers operating 'Food Production' businesses as opposed to 'Food Service' establishments such as cafes and restaurants. UE state that the scale of the operation has been considered when categorising the business as a commercial-food production activity and not an industrial-food production activity.
- 4.5.** UE clarified that maximum load emission limit values specified in Schedule A are calculated from composite sampling and flow rates. They state that the requirement to provide flow proportional sampling is only on request and the expectation is that the appellant will be able to demonstrate compliance with their licence parameter concentration ELVs through bi-annual grab sampling.
- 4.6.** UE stated they reserved the right to insist on composite sampling if they have concerns regarding the trade effluent discharge. UE stated this written requirement is standard on all TE licences including TE FOG licences. UE confirmed that the appellant was not currently required to install a flow proportional composite sampler.
- 4.7.** UE stated that the wastewater parameters to be monitored and the associated frequency of monitoring as specified in Schedule A & B of the TE Licence issued to the appellant is typical for a commercial-food production activity. UE stated that at application stage, the appellant was unable to provide details on the exact nature of the businesses using the premises or provide a representative sample of the effluent to be discharged. Therefore, the application was based on a 'desktop study' rather

than measured sample data. UE stated that due to this unknown element to the application, UE have a responsibility to protect the network via routine monitoring requirements which align with requirements placed on other trade effluent producers of a similar scale and nature.

- 4.8. UE reiterated the point that the nature of the effluent could not be described as broadly homogenous and described the characteristics of the discharge as 'unknown'. UE state that the appellant was targeting 30 members in the first year of operation to use their facilities all of whom may discharge a trade effluent of different composition.
- 4.9. UE stated they did not have any record of an email having been sent by them to the appellant on 11th July 2024 stating that "A fog licence applies to any food service establishment from a small coffee shop to a big hotel and...a trade effluent licence applies to pharmaceutical companies/manufacturing companies."
- 4.10. UE confirm that the appellant was informed on 30th January 2024 that it was UE's intention to process the licence application as a trade effluent licence application for a commercial-food production activity and not as an industrial scale "commercial food production" activity as stated in the appeal documents.

5.0 Appellants response to Uisce Éireann's submission

- 5.1. On 18th September 2024 An Bord Pleanála wrote to the appellant and included a copy of UE's submission as outlined above. In accordance with Article 19 of the Local Government (Water Pollution) Regulations, 1992 the appellants were requested to make any submissions or observations before 8th October 2024.
- 5.2. On 8th October 2024 the Board received a submission from the appellant the contents of which are outlined below.
- 5.3. The appellant submitted documents which show that an email was sent to UE (FOG@water.ie) from an unknown (redacted) email address at 12:26 on 11th July 2024 asking what the differences between a trade effluent licence and a trade effluent FOG licence are. The response from UE (FOG@water.ie) at 13:04 on 11th July 2024 states "a fog licence applies to any food servicing establishment from a small coffee shop to big hotel. A trade effluent licence applies to pharmaceutical companies/manufacturing

companies.” The appellant stated that based on the description provided by UE on 11th July 2024, a TE FOG Licence should have been issued for the activity carried out at the appellants facility.

- 5.4.** The appellant made the case that the scale of the activity in the shared kitchen was comparable to that of a hotel or restaurant. They state that the facility is 185m² floor space and has 6 ovens and 7 sinks and the maximum flow rate of 3m³/day specified in their licence is evidence of the small-scale nature of the activity. The appellant suggested the licence should be amended to bring it in line with a FOG licence issued to a restaurant or hotel. They also suggested the issued licence be revoked and replaced with a FOG Licence.
- 5.5.** The appellant stated they accepted that COD is a typical parameter contained in a FOG Licence but considered the inclusion of Toxicity, Total Phosphorous, Total Nitrogen, Sulphate and Chloride as being unnecessary for effluent from food service/preparation establishments.
- 5.6.** The appellant advised that UE were contacted (by persons unknown) on 26th July 2024 to provide an explanation of the wastewater parameters that would be contained in a typical FOG Licence. On 31st July 2024 UE provided an example (to persons unknown) of a typical FOG Licence and Schedule A of that example was provided by the appellant in their submission. This example of a Schedule A included flow rate, temperature, pH, COD, suspended solids, fats, oils & greases and anionic surfactants/detergents. The ELVs listed were concentrations based on instantaneous grab samples only. There were no ELVs for concentrations based on composite samples or no maximum load ELVs. There was a note which stated that UE reserved the right to sample on a flow proportional or composite sampling basis at the premises. The appellant stated that this proved that it is not typical for a FOG licence to include ELVs based on anything other than grab sampling.
- 5.7.** The appellant stated that it is not uncommon for FOG Licence applicants to be unable to confirm the exact type of foods that would be prepared during the application process. They stated that this should not dictate whether a FOG licence or TE licence is more applicable to the facility. They stated that the description of the food preparation facilities on offer should have allowed UE to form an opinion that the

wastewater to be generated was more suitable to FOG Licence conditions than a TE Licence.

6.0 Site Inspection

- 6.1.** On 6th March 2025 I visited the shared kitchen operated by the appellants at North King St., Smithfield, Dublin 7. I inspected the kitchen, food preparation, washing and storage areas inside the building. I also inspected the grease trap and sampling point outside the building.
- 6.2.** I can confirm that the shared kitchen is used by multiple users to prepare a variety of foods which are sold to members of the public.
- 6.3.** I can confirm that the nature and scale of the food preparation in this facility is in line with the details included in the appellants application to Uisce Éireann for a discharge licence and the subsequent submissions made as part of this appeal.

7.0 Discussion on Grounds of Appeal

- 7.1. Ground 1 Parameters in Schedule A** The appellants suggest that the range of parameters included in Schedule A of the licence issued is 'excessive'. They have provided evidence of a 'typical' TE FOG licence which has a reduced number of parameters which they believe is more appropriate to their discharge. The parameters of concern to the appellant are Toxicity, Total Phosphorous, Total Nitrogen, Sulphate and Chloride which are included in Schedule A of their licence but are not on Schedule A of the TE FOG Licence example they provided.
- 7.1.1.** The question of the appropriateness of the parameters included in Schedule A of the granted licence depends on the nature, composition and volume of the effluent leaving the facility, which is a function of the materials used, and processes employed within the site. Throughout the application process, no sampling of effluent from the facility was carried out due to the lack of activity. Uisce Éireann have stated the TE licence was granted due to uncertainty over the effluent type and the need to protect the network.
- 7.1.2.** The appellants provided an example of a FOG Licence which includes the following parameters to be monitored bi-annually: pH, Temperature, COD, FOGs and Anionic

Surfactants/Detergents MBAs. These parameters are typical of a discharge licence issued to a food service establishment where the key parameters of concern are the fats, oils and greases from the perspective of sewer network and treatment facility protection and maintenance. Therefore, I recommend that the following parameters should be excluded from Schedule A as being onerous: toxicity, BOD, total phosphorous, total nitrogen, sulphate and chloride.

- 7.1.3.** Based on my review of the appeal documentation and observations made during the site inspection it is my opinion that the operation of this facility will not generate trade effluents of a nature or volume requiring monitoring conditions above the standard required for restaurants and hotels currently licensed by Uisce Éireann to discharge trade effluent to sewer. I also note the powers available to Uisce Eireann to review the licence at any time and amend conditions as it deems appropriate.

7.2. Ground 2 Maximum Load ELVs in Schedule A

- 7.2.1.** Uisce Éireann clarified that the maximum load ELVs are only to be employed where the site has flow-proportional composite sampling facilities which are not a current requirement of the licence. UE have advised that they may if warranted, request that these monitoring arrangements be put in place by the licence holder. In the interests of clarity, I recommend that these maximum load emission limit values be removed from Schedule A and a note be included referring to Uisce Éireann's right to request flow proportional composite sampling if deemed necessary. This is in line with the sample FOG Licence provided by the appellant.

7.3. Ground 3 Composite Sampling Requirement

- 7.3.1.** Uisce Éireann have clarified that the licence holder is not currently required to provide flow proportional composite samples and bi-annual grab samples are adequate to demonstrate compliance with the ELVs. UE have advised that they may if warranted, request that these monitoring arrangements be put in place by the licence holder. In the interests of clarity, I recommend that these composite sample-based emission limit values be removed from Schedule A and a note be included referring to Uisce Éireann's right to request flow proportional composite sampling if deemed necessary. This is in line with the sample FOG Licence provided by the appellant.

7.4. Ground 4. Bi-annual monitoring for certain parameters

- 7.4.1.** As per 7.1.2. the appellants provided an example of a FOG Licence which includes the following parameters to be monitored bi-annually: pH, Temperature, COD, FOGs and Anionic Surfactants/Detergents MBAs. The appeal relating to monitoring frequency relates to those parameters recommended to be excluded. Therefore, the monitoring frequency of these parameters is no longer an issue.
- 7.4.2.** The appellants have accepted the licence requirements for monitoring frequency of the remaining parameters pH, Temperature, COD, FOGs and Anionic Surfactants/Detergents MBAs are reasonable and appropriate.
- 7.4.3.** Therefore, I recommend that the following parameters should be excluded from Schedule B as being onerous: respirometry, toxicity, BOD, total phosphorous, total nitrogen, sulphate and chloride. In the interests of clarity, I recommend the monitoring frequency of the remaining parameters in Schedule B: pH, Temperature, COD, FOGs and Anionic Surfactants/Detergents MBAs shall be set at bi-annually.

7.5. Ground 5. Trade Emission Licence Vs Trade Emission FOG Licence

- 7.5.1.** Section 16 of the Local Government (Water Pollution) Act, 1977 and 1990 as amended requires that “A person other than a sanitary authority shall not, discharge or cause or permit the discharge of any trade effluent or other matter (other than domestic sewage or storm water) to a sewer, except under and in accordance with a licence under this section granted by the sanitary authority in which the sewer is vested or by which it is controlled.”
- 7.5.2.** There is no distinction in law between a trade emission licence and a trade emission fats, oils and grease (FOG) licence for discharges to a sewer. Uisce Éireann grant both licences under Section 16 of the Local Government (Water Pollution) Act, 1977 and 1990 as amended. Uisce Éireann do provide two different application forms depending on which licence the applicant considers appropriate to their needs.
- 7.5.3.** Fat, oil and grease (FOG) is generated from the preparation of various foods including meats, vegetables, nuts, dairy products, soups, sauces, pasta, poultry, etc. and it arises in catering areas where food is prepared, cooked, stored or served. FOG causes a problem when it is discharged to drains, either during food preparation or in the washing up operation. It combines with other constituents in wastewater, congeals and accumulates in pipelines, service pipes and sewers, resulting in loss of capacity

and blockages. FOG accumulation in wastewater infrastructure also leads to harmful discharges from combined sewer overflow chambers, pumping stations and wastewater treatment plants.

- 7.5.4.** Kitchen wastewater characteristics vary significantly, depending on the Food Service Establishment's size, the different type of meals prepared, and the amount of water used in the cleaning process. These wastewaters are mainly composed of starch, proteins and fats derived from the food preparation and by alkaline and acidic chemicals from the cleaning of pots, pans and cooking equipment (ovens, woks, fryers, etc.). The generated volume of wastewater is also quite variable depending on the type of restaurant, kitchen set-up and size. COD, TSS and fat content (FOG) are the most common parameters found in literature. However, other physical and chemical parameters of note are temperature, pH, oil droplets characteristics and trace elements. (Gurd, 2019)
- 7.5.5.** It is considered reasonable that Uisce Éireann apply a precautionary approach to assigning conditions and parameters to any licence issued. However, this precautionary approach relies on their being an 'unknown' aspect of the application. The licensing authority have a responsibility to gather adequate information during the application process to make an informed decision on the conditions to be included and monitoring parameters required in any licence granted. The appellant communicated on several occasions throughout the application process that the nature and scale of the discharge was typical of a food service establishment such as a hotel or restaurant kitchen. At no stage in the application process did the appellant fail to provide Uisce Éireann with specific information when requested to do so.
- 7.5.6.** Based on my review of the appeal documentation and observations made during the site inspection it is my opinion that this 'unknown' aspect of the discharge nature does not warrant the inclusion of monitoring parameters not typically applied to licences granted to restaurants or hotels to discharge trade effluents to sewer.
- 7.5.7.** Section 17(2) of the Local Government (Water Pollution) Act 1977 and 1990 as amended states:

"Notwithstanding any other provision of this Act or any condition in a licence under section 16, any such licence may be reviewed at any time by the sanitary authority that granted it if—

- (a) the sanitary authority has reasonable grounds for believing that the discharge authorised by the licence is or is likely to be injurious to public health or is or is likely to render the waters to which the sewer concerned discharges unfit for use for domestic, commercial, industrial, fishery (including fish farming), agricultural or recreational uses,
- (b) there has been a material change in the nature or volume of the discharge,
- (c) there has been a material change in relation to the waters to which the sewer concerned discharges,
- (d) further information has become available since the date of the granting of the licence relating to polluting matter present in the discharge concerned or relating to the effects of such matter, or
- (e) the licensee applies to the sanitary authority concerned to review the licence.”

7.5.8. The powers under Section 17 as outlined above allow Uisce Éireann review and amend the conditions of a licence granted under Section 16 at any time. This allows UE to assess the contributions from licensed facilities following a period of monitoring and recommend additional monitoring requirements where change is known to have occurred or where further protections to the wastewater collection network and treatment facilities under its control are deemed necessary.

8.0 Conclusions / Summaries

- 8.1.** In accordance with Section 20 (2) of the Local Government (Water Pollution) Act 1977 and 1990 as amended “An Bord Pleanála, after consideration of an appeal under this section, shall, as it thinks proper, allow or refuse the appeal and may give any direction consequent on its decision that it considers appropriate to the sanitary authority concerned (including a direction that a specified condition be attached to the licence concerned or be amended or deleted) and a sanitary authority shall comply with any such direction.”
- 8.2.** In exercise of the powers conferred on it by Section 20 (2) of the Local Government (Water Pollution) Act 1977 and 1990 as amended I recommend that An Bord Pleanála uphold the said appeal for reasons set out below.

- 8.3.** I recommend that the following monitoring parameters be removed from Schedule A: toxicity, BOD, total phosphorous, total nitrogen, sulphate and chloride. The emission limit values based on composite sampling and maximum load shall also be removed from Schedule A. This in line with the sample FOG licence provided by the appellant.

I recommend that Licence TE-11085-01 shall be revised to include Schedule A as presented in Table 1 as follows:

Table 1. Schedule A

Discharge Point Reference No.	SE1	
Parameter	Emission Limit Values*	
Flow Rate	3 m ³ /day	
Temperature	42°C	
pH	6 – 10 pH units	
	Concentration (Instantaneous Grab)	
COD-Cr	6000	mg/l
Suspended Solids	500	mg/l
Fats, Oils & Greases	100	mg/l
Anionic surfactants/Detergents (MBAs)	100	mg/l

*Note: Grab/spot samples suffice for compliance sampling purposes. Uisce Éireann reserves the right to sample on a 24-hour flow proportional or timed composite sampling basis at the premises.

- 8.4.** I recommend that the following monitoring parameters be removed from Schedule B: BOD, total phosphorous, total nitrogen, sulphate, chloride, toxicity and respirometry.

I recommend that Licence TE-11085-01 shall be revised to include Schedule B as presented in Table 2 as follows:

Table 2. Schedule B

Discharge Point Reference No.	SE1	
Parameter	Monitoring Frequency*	Methodology
Flow Rate	Continuous	As per Condition 2.3
pH	Bi-Annually	As per Conditions 3.3 & 3.4
Temperature	Bi-Annually	As per Conditions 3.3 & 3.4
COD-Cr	Bi-Annually	As per Conditions 3.3 & 3.4
Suspended Solids	Bi-Annually	As per Conditions 3.3 & 3.4

Fats, Oils & Greases	Bi-Annually	As per Conditions 3.3 & 3.4
Anionic surfactants/Detergents (MBAs)	Bi-Annually	As per Conditions 3.3 & 3.4

*Note: Sampling shall take place on alternate week days on a rolling basis to ensure representative samples are obtained for site operations which may vary across the working week.

9.0 Reasons and Considerations

- 9.1. Having regard to the contents of the appeal documentation and having confirmed by site inspection the nature of the activities in the facility, I am satisfied that the nature of wastewater generated in the kitchen operated by the appellant is typical of a restaurant or hotel.
- 9.2. The monitoring parameters and frequencies included in the proposed Schedules A and B (Tables 1 and 2 above) will allow the Sanitary Authority (Uisce Éireann) to adequately monitor wastewaters entering its collection network from the appellants facility.
- 9.3. The sanitary authority (Uisce Éireann) has the necessary powers to review and amend the licence (including monitoring requirements) should evidence suggest the need to.

Finbarr Quigley BSc. M.Sc.
Inspectorate Scientist

12th May 2025