D Kelly & Associates

ENVIRONMENTAL CONSULTANTS

27 Farmleigh Avenue, Stillorgan, Co. Dublin Tel: 01-2880308, Mobile 086-847 5540, e-mail: dkellyassociates@eircom.net

Report to: Ms. Mary Cunneen An Bord Pleanala 64 Marlborough Street,

Dublin 1

ASSESSMENT of Appeal 29S WS0313

Trade Effluent Discharge Licence AIB Bankcentre, Ballsbridge, Dublin 4

Report by: David Kelly B.Sc., M.Sc.

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1. INTRODUCTION

This is a first party appeal (AIB Bankcentre) against the revised trade effluent licence conditions proposed by Dublin City Council (DCC) Sanitary Authority.

Applicant	AIB Bankcentre,Ballsbridege, Dublin 4
Licensing Authority	Dublin City Council
Type of Application	Trade effluent discharge to sewer
An Bord Pleanala Reference	29S WS0313
Type of Appeal	First Party appeal against proposed
	conditions
Request for Review	3 rd November 2009
Dublin City Council Decision Date	24 th May 2010
Appeal Lodgement Date	23 rd June 2010
Date of DCC response to appeal	9 th July 2010

2. BACKGROUND

DCC granted a discharge licence to AIB Bankcentre in March 2006 (Licence Reference PCLS/002/06) to discharge trade effluent to the Council's sewer at Serpentine Avenue, Ballsbridge. The trade effluent consists of catering wastewaters from the staff and visitor canteen facilities (4,800 employees).

On 11th November 2009 AIB applied for a Review of that licence. Upon completion of the Review DCC issued a revised licence, reference number PCLS02/06A. AIB are appealing conditions 17,18, and 19 contending that the revised conditions are unduly stringent for a facility of this type and scale.

3. ON-SITE TREATMENT

On-site treatment is provided prior to discharge to the public foul sewer by means of a Westfalia Separator. The treatment unit is described as consisting of a 20m³ buffer/flow equalisation tank, an agitator, a macerator and chemical addition. Chemical addition includes the use of polyelectrolyte (to coagulate the small

particulates and bind the fat to the precipitated material and to increase particle agglomeration to facilitate solids separation) and chemicals for pH control/neutralisation. A decanter centrifuge is used to separate out the precipitated material from the liquid. The solids and grease so collected are disposed of offsite as a solid waste.

4. ORIGINAL AND PROPOSED LIMITS

The table below sets out the original and revised licence conditions and includes a comparison with the appellant's requested values.

Original and Revised Licence Conditions, Relevant to the Appeal

	ORIGINAL LICENCE PCLS/002/06		REVISED LICENCE PCLS/02/06A		APPELLANTS
					REQUESTED
					VALUES
Parameter	Concentration	Load	Concentration	Load	Concentration (mg/l)
	(mg/l)	(kg/day)	(mg/l)	(kg/day)	
SS	800 24 hr mean	36 kg	800 24 hr mean	16 kg	2,000 Max
	1,000 Max		1,000 Max		
BOD	1000 24 hr	44 kg	1000 24 hr	20 kg	5,000 Max
	mean		mean		
	1,500 Max		1,500 Max		
COD	3,000 24hr	135 kg	3,000 24hr	60 kg	8,000 Max
	mean		mean		
	4,500 Max		4,500 Max		
Volume	45m ³ /d	1	20m ³ /d	1	

5. APPEAL ISSUES

AIB Bankcentre, through their environmental engineering consultants AWN, are appealing the conditions relating to the concentration limits (daily means and maxima) for SS, BOD and COD (See Table above). These values relate to Conditions 17, 18 and 19 of the proposed revision.

5.1. Assessment

Essentially the arguments on both sides come down to Concentration and Volume.

5.1.1. Concentration Values

The central point made by AWN in their appeal is that in their view their requested values are a more accurate reflection of canteen wastewater values as likely to be encountered elsewhere from canteen facilities of similar nature and scale.

DCC in their response point out that licence monitoring by them over many years of numerous other similar facilities provide the basis for their limits. Furthermore, and in my view importantly, monitoring of the original licence PCLS/002/06 over a number of years yielded an average suspended solids value of 762mg/l, a value that is within the 800 mg/l average value proposed. Monitoring for COD over the same period gave an average COD value of 941 mg/l, a value that is comfortably below the 3,000mg/l COD limit proposed. Similarly in the case of BOD the average value at 481mg/l is well within the proposed limit.

DCC contend that the Appellant's requested concentration value of 8,000mg/l COD "would put unacceptable pressure on the treatment plant" (Ringsend WWTP). I do not believe this to be the case. Clearly a COD value of that concentration originating from the Bankcentre would be highly diluted once in admixture within the total flow entering the City and suburban sewer network prior to entering the treatment plant. Consequently I do not regard this point as being of central importance.

AWN make the point that the numbers served by the canteen has increased since the original licence and that an increase in wastewater concentrations is needed to cater

for this. I see no reason why this should be the case. An increase in the population served at the bank (and even if it were to be sustained in the present banking employment climate) would simply give rise to an increase in volume, not concentration. In this regard I note (below) that the volume limit is not being appealed.

Conclusion on Concentration Values

The DCC case, particularly in the light of monitoring results at the Bankcentre over a number of years, that their proposed values reflect the norm for large scale catering facilities is both credible and reasonable. Also the fact that the wastewater undergoes both flow balancing and chemical treatment prior to discharge makes it all the more likely that the DCCs limits can be consistently met.

5.1.2. Volume

While AWN make a number of references to the significant reduction in the daily permissible volume of discharge (down from $45m^3/d$ to $20m^3/d$) and the impact that will have on the daily contaminant load (kg/d) allowance they are not specifically appealing the volume limit. Were the volume limit to require water conservation measures beyond the norm then it would have implications for concentration values and these would come under pressure i.e. concentrations would likely increase.

Conclusions on Volume

On the basis that the 20m³/d volume limit is the value provided by the applicant in the Licence Application and furthermore is not now being appealed I must conclude that the value is not only acceptable to the applicant but that the original 45m³/d was in excess of actual requirements.

6. RECOMMENDATION

I recommend that Dublin City Council's proposed licence (reference number PCLS/02/06A) be upheld.

REASON

Having regard to the information contained in the documentation submitted with the licence application and appeal, it is considered that the proposed discharge licence conditions are necessary for protecting the fabric and operation of the public foul sewer network, the subsequent treatment at the Ringsend urban wastewater treatment plant, and is consistent with the provisions of *Council Directive* 91/271/EEC concerning urban wastewater treatment.

David Kelly

1st September 2010