



Mercury Renewables (Jennings O'Donovan)

# Firlough Green Hydrogen

Preliminary Discharge &  
Assimilative Capacity Assessment  
(pDACA)

Project no. 603676 (07) pDACA

**RSK**

## RSK GENERAL NOTES

---


**Project No.:** 603676

**Title:** Preliminary Discharge & Assimilative Capacity Assessment (pDACA)

**Client:** Mercury Renewables

**Office:** RSK Dublin

**Status:** (06)

Author	Sven Klinkenbergh	Technical reviewer	
Signature		Signature	
Date:	29/06/2023	Date:	

Revision control sheet		
Revision ref.	Date	Reason for revision
00		Initial Draft
01		Revised Draft
02	17/02/2023	Issue Final
03	06/05/2023	Revision
04	02/06/2023	Revision
05	28/06/2023	Revision
06	29/06/2023	Revision

RSK (Ireland) Ltd (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the express agreement of the client and RSK. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report assumes that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of RSK and the party for whom it was prepared.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

# CONTENTS

---

<b>1</b>	<b>INTRODUCTION .....</b>	<b>6</b>
1.1	Scope of Work.....	6
1.2	Statement of Authority .....	6
1.3	Sources of Information.....	7
1.4	Limitations .....	7
<b>2</b>	<b>METHODOLOGY .....</b>	<b>8</b>
2.1	Watercourse Nomenclature .....	8
2.2	Monitoring – Timing .....	8
2.3	Monitoring – Locations.....	8
2.4	Water Sampling & Field Hydrochemistry .....	8
2.5	Laboratory Analytical Hydrochemistry .....	9
2.6	Reported River Water Quality .....	9
2.7	Preliminary River Flow Data .....	9
2.8	Groundwater Quality & Levels .....	9
2.9	Conceptual Process Water Demand and Wastewater Treatment Assessment .....	10
2.10	Preliminary Effluent Discharge & Assimilative Capacity Assessment.....	10
2.10.1	Assessment of Variable Conditions.....	12
2.11	Consultation Meeting with EPA .....	13
<b>3</b>	<b>RESULTS &amp; INTERPRETATION .....</b>	<b>15</b>
3.1	Catchments & Surface Water Features.....	15
3.1.1	WFD Catchments .....	15
3.1.2	Subject River / Catchment .....	15

3.1.3	Neighbouring River/s / Catchment .....	16
3.2	River Flow Data.....	17
3.2.1	Available and Adapted River Flow Data .....	17
3.2.2	Baseline Sampling & Flow Measurements .....	19
3.2.3	Rainfall Data.....	19
3.2.4	Anecdotal Data .....	20
3.2.5	Groundwater Data .....	20
3.3	River Hydrochemistry .....	21
3.3.1	Water Framework Directive.....	21
3.3.2	Field & Analytical Surface Water Quality.....	21
3.4	Process Wastewater Quality .....	22
3.5	Process Wastewater Discharge Flows .....	23
3.6	Preliminary Assimilative Capacity Assessment .....	25
3.7	Results Interpretation & Commentary .....	26
<b>4</b>	<b>CONCLUSIONS .....</b>	<b>28</b>
<b>5</b>	<b>DISCUSSION &amp; RECOMMENDATIONS.....</b>	<b>31</b>
5.1	Process Source Water, Wastewater Management & Discharge.....	31
5.2	Detailed Discharge & Assimilative Capacity (DACA).....	34
5.3	Detailed Monitoring Plan .....	34
5.4	Detailed Design & Specification.....	36
<b>6</b>	<b>REFERENCES.....</b>	<b>37</b>

## LIST OF TABLES

Table 1 - Hydrotool River Flow Data (34-1372)

## LIST OF PLATES

Plate 1 - Subject HYDRO Catchment 34\_622

Plate 2 – Neighboring HYDRO Catchment 34\_1372

Ref. 603676 pDACA 06

Mercury Renewables

PDACA – Firlough Green Hydrogen, Co. Sligo

Plate 3 - Mapped Springs (Ref. Minerex 3131-043 rev1)

Plate 4 – Aquifer Vulnerability over HYDRO Catchments (Ref. EPA / GSI, 2022)

## **LIST OF APPENDICES**

### Appendix A – Figures

Figure 1 - Site Location & Surface Water Discharge Data

Figure 2 - Proposed Development Layout

Figure 3 - SW Monitoring Locations

Figure 4 – Conceptual Process & Treatment Train Flow Diagram

### Appendix B – Groundwater & Surface Water Database

### Appendix C – Preliminary Assimilative Capacity Assessment

# 1 INTRODUCTION

---

RSK Ireland was commissioned by Mercury Renewables to carry out a Preliminary Discharge & Assimilative Assessment for wastewater discharge associated with the Proposed Development i.e., Hydrogen Plant.

The Hydrogen Plant Site is situated in Co. Sligo, on the Co. Sligo and Co. Mayo border, 5.5 kilometres west of Bunnyconnellan, Co. Mayo

This report is accompanied by the following Appendices;

Appendix A – Figures

- Figure 1 - Site Location
- Figure 2 – Proposed Development
- Figure 3 – Site Location & Surface Water Baseline Locations
- Figure 4 – Conceptual Process & Treatment Train Flow Diagram

Appendix B – Groundwater, Surface Water & Wastewater Database

Appendix C – Assimilative Capacity Calculations

The Proposed Development and specifically the Hydrogen Plant is described in EIAR Chapter 2: Project Description (Figure 2 - Proposed Development Layout).

## 1.1 Scope of Work

The scope of work completed under this report includes;

- Establishing a good understanding of the wastewater streams, their volume / discharge rates, and likely contaminant loading.
- Identify the potential variability in wastewater volumes, discharge rates and contaminant loading.
- Evaluate and propose conceptual wastewater management, treatment and discharge of wastewater at the site.
- Estimate and qualify likely impact of discharging to receiving surface waters.
- Consider and evaluate potential alternatives.
- Identify significant data gaps if applicable.
- Make recommendations for the proposed development in terms of further assessment required, monitoring, and wastewater management.

## 1.2 Statement of Authority

RSK (Ireland) Ltd. (RSK), part of RSK Group, is a consultancy providing environmental services in the hydrological, hydrogeological and other environmental disciplines. The company and group provide consultancy to clients in both the public & private sectors. More information can be found at [www.rskgroup.com](http://www.rskgroup.com). The principal members of the RSK EIA team involved in this assessment include the following persons;

- Project Manager & Lead Author: Sven Klinkenbergh – B.Sc. (Environmental Science), P.G. Dip. (Environmental Protection) – Principal Environmental Consultant with c. 10 years' experience in hydrology, hydrogeology and geology disciplines.

### **1.3 Sources of Information**

The following sources of information were reviewed:

- EPA Maps (Accessed December 2022) (EPA, 2022)
- EPA HydroTool (Accessed December 2022) (EPA, 2022)
- EPA Hydronet (Accessed December 2022) (EPA, 2022)
- GSI Maps (Accessed December 2022) (GSI, 2022)

### **1.4 Limitations**

RSK cannot be held responsible for any omissions, misrepresentations, errors for inaccuracies with the supplied information. New information, revised practices or changes in legislation may necessitate the re-interpretation of the report in whole or in part.

All opinions expressed are based upon current design standards and policies in force at the date of this report. These standards may be subject to change with the passage of time.

The opinions expressed herein are intended to provide general guidance as to how a problem related to a particular development might be resolved. Given the paucity of the original information, and the often-indirect nature of information received, they should not be relied upon as absolute or definitive guidance as to any particular solution. Such conclusions can only sensibly be arrived at upon detailed design.

As a consequence of the above, RSK. will not be held liable for any consequential losses, howsoever caused, as a consequence of inaccurate missing, incomplete, or erroneous data contained in this report, nor any data capable of being subject to variable interpretation by means of its generalised nature.



## 2 METHODOLOGY

---

### 2.1 Watercourse Nomenclature

Catchment and watercourse / surface water nomenclature is in line with names stated on EPA/WFD maps and datasets.

Non-mapped features follow the nomenclature of the source for information including appended reports.

### 2.2 Monitoring – Timing

Monitoring included initial site walkover and 1 no. round of surface water baseline sampling round.

Initial site walkover was conducted on 27<sup>th</sup> October 2022.

Surface Water Monitoring Event no. 1 was conducted on 2<sup>nd</sup> December 2022

### 2.3 Monitoring – Locations

Baseline sampling was carried out at 2 no. locations;

- FHP-SW1 (Upstream)
- FHP-SW2 (Downstream)

Surface water monitoring locations are presented in **Appendix A – Figure 3**.

### 2.4 Water Sampling & Field Hydrochemistry

Sampling was carried out in line with RSK Ireland standard practices and quality control checks.

During the sampling event, the physical characteristics of the river channel, and associated feeder drains (if applicable), as well as river water depth (3 no. locations), and estimated velocity were recorded.

Field hydrochemistry was assessed during the sampling event. The following field hydro chemical parameters were assessed and recorded.

- Colour
- Estimated Total Suspended Solids
- Odour
- Obvious Contaminants (e.g. Hydrocarbon)
- Temperature
- pH
- Electrical Conductivity

## 2.5 Laboratory Analytical Hydrochemistry

Surface water samples obtained during the monitoring event were sent to an accredited laboratory for analytical hydro chemical analysis.

Parameters analysed included key parameters with relevant Environmental Quality Standards (EQSs) associated, including, inter alia;

- Biological Oxygen Demand (BOD)
- Total Suspended Solids (TSS)
- Nutrients - N (Nitrogen) and P (Phosphorous) compounds.
- Metals

Full parameter list is presented in Appendix B – Groundwater & Surface Water Database.

## 2.6 Reported River Water Quality

Desktop assessment included consultation with EPA, GSI and other relevant opensource maps. Data available on surface and groundwater quality including WFD 2016-2021 Status and latest cycle Risk classifications, etc.

## 2.7 Preliminary River Flow Data

Subject river discharge rate ( $Q_R$ ) was assessed by on site and desktop assessments.

On site flow or discharge rate assessments were conducted as part of Surface Water (SW) sampling event (02/12/2022). Data obtained during the SW sampling event included data on depth, width, velocity (measured by float distance over time, average of three measurements), qualification of river bed characteristics and friction coefficients. Sectional area of the river water at the sampling point is calculated

$$((Depth\ 1 * (Width / 3))/2) + (Depth\ 1 * (Width / 3)) + ((Depth\ 1 * (Width / 3))/2)$$

$$Sectional\ area\ (m^2) * Velocity\ (m/s) = Discharge\ (Q)\ (m^3/sec).$$

Note: This is considered in low accuracy discharge assessment undertaken at a single point in time.

Desktop assessment included consultation with EPA Water, EPA HydroTool and EPA Hydronet maps, assessing data availability associated with the subject catchment, and to ascertain the Q95%ile discharge rate for the subject river, and to infer a likely Q95%ile discharge rate for the subject river at the approximate location of the proposed discharge point.

## 2.8 Groundwater Quality & Levels

Available data obtained as part of the Minerex Pump Test (Minerex Environmental, 2023, Groundwater Supply Report) includes results of detailed hydrogeological desktop assessment, mapping of hydrogeological features including springs, borehole geological logging, long duration water logging, and groundwater environmental and groundwater characterisation analytical laboratory data.

Ref. 603676 PDACA 05

Mercury Renewables

PDACA – Firlough Green Hydrogen, Co. Sligo

Groundwater hydro-chemical data is used by the design team to provide indicative wastewater quality, and for interpretation of surface water hydro-chemical quality and hydrological / discharge properties of the subject river.

## **2.9 Conceptual Process Water Demand and Wastewater Treatment Assessment**

The Hydrogen Plant will require volumes of treated water for use. The proposed facility design team (Black and Veatch) have provided indicative predictive wastewater quality data, and predicted water demand and peak production flow rates. The Hydrogen Plant will require volumes of wastewater to be treated water for discharge to surface waters. Using data provided (Black and Veatch etc) this report assesses the water balance, and treatment train required at the site in order to achieve minimal impact to the receiving environment.

Due to the uncertain nature of the wind resource (among other factors) that determines renewable energy production from a project such as the Wind Farm, the industry uses probability-based forecasting methods to estimate future production.

These methods are presented as probability density functions, for example a normal distribution or bell curve. The P50 probability representing an energy generation forecast that the relevant wind farm will at least achieve 50% of the time. As the mean average, this represents the most likely outcome for the Wind Farm.

Conversely, assuming the Hydrogen Plant would operate at 100% output for a year carries a probability of 0% as the Wind Farm will not operate at 100% utilisation for a full year based on collected wind data supplemented with long term data sets and due to normal operation and maintenance down time requirements at either the Wind Farm or the Hydrogen Plant.

Figures used in this document on process water, and wastewater discharge requirements of the Hydrogen Plant, are based on P50 production values of the Wind Farm.

## **2.10 Preliminary Effluent Discharge & Assimilative Capacity Assessment**

The Hydrogen Plant will discharge treated trade effluent to surface waters. The discharge of trade effluent is a licenced activity, and considering the nature and scale of the Hydrogen Plant the proposed activities are likely to be listed on the First Schedule of the EPA Act. In the event that an IE licence is not required, at minimum the Hydrogen Plant will require a Section 4 Water Protection Act Discharge Licence from the local authority.

Anticipating the requirement for a licence application, this report assesses the likely / predicted effluent discharge quality, quantity or discharge rate, and the assimilative capacity of the receiving surface water, as well as screening requirements set out in relevant guidance for the purposes of applying for licence to discharge to surface waters.

Relevant guidance includes *EPA (2018) Licence Application Form Guidance – Industrial Emissions (IE), Integrated Pollution Control (IPC) and Waste*. This guidance document Ref. 603676 PDACA 05

includes for the assessment and characterisation of emissions, namely; Emissions to Surface Water. The guidance lists items of information required for completing application templates, including requirements to establish the nature and quality of the emission or effluent. For the purpose of this preliminary assessment the following items are sited (this does not detail the full list of requirements, the following is sited for the purposes of assessing the potential impact as part of EIA);

*Within the template document you are required to provide emission point details including:*

- 1. Details of the emission source.*
- 2. The typical days usage/year.*
- 3. The measures to reduce/minimise/prevent emissions (where an environmental quality standard consideration require measures stricter than BAT the measures are to be included in bold)*
- 4. The receiving water type (River, 'Ditch', 'Estuary', 'Lake', 'Land Drain' or 'Other' (where 'Other' is selected please enter a description).*
- 5. The receiving water code.*
- 6. Identification of the relevant parameters emitted to water*
- 7. The proposed emission limits and sampling/monitoring arrangements.*

*To identify the relevant chemical parameters you are required to consider:*

- 1. Substances listed in the Schedule of EPA (Industrial Emissions)(Licensing) Regulations 2013, S.I. No. 137 of 2013.*
- 2. The fate of materials/substances, intermediates, products and by products used or produced through the process particularly substances of very high concern, substances carrying the Hazard statement H400 to 413 (hazardous to the aquatic environment) and hazardous substances with damaging effects on sensitive plants and ecosystems.*
- 3. Any reaction substances likely to appear as a result of treatment or natural breakdown processes with damaging effects on sensitive plants and ecosystems.*
- 4. Any substances with the potential to cause odour nuisance off site.*
- 5. List I and List II substances listed in the Annex to EU Directive 2006/11/EC (as amended).*

*To determine the emission levels the applicant must consider the following:*

- 1. Environmental quality standards and objectives.*

The EPA 2018 guidance lists other items to consider and assess, including developing detailed procedures in line with EPA Best Available Techniques (BAT). These items are not addressed under this report. However, under the scope of this report, and to assess the potential impact for the purposes of EIA, this report will also look at guidance relating discharge licence applications to local authorities which sets out methodologies for assessing and qualifying the assimilative capacity of the receiving surface water.

It is noted that the receiving river is on the Co. Sligo and Co. Mayo Border, however this preliminary assessment of key criteria including assimilative capacity calculations has been carried out following Sligo County Council (SCC) (2011) *Guidance on Applying for a Discharge Licence to Surface Waters.*

Information required will include;

1. *Plans and other particulars to describe the premises, drainage system and any works, apparatus or plant from which the effluent is to be discharged;*
2. *Identify the waters to which the discharge is to be made and the point of discharge;*
3. *Particulars of the nature, chemical composition, anticipated temperature, volume and rate of discharge;*
4. *Details of the proposed method of any treatment of the effluent and the period or periods during which the effluent is to be discharged;*
5. *A general description of the process or activity giving rise to the discharge;*
6. *The results of any investigation made into the impact of the discharge on the receiving waters;*
7. *Particulars of the quality of the receiving waters. This is to include as a minimum, a description of the chemical and bacteriological condition of the receiving water at the point of discharge.*
8. *Particulars of the volume and flow rate of receiving waters, indicating 95%ile flow and Dry Weather Flow (DWF);*
9. *Details of the effects of the discharge on the receiving waters, which is to address the chemical and ecological qualities of the receiving water.*

*Other information required will include;*

1. A biological quality assessment / ecological assessment of the receiving waters;
2. Toxicity testing of the effluent;
3. Details of proposals for dealing with sludge.

SCC *Guidance on Applying for a Discharge Licence to Surface Waters* provides manual *Appendix C – Assimilative Capacity and Mass Balance Calculations* which details procedures to calculate;

- Assimilative Capacity for pollutant.
- Percentage of Assimilative Capacity used based on expected conditions.
- Mass Balance for estimating pollutant impact downstream based on expected conditions.

These calculations are used to preliminary assess the assimilative capacity of the subject river to receive treated trade effluent without significantly adversely affecting the Environmental Quality Standards (Surface Water Regulations reference limits) and Water Framework Directive (WFD) status of the receiving surface water network.

### **2.10.1 Assessment of Variable Conditions**

In order to assess the likely impact of the proposed discharge, guidance sited stipulates that the assimilative capacity must be assessed using representative

Q95%ile and Dry Weather Flow Rate, the latter being 'worst case' scenario.

Q95%ile represents flow in cubic meters per second which was equalled or exceeded 95% of the flow record, and is a significant low flow parameter particularly relevant in the assessment of river quality consent conditions.

Due to limited available data on river discharge rates at the Hydrogen Plant Site, and in line with relevant guidance, the discharge values for the subject river will be inferred using data available for suitable neighbouring catchments. Furthermore, this assessment will look at variable effluent and river discharge rates under 3 no. scenarios, including the Base Case on which the conclusion of this report are based.

- Scenario A - Using Inferred Constant River HHYDRO Tool Q95%ile and Monthly Average Discharge Rate
- Scenario B - Using Inferred Variable River Q95%ile (HHYDRO Tool Derived) and Monthly Average Discharge Rate, combined with Wastewater Storage and NO Restricted Discharge Rate
- Scenario C (Base Case) - Using Inferred Variable River Q95%ile (HHYDRO Tool Derived) and Monthly Average Discharge Rate, combined with Wastewater Storage and WITH Restricted Discharge Rate

## 2.11 Consultation Meeting with EPA

The project team engaged with the EPA and a pre-application consultation meeting which took place on the 29<sup>th</sup> March 2023. The Hydrogen Plant water balance, treatment and discharge was discussed. Main points raised include the following in summary;

- The EPA noted that the proposal to abstract water from the ground for the hydrogen plant would be subject to the Water Environment (Abstractions and Associated Impoundments) Act 2022 given the volume of water required (By law, if you abstract 25 cubic meters (25,000 litres) of water or more per day, you must register this abstraction with the EPA).
- The EPA noted that an Industrial Emissions Licence would be required for the hydrogen plant under the Industrial Emissions Directive.
- The EPA noted that it is likely that the production of hydrogen would come under classification 5.13 of the First Schedule of the EPA Act 1992 as amended.
- The EPA noted that BAT (Best Available Techniques) and BREF (Best Available Technique Reference Document) details would need to be included in the licence applications.
- The EPA noted that the constructed wetlands and vegetated swales must be sealed by an impermeable liner.
- The EPA noted that the discharge design must be based on a worst-case scenario (i.e. dry weather flow).
- The EPA noted that there need to be separate sampling points for the process

and foul water treatment systems.

These items have been considered in the preliminary design and in this assessment of the Hydrogen Plant in terms of identifying any likely significant impacts at EIA stage.

### 3 RESULTS & INTERPRETATION

#### 3.1 Catchments & Surface Water Features

##### 3.1.1 WFD Catchments

WFD Catchment = 34, Moy & Killala Bay

WFD Sib-Catchment = 34\_11, Leaffony\_SC\_010

WFD River Sub Basin = RATHROEEN STREAM\_010

##### 3.1.2 Subject River / Catchment

EPA HydroTool Catchment = 34\_622

Subject River = DOOYEAGHNY\_or\_CLOONLOUGHAN\_010

HYDRO Catchment Data = No

National Water Monitoring Station Data =

Yes, mapped station, *DOOYEAGHNY\_or\_CLOONLOUGHAN - Interstitial, 1st Br u/s from May\_34 R conf.* However, no data available (Contact EPA / County Council).



Plate 1 - Subject HYDRO Catchment 34\_622





## 3.2 River Flow Data

### 3.2.1 Available and Adapted River Flow Data

Guidance on calculating the assimilative capacity indicates that the EPA Hydrotool data from a neighbouring catchment can be used, provided the catchment size and soils types are similar (**App A – Figure 1 - Site Location & SW Discharge Data**).

The HYDRO tool river flow data available in the neighbouring catchment is presented in the **Table 1**. The HYDRO Node associated with the neighbouring catchment is positioned at the outfall of the catchment, therefore represents the entire or 100% HYDRO catchment. When using the below data to infer a river flow (Q) rate at the proposed site Discharge Point (DP) of the Hydrogen Plant Site, it is important to consider the position of the DP relative to the position of the HYDRO node being used to infer data.

The DP is position approximately 66% upstream of the HYDRO catchment outfall / Hydrotool data node, i.e. approximately 33% of the subject catchment is available to contribute to river discharge at DP.

**Table 1 – HYDRO Catchment & Adapted Data**

HYDRO Catchments	Site		Neighbour		Neighbour
RWSEG_CD	34_622		34_1372		34_1372
NODE_ID	34_622_6		34_1372_2		34_1372_2
CatchmentArea_km2	6.281		5.254		5.254
National Water Monitoring Stations	Yes		No		No
Data	No (?)		n/a		n/a
River Flow Estimates - Hydrotool	No		Yes		Hypothetical
Location in catchment / Area %	n/a		100%		33%
<b>Hydrotool Data</b>					
RWSEG_CD			34_1372		34_1372
CatchmentArea_Km2			5.254		1.73382
Easting			126220		Site
Northing			324920		Site
FARL			1	33%	0.33
NATQ1 (m³/s)			0.551	33%	0.18183
NATQ5 (m³/s)			0.346	33%	0.11418
NATQ10 (m³/s)			0.257	33%	0.08481
NATQ20 (m³/s)			0.172	33%	0.05676
NATQ30 (m³/s)			0.128	33%	0.04224
NATQ40 (m³/s)			0.099	33%	0.03267
NATQ50 (m³/s)			0.077	33%	0.02541
NATQ60 (m³/s)			0.06	33%	0.0198
NATQ70 (m³/s)			0.046	33%	0.01518
NATQ80 (m³/s)			0.032	33%	0.01056
NATQ90 (m³/s)			0.02	33%	0.0066
NATQ95 (m³/s)		100%	0.014	33%	0.00462
NATQ99 (m³/s)			0.008	33%	0.00264
NATAMF (m³/s)			0.116	33%	0.03828
NATMMF1 (m³/s)			0.205	33%	0.06765
NATMMF2 (m³/s)			0.168	33%	0.05544
NATMMF3 (m³/s)			0.126	33%	0.04158
NATMMF4 (m³/s)			0.092	33%	0.03036
NATMMF5 (m³/s)			0.07	33%	0.0231
NATMMF6 (m³/s)			0.056	33%	0.01848
NATMMF7 (m³/s)			0.048	33%	0.01584
NATMMF8 (m³/s)			0.062	33%	0.02046
NATMMF9 (m³/s)			0.063	33%	0.02079
NATMMF10 (m³/s)			0.105	33%	0.03465
NATMMF11 (m³/s)			0.171	33%	0.05643
NATMMF12 (m³/s)			0.191	33%	0.06303

HYDRO Catchments	Site		Neighbour		Neighbour
RAINFALL_SAAR			1102.212	33%	363.7298235
EVAPOTRANSPIRATION			485.083	33%	160.0775372
POORLYDRAINED			0.814	33%	0.268502913
PEAT			33.781	33%	11.14759471
CONDUIT_KARST			0	33%	0

The NATQ95%ile is reported to be 0.014 m<sup>3</sup>/sec, or 14 l/sec. Assuming (inferred estimate) 33% of that discharge flow rate is indicative of the NATQ95%ile at the proposed DP, a Q95%ile value of 0.0046 m<sup>3</sup>/sec, or 4.6 l/sec will be used for this assessment.

### 3.2.2 Baseline Sampling & Flow Measurements

Peak river flow measurements / estimates at SW sampling locations are presented in Appendix B – Groundwater & Surface Water Database, and summarised as follows;

- FHP-SW1 (02/12/2022) = 32.3 l/sec
- FHP-SW2 (02/12/2022) = 65.8 l/sec

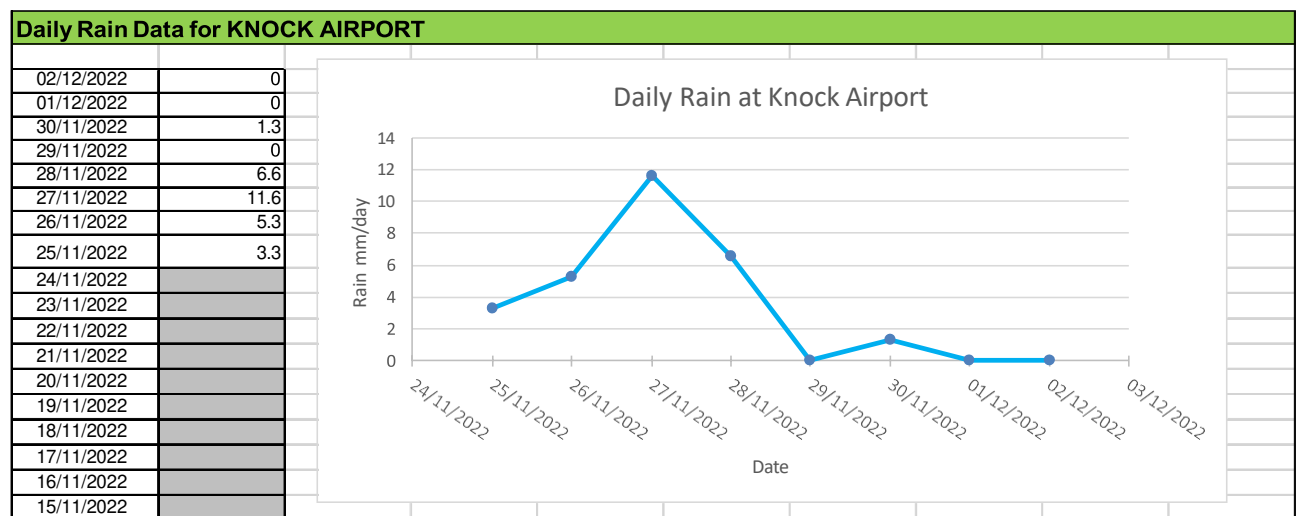
Weather conditions on the day of sampling (02/12/2022) and a number of days preceding the event were dry. However, the two months preceding the event were exceptionally wet, as presented in the following tables.

### 3.2.3 Rainfall Data

Rainfall data for the days and months preceding the Surface Water (SW) sampling event is presented in the following tables.

Monthly Long Term Average (LTA) rainfall is also presented, this data is included and used in preliminary assimilative capacity assessments presented in Appendix C – Preliminary Assimilative Capacity Assessment.

**Table 2 – Daily Rain at Knock Airport (Up to 02/12/2022)**



**Table 3 - Monthly Rain Data for Knock Airport (Ref. Met Eireann).**

Monthly Rain Data for KNOCK AIRPORT up to 21-dec-2022													
Total rainfall in millimetres for KNOCK AIRPORT													
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2022	72.7	186.8	61.5	77.2	101.7	128.8	39.8	59.4	97	217.5	172.8	35.3	1250.5
2021	129.3	118.7	118.9	41.6	115.6	50.2	122.8	117.7	147.7	166.4	105.7	129.9	1364.5
2020	122.5	277.4	117.6	21	30.8	126.8	159.6	104.9	75.4	178.8	129.3	161.8	1505.9
2019	93.2	99.2	182.4	96.5	78.1	114.2	85.9	207.6	116.7	104.6	103	174	1455.4
LTA	135.4	102.9	118.1	81.6	92	91.5	95.7	107.9	111.3	141.3	134.2	141.4	1353.3

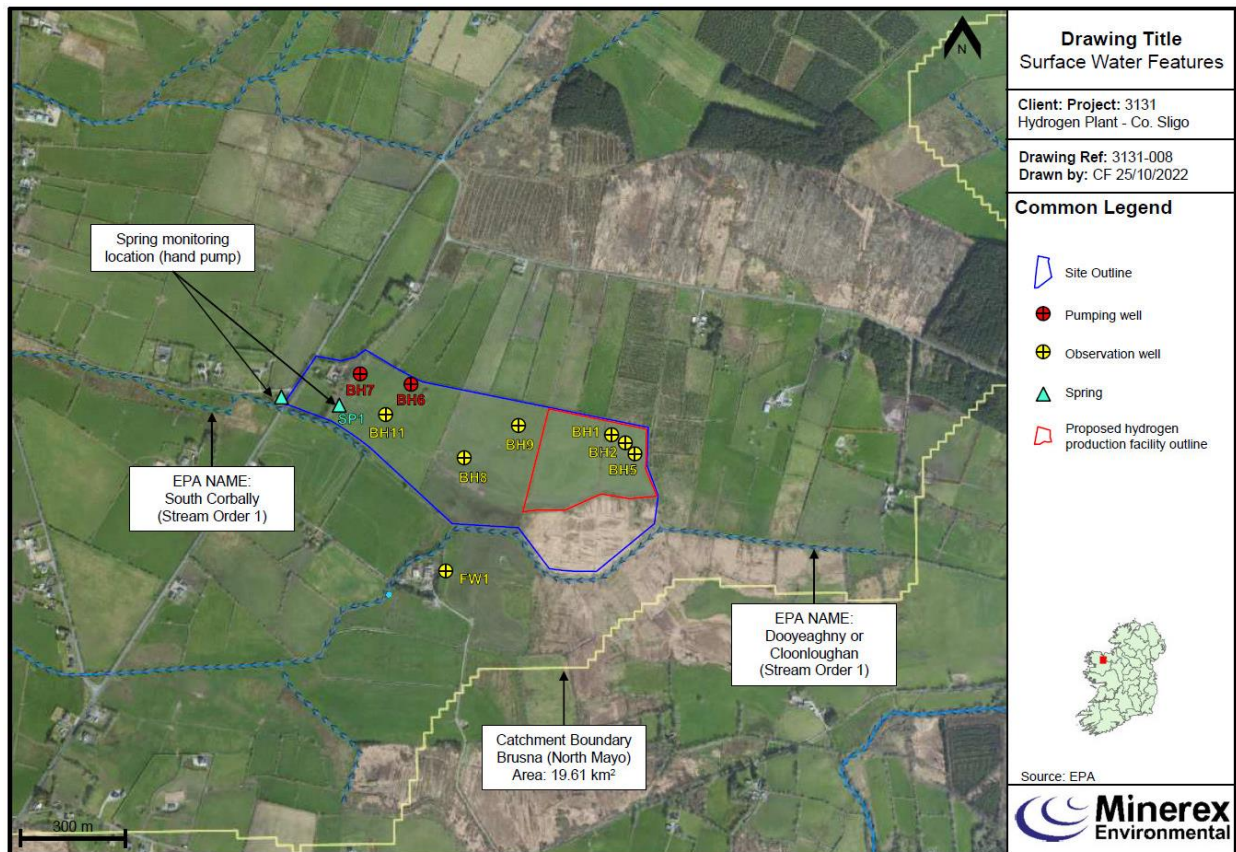
### 3.2.4 Anecdotal Data

Anecdotal evidence (Pers. Comm. Land Owner) suggests that the subject river, Dooyeaghny or Cloonloughan Stream is in constant flow year round.

### 3.2.5 Groundwater Data

Review of available data, including recent Minerex (2022) Groundwater Supply Assessment (Ref. 3131-043 Rev1)

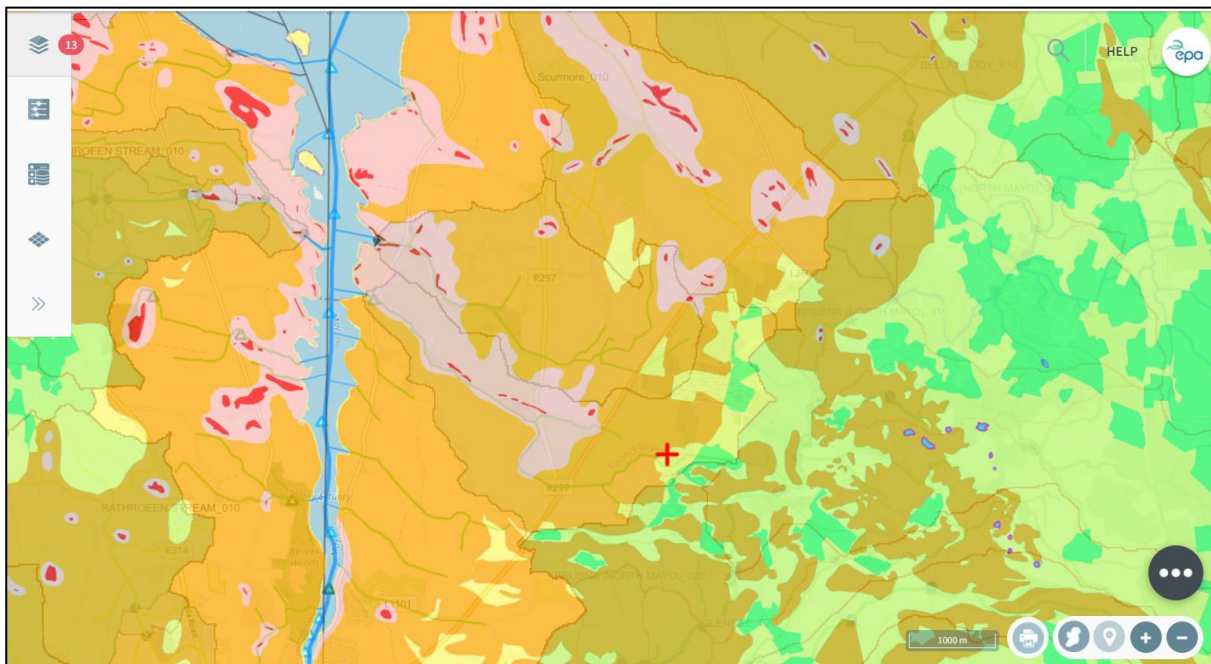
*The site is located in the Moy and Killala Bay catchment, Leaffony sub catchment and the Dooyeaghny or Cloonloughan sub basin. The Dooyeaghny or Cloonloughan stream flows westwards along the southern boundary of the site. A groundwater spring SP1 rises at the south west corner of the site. This is likely one source of the South Corbally stream which is mapped as rising at the south west boundary of the site flowing westwards before joining the Dooyeaghny or Cloonloughan stream which eventually flows to the Moy.*



**Plate 3 - Mapped Springs (Ref. Minerex 3131-043 rev1)**

The SP1 and SP2 springs discharge to the Corbally river, not the subject river, however the presence of springs in combination with; anecdotal evidence of constant flow, and surface water hydrochemistry (namely elevated conductivity), the river discharge is likely comprised of a relatively steady groundwater fed baseflow.

Note on Aquifer Vulnerability. Between the two HYDRO catchments under review (subject and neighbour) there is a notable difference in mapped aquifer vulnerability, particularly in the top c. 33% of the subject catchment. The general area of catchments downstream of the proposed DP range in extreme to high vulnerability. The headwater 33% of the subject catchment is mapped as ranging from high to low vulnerability. This would likely impact on the actual flow duration curve for the subject catchment, and potentially a more buffered response to rainfall compared to that of the neighbouring catchment i.e. a more constant flow rate with additional infiltration and groundwater flow times, compared to the neighbouring catchments which could be more ‘flashy’ than the subject catchment and therefore could potentially have a lower Q95%ile flow rate as a result.



**Plate 4 – Aquifer Vulnerability over HYDRO Catchments (Ref. EPA / GSI, 2022)**

### 3.3 River Hydrochemistry

#### 3.3.1 Water Framework Directive

Subject River = DOOYEAGHNY\_or\_CLOONLOUGHAN\_010

WFD Status 2016-2021 = Good (Assessment Technique: Modelling)

WFD Risk 3<sup>rd</sup> Cycle = Review

River Q Values = No Data

#### 3.3.2 Field & Analytical Surface Water Quality

Field and laboratory analytical analysis data for samples obtained during Surface Water (SW) sampling events are presented in Appendix **B** – Groundwater & Surface Water Database.

Laboratory results for SW samples obtained at FHP-SW1 and FHP-SW2 (02/12/2022) have been screened against relevant reference limits including Surface Water Regulations for Good water quality (95%ile).

Results indicate good water quality with the exception of Nitrates (c. 4.1 mg/l) which exceeds the SW Regs Good (95%ile) reference limit of 2.6 mg/l.

Electrical Conductivity (EC) is noted to be elevated (c. 596 uS/cm). This is not in exceedance of reference limits, however it is likely an indication that the subject river is potentially impacted by poor quality agricultural runoff, and/or receiving a relatively high volume of groundwater discharge i.e. groundwater fed river.

### 3.4 Process Wastewater Quality

Hydrochemical data for groundwater samples obtained by Minerex for the Groundwater Supply Assessment, and estimated waste water composition are presented in Appendix B.

Preliminary design details provided by Black & Veatch include the treatment of raw groundwater and production of demineralised water for use in the Hydrogen Plant electrolyser (Appendix A – Figure 4). The process water will be treated with an efficiency of approximately 70% and produce a process wastewater equating to approximately 30% volume of raw water used (assuming groundwater only, no supplementary rainwater). The hydro chemical signature of the resulting wastewater is therefore likely to be similar to hydrochemical signature of baseline groundwater samples, but with elevated concentrations. Black and Veech have provided expected wastewater composition based on baseline groundwater samples (Appendix B), however it is important to note the potential for variable groundwater chemistry, particularly during and after periods of groundwater extraction over prolonged periods of time.

As a result the expected composition of the wastewater, or effluent includes several substances which will be listed in the Schedule of EPA (Industrial Emissions)(Licensing) Regulations 2013, S.I. No. 137 of 2013, or listed in the Annex to EU Directive 2006/11/EC (as amended), including general groundwater properties such as nitrogen or phosphorous based compounds i.e. nutrients with the potential to impact on oxygen availability among others. With the potential for variable groundwater quality, and the potential for sources of contaminants within the zone of contribution associated with the Hydrogen Plant groundwater extraction point, other contaminants have the potential to be introduced to the system.

The system will be dosed with some cleaning and anti-scaling products. Black and Veech provide the following information:

#### Anti-scalants

- Example data sheets for proprietary products BV has used on previous projects for maintenance of treatment systems membranes (Reverse Osmosis).
- These would be expected to be dosed into the system at less than 10mg/L,

Ref. 603676 PDACA 05

Mercury Renewables

PDACA – Firlough Green Hydrogen, Co. Sligo

typically 5 mg/L

- Used to prevent mineral scale formation on the RO membrane surface
- The data sheets show that there are no ecotoxicity effects at the maximum dosing level
- Storage of antiscalants would be contained to prevent spills

#### Sodium Bisulphite

- Example data sheets for proprietary products BV has used on previous projects for maintenance of treatment systems
- This would be expected to be dosed into the system at less than 5mg/L, typically 2-3mg/L
- Datasheet shows it is a non-hazardous solution commonly used as a waste water dichlorination agent. High concentrations will contribute to elevated chemical oxygen demand in aquatic environments, however, maximum dosing is far below exposure limits.
- Storage of sodium bisulphite would be contained to prevent spills

It is understood that Sodium Bisulphite will be used only if mains water is used as a raw water source. This is unlikely to happen except for exceptional circumstances where the preferred raw water sources, groundwater and rain water, are not available.

These products are not likely to cause significant adverse impact at the low concentrations they will be dosed into the system, which will further reduce following on site primary and secondary treatment. However, in their raw form these products have the potential to cause a more significant impact, and in line with typical safety datasheets associated with these products, the use of these products will be managed and monitored, and accidental release avoided through appropriate measures, including diverting away from drainage systems. The products that will be used for the Hydrogen Plant system will be not include any substances which are persistent and/or bioaccumulate.

### 3.5 Process Wastewater Discharge Flows

Preliminary water balance assessment data provided by Black & Veatch is presented in the following table.

**Table 4 - Predicted Wastewater Rate per Month**

Predicted Wastewater Rate per Month						
Month	Avg Waste Water (m3)	m3/day	m3/hour	l/hour	l/sec	
Jan	1,726.89	57.563	2.398	2398.458	0.666	
Feb	2,029.27	67.642	2.818	2818.431	0.783	
Mar	1,550.09	51.670	2.153	2152.903	0.598	
Apr	1,269.43	42.314	1.763	1763.097	0.490	
May	1,281.02	42.701	1.779	1779.194	0.494	
Jun	1,222.71	40.757	1.698	1698.208	0.472	
Jul	880.17	29.339	1.222	1222.458	0.340	

Ref. 603676 PDACA 05

Mercury Renewables

PDACA – Firlough Green Hydrogen, Co. Sligo



Predicted Wastewater Rate per Month					
Month	Avg Waste Water (m3)	m3/day	m3/hour	l/hour	l/sec
<b>Aug</b>	1,165.98	38.866	1.619	1619.417	0.450
<b>Sep</b>	1,287.65	42.922	1.788	1788.403	0.497
<b>Oct</b>	1,707.79	56.926	2.372	2371.931	0.659
<b>Nov</b>	1,556.83	51.894	2.162	2162.264	0.601
<b>Dec</b>	1,855.96	61.865	2.578	2577.722	0.716
<b>Min</b>	880.17	29.34	1.22	1,222.46	0.34
<b>Max</b>	2,029.27	67.64	2.82	2,818.43	0.78
<b>Mean</b>	1,461.15	48.70	2.03	2,029.37	0.56
<b>Total</b>	17,533.79				

Peak average wastewater equates to 2.82 m3/hour or c. 0.78 l/sec (February).

The above wastewater values are included in Appendix C – Preliminary Assimilative Capacity Assessment and are used as the discharge flow rate in preliminary assimilative capacity assessments.

It must be noted that the above predicted discharge rates, or wastewater volumes arising from the Hydrogen Plant are derived assuming; the Hydrogen Plant is operating on 100% wind take from the Wind Farm in line with predicted potential wind energy per month (50<sup>th</sup> percentile (20yr) average).

Figure 4 – Conceptual Process & Treatment Train Flow Diagram

### 3.6 Preliminary Assimilative Capacity Assessment

A preliminary assimilative capacity assessment has been completed (Appendix C).

Biological Oxygen Demand (BOD) has been assessed under 3 no. scenarios.

- **Scenario A** – Using;
  - Inferred Constant River HHYDRO Tool Q95%ile and
  - Monthly Average Wastewater Discharge Rate, combined with
  - Wastewater Storage and NO Restricted Discharge Rate

Results:

Assimilative Capacity = Pass

Mass Balance = Pass

Comment = At inferred Q95 of c. 4.6 l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will not have a significant adverse impact on surface water quality.

- **Scenario B** – Using;
  - Inferred Variable River Q95%ile or and
  - Monthly Average Wastewater Discharge Rate, combined with
  - Wastewater Storage and NO Restricted Discharge Rate

Results:

Assimilative Capacity = Fail in July (Indicative Dry Weather Flow).

Mass Balance = Pass

Comment = At inferred variable Q95 or indicative seasonal discharge rate l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will have a significant adverse impact on surface water quality during some months of the year.

- **Scenario C (Base Case)** – Using;
  - Inferred Variable River Q95%ile (HHYDRO Tool Derived) and
  - Monthly Average Wastewater Discharge Rate, combined with
  - Wastewater Storage and WITH Restricted Discharge Rate

Results:

Assimilative Capacity = Pass

Mass Balance = Pass

Comment = At inferred variable Q95 or indicative seasonal discharge rate l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will not have a significant adverse impact on surface water quality during some months of the year.

### 3.7 Results Interpretation & Commentary

The following points are noted;

- i. The proposed Base Case, allowing excess wastewater storage enables regulating of discharge rates. Reducing peak flow by 50% (Appendix C, Scenario C) will result in pass for the July in contrast to Scenario B discussed previously. This Base Case indicates that the proposed mitigation will be sufficient in managing discharge loading of assessed contaminants and achieving Environmental Quality Standards for river water quality and maintaining WFD status.
- ii. Assuming very low flow conditions during dryer months, discharge at peak rates (no utilization of designed wastewater storage) and discharging in line with indicative discharge licence limits (BOD 10mg/l used in assessment, with an EQS water quality reference of 5mg/l), the discharge has the potential to significantly impact on surface water quality i.e. loading with contaminants with a result of elevating downstream concentrations above environmental quality standards (Salmonid Regs reference limits). Results (Appendix C) indicate that the assimilative capacity test failed, but the mass balance passed, under the Scenario B in July. This highlights the requirement for dynamic mitigation and the monitoring and regulation of both discharge and river properties in the proposed Base Case above.
- iii. This indicates the requirement to manage and reduce discharge during excessively dry conditions. Monitoring will be required to specify and actively manage the treatment and discharge system.
- iv. Wastewater volumes generated at the site will be variable month to month depending on and in line with potential wind energy production, the utilisation of the energy and the utilisation capacity at the Hydrogen Plant Site. As a result, the Hydrogen Plant will have largest volumes of wastewater generated in February, with lowest volumes in summer months. This is also generally in line with rain fall trends through out year.
- v. The wastewater volumes provided for this assessment are based on fully installed capacity of the Hydrogen Plant operating on 100% wind take of the Firlough Wind Farm (assuming 50<sup>th</sup> percentile (20yr) average generation forecast). These rates will not be achieved until the installed capacity of the Hydrogen Plant reaches 80MWs. Loading and rates of discharge from the Hydrogen Plant Site are expected to be linear from no installed Hydrogen Plant capacity up to 80MW of installed Hydrogen Plant capacity, on which this report is based.

The following points are noted;

- i. Wastewater volumes generated at the site will be variable month to month depending on and in line with potential wind energy production, the utilisation

- ii. of the energy and the utilisation capacity at the Hydrogen Plant . As a result, the Hydrogen Plant will have largest volumes of wastewater generated in February, with lowest volumes in summer months. This is also generally in line with rain fall trends through out year.

The wastewater volumes provided for this assessment are peak rates based on utilising the output of the Wind Farm (Modelled using P50 data) .

## 4 CONCLUSIONS

---

With reference to assumptions, results and interpretation outlined in the previous sections, this preliminary Discharge and Assimilative Capacity report assesses the potential for adverse impact on the receiving surface water network, addresses the minimum requirements for assessing discharge to surface water in line with licence application procedures, and with a view to quantifying and qualifying potential impact, identifying data gaps and scoping of further detailed assessment. In line with the assessment approach outlined in **Section 2.10**, the following items are addressed;

***Plans and other particulars to describe the premises, drainage system and any works, apparatus or plant from which the effluent is to be discharged;***

Preliminary project layout and design presented in Figure 2 - Proposed Development Layout. Detailed design to be completed pending planning application consent and will include full details on the proposed facility and ancillary infrastructure.

Conceptual water management and treatments train/s discussed Section 3 and presented in Figure 4 – Conceptual Process & Treatment Train Flow Diagram.

***Identify the waters to which the discharge is to be made and the point of discharge;***

Receiving surface waters are identified, discussed Section 3, and presented in;

Figure 1 - Site Location

Figure 2 - Proposed Development Layout

Figure 3 - SW Monitoring Locations

***Particulars of the nature, chemical composition, anticipated temperature, volume and rate of discharge;***

As discussed under this report, envisaged contaminant loading in effluent is likely to be relatively low. At a minimum, wastewater treatment and management on site will achieve quality in line with typical / prescribed discharge licence limits. Refer to Appendix B Database. Additional detail will be required with the discharge licence application.

***Details of the proposed method of any treatment of the effluent and the period or periods during which the effluent is to be discharged;***

Source water will be treated as part of the hydrogen production process, the wastewater arising from this process will be treated by means of constructed wetland and regulated discharge rates. Any particular contaminant which is observed to be excessively high in incoming source water will be targeted with specific wastewater treatment.

A detailed wastewater management plan is to be established. Additional detail will be required with the discharge licence application.

***A general description of the process or activity giving rise to the discharge;***

Raw water treatment for hydrogen production.

***The results of any investigation made into the impact of the discharge on the receiving waters;***

Results of preliminary Discharge Assimilative Capacity in the subject river to receive trade effluent discharge from the proposed facility is presented in Appendix C – Preliminary Assimilative Capacity Assessment.

- Scenario A - Using Inferred Constant River HHYDRO Tool Q95%ile and Monthly Average Discharge Rate

Results:

Assimilative Capacity = Pass

Mass Balance = Pass

Comment = At inferred Q95 of c. 4.6 l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will not have a significant adverse impact on surface water quality.

- Scenario B - Using Inferred Variable River Q95%ile (HHYDRO Tool Derived) and Monthly Average Discharge Rate, combined with Wastewater Storage and NO Restricted Discharge Rate

Results:

Assimilative Capacity = Fail in July (Indicative Dry Flow conditions).

Mass Balance = Pass

Comment = At inferred variable Q95 or indicative seasonal discharge rate l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will have a significant adverse impact on surface water quality during some months of the year.

- Scenario C (Base Case) - Using Inferred Variable River Q95%ile (HHYDRO Tool Derived) and Monthly Average Discharge Rate, combined with Wastewater Storage and WITH Restricted Discharge Rate

Results:

Assimilative Capacity = Pass

Mass Balance = Pass

Comment = At inferred variable Q95 or indicative seasonal discharge rate l/sec each month, based on available baseline data, and envisaged effluent loading, discharge will not have a significant adverse impact on surface water quality during some months of the year.

***Particulars of the quality of the receiving waters. This is to include as a minimum, a description of the chemical and bacteriological condition of the receiving water at the point of discharge.***

Appendix B. . Additional detail will be required with the discharge licence application

***Particulars of the volume and flow rate of receiving waters, indicating 95%ile flow and Dry Weather Flow (DWF);***

This is inferred using data for a neighbouring catchment. Additional detail will be required with the discharge licence application

***Details of the effects of the discharge on the receiving waters, which is to address the chemical and ecological qualities of the receiving water.***

Provided additional detail will be obtained and an effective wastewater management plan is implemented, in line with the recommendations provided here with (Section 5), the discharge of trade effluent at the site is unlikely to have a significant adverse impact on the receiving surface water quality and associated ecological attributes.

## 5 DISCUSSION & RECOMMENDATIONS

---

The following recommendations are made following preliminary assessment observations, and in line with requirements of relevant guidance for discharge to surface waters.

### 5.1 Process Source Water, Wastewater Management & Discharge

The following is recommended with a view to managing wastewater quality and volumes on site, and minimizing potential for discharge to have adverse impacts on receiving surface water quality;

- Groundwater quality will be monitored on a routine / continuous basis with a view to establishing site specific baseline water quality ranges managing source water and process water chemistry.
- Surface water quality will be monitored on a routine / continuous basis with a view to establishing site specific Q95 and baseline water quality ranges, and managing source water and process water chemistry.
- Groundwater levels will be monitored continuously.
- Surface water levels and discharge rate in the receiving river will be monitored continuously.
- Water sources (groundwater and harvested rainwater) will be utilized and combined at the beginning of the process to minimize contaminant loading in the process source water generally with a view to minimizing loading on downstream wastewater treatment systems.
- Groundwater abstraction volumes will be monitored and recorded continuously. It is likely that the development will exceed abstraction volumes of 25m<sup>3</sup>/day. Therefore, the facility will be required to register with the EPA and follow any associated guidance or legislated responsibility.
- ‘Water Environment (Abstractions and Associated Impoundments) Act 2022’, the bill sets out a process for the registration, assessment and licensing of both surface water and groundwater abstractions.
  - All abstractions, including group water schemes, that reach a minimum daily threshold of abstraction (25m<sup>3</sup> per day) will be required to register its abstraction in a similar fashion. Those that abstract 2,000m<sup>3</sup> or more will automatically require an abstraction licence.
  - EPA will assess abstractions and if deemed necessary due to potential environmental risk certain development will require EIA. EIAs for these abstractions will reviewed at least once every six years.
  - For groundwater, recharge times and impacts on connected surface waters are among the elements assessed.



- There is onus on stakeholders to ensure sustainable use of water, and in light of climate change and potential for extreme meteorological conditions, to work towards water sustainability gains.
- In line storage throughout the process will facilitate buffering flow through and discharge rates. This includes wastewater storage with a view to buffering inflow and regulating discharge from wastewater treatment works on site.
- Process water treatment will include at minimum the proposed design features i.e. Filtration, Reverse Osmosis, and Deionization. The process water treatment facility will be designed to include additional treatment features where required, for example; with the potential for increasing concentrations of contaminants being extracted from the Zone of Contribution (ZOC) over time, the engineered process source water treatment facility will be equipped when and if required to remove elevated concentrations of any particular contaminant which may overload or adversely impact on performance of downstream wastewater treatment facilities.
- All engineered water and wastewater treatment systems will be designed and specified by competent, qualified and experienced engineers.
- Two wastewater streams identified i.e. process wastewater and foul sewage arising from welfare facilities (toilets, canteen etc.) will be dealt with separately initially.
- Wastewater will be treated and managed through passive but managed nature-based solutions, including constructed wetlands (Note; engineered treatment solutions for waste water will be included upstream in the process source water treatment facilities.
- All nature based water and wastewater treatment systems (constructed wetlands) will be designed and specified by competent, qualified and experienced environmental engineers. It is recommended that this item is executed at an early stage of the detailed design. Constructed wetlands will be designed with particular characteristics and ecological attributes based on the expected contaminant loading, achievable retention time, and performance / discharge quality objectives. The wetland systems will likely take some time to become established and therefore will be required at an early stage of the construction stage of the development. The detailed assessment and design of constructed wetlands will follow the Department of Agriculture, Fisheries and Food guidance document (2011), Minimum Specification for Integrated Constructed Wetlands and Ancillary Works.
- Without advanced assessment of the site hydrogeological properties, including soil infiltration rates and potential for natural attenuation of contaminants, it is recommended that constructed wetlands are lined and do not permit infiltration or recharge to groundwater bodies..
- Foul sewage will undergo primary treatment by septic tank. The septic tank will be emptied by tanker in line with standard practices. The outfall of the septic tank will be transferred to the foul sewage constructed wetland (FCW) for secondary treatment. The FCW will be positioned in the northeast corner of the site and will be approximately 80m<sup>2</sup> to facilitate the optimal retention time of c. 12 days to adequately treat the welfare effluent loading. The outfall of the FCW will be combined with process wastewater in storage before being transferred to the second constructed wetland configuration.

- The outfall of the foul constructed wetland (FCW) will be monitored and sampled in line with sampling frequency and reporting requirements set out in the discharge licence conditions, discussed in later points.
- The combined wastewater will be pumped to a secondary series of process constructed wetlands (PCW). The remaining area on the site will be utilized to maximize area of PCW and associated retention time. This includes a linear feature within the 5m easement along the southern boundary. Based on initial high level calculations, with the approximate space left available on site, and with regulation of loading and discharge rates, the PCW will achieve a minimum of 6 days retention time. This is lower than the required retention time for loading in line with foul sewage arising from welfare facilities, however the loading from process wastewater will be significantly less than that of welfare wastewater of sewage under normal circumstances\*.

\*Potential for variable source water / groundwater quality

- Wastewater storage will be adequately sized (e.g., c. 1500m<sup>3</sup>) to achieve ability to significantly reduce (e.g. 50%) discharge rates to surface water, or in emergency situations to completely halt discharging for a minimum duration of one month. Emergency situations in the context of this report includes observing prolonged drought conditions and prolonged low dry weather discharge rates in the receiving river, for example; under Scenario B described in this report, discharging under such conditions could significantly adversely impact on water quality in the receiving river. Therefore, this is an important piece to consider in the management of wastewater and effluent discharge.
- The production of hydrogen on an industrial scale is an activity listed in First Schedule of the Environmental Protection Agency Act, 1992 (as amended) and therefore an Industrial Emissions Licence may be required and the Developer will apply to the EPA for same. To the extent that the EPA do not consider the production of hydrogen at the facility to be on an industrial scale or otherwise not require an Industrial Emissions licence then the Developer will apply for a discharge license from the relevant local authority (Sligo Co. Co. / Mayo Co. Co.). The facility will be operated in accordance with all industrial emissions and discharge licences applicable to the facility and the discharge of waste water to the adjacent water course.

## 5.2 Detailed Discharge & Assimilative Capacity (DACA)

Pending consent for the Proposed Development, during the detailed design and post consent stage, and prior to construction / operational phase this preliminary Discharge & Assimilative Capacity Assessment will be refined and updated through further assessment (based on the framework established under this report, including EPA guidance for applying for IPC licence if required) of surface water discharge and additional baseline chemistry analysis will be carried out and wastewater management plan will be refined. Continuous monitoring through the life of the project will be used to review and update methodologies wherever appropriate on an ongoing basis, that is; the detailed water and wastewater management plan which will be developed prior to the construction phase of the development will be live document and procedures will be amended where relevant based on ongoing continuous and/or routine monitoring.

This will follow the requirements set out in EPA 2018 Licence Application Form Guidance including following relevant Best Available Techniques (BAT).

## 5.3 Detailed Monitoring Plan

As discussed and mentioned throughout this report, monitoring will be required at numerous locations to facilitate and ensure adequate management of a dynamic process in terms of expected source water, wastewater, and receiving water qualities. Detailed monitoring plans will be developed for the following;

- Input and Sources
  - Groundwater levels will be monitored continuously.
  - Ambient groundwater chemistry will be monitored in boreholes. As per likely licence conditions, a minimum of quarterly monitoring of groundwater chemistry will be required.
  - Rainfall at the site will be monitored continuously.
  - Harvested Rainwater & Storm Water volumes.
  - The use of storm water as a raw material requires pre-treatment via oil water separation during storage to prevent contamination of process by hydrocarbons. This will require regular monitoring and maintenance in line with standard practices.
  - Continuous monitoring of water sources being input to the facility and process water treatment works. Establishing site specific water quality ranges will be necessary to ensure consistent and appropriate loading in wastewater.
- Process Water Treatment & Output
  - It is assumed that the engineered water and wastewater treatment facilities will require a degree of continuous monitoring as standard. However at minimum the works will monitor flows and concentrations of key parameters in wastewater streams. This will be carried out on an ongoing basis to ensure that the water treatment systems are functioning adequately, and to monitor

the contaminant loading in wastewater transferred to nature based treatment systems downstream i.e. constructed wetlands.

- Welfare and Foul Sewage
  - Septic tanks will require monitoring and maintenance in line with standard practices.
  - The outfall of the Foul Constructed Wetland (FCW) will be monitored continuously for key chemical parameters and physically sampled in line with likely licence conditions.
  - FCW outfall volumes will be monitored on a continuous basis with a view to monitoring chemistry of combined FCW outfall and Process Wastewater.
- Wastewater Treatment
  - Volumes within wastewater buffer storage will be monitored continuously.
  - Quality data obtained from process water treatment and FCW outfall monitoring will be utilized to infer water quality within wastewater buffer storage, if chemistry in storage is monitored directly. This will be done on a continuous basis for key parameters.
  - The outfall / pumped volume from wastewater storage to the Process Constructed Wetland (PCW) will be monitored continuously.
  - Health and performance of all constructed wetlands will be monitored on an ongoing basis.
- Discharge & River
  - Routine and continuous monitoring of surface water quality in line with licence conditions and advised Environmental Quality Standard (EQS) chemical parameters including but not limited to; temperature, pH, turbidity, electrical conductivity, dissolved oxygen, nitrogen, phosphorous, and other key EQS parameters. This will be done with continuous monitoring equipment for a select key parameters and those which can practically be monitored in situ in real time. Other parameters which require physical sampling e.g. Biological Oxygen Demand (BOD) will be monitored on a routine basis, with high frequency e.g. weekly to inform the development of the detailed water management plan, that is; adequate data to establish representative baseline concentration trends of key parameters and to adjust assimilative capacity calculations accordingly.
  - Monitoring described above will be conducted at three monitoring locations on the river; upstream (FHP-SW-US), the discharging effluent at the discharge point (DP) or at a representative (of end of pipe) sampling location on the discharge line, and downstream (FHP-SW-DS) of development. Continuous real time monitoring data obtained at these locations will be used to manage and calibrate the wastewater and discharge regime at the site.
  - Discharge rates in the river will be monitored on a continuous basis. Data obtained will be used to establish a hydrograph and associated discharge (Q) percentiles (similar to EPA HydroTool) for the river at the point of monitoring

i.e. DP. Dry weather flow will also be qualified. Continuous real time monitoring data will be used to manage and calibrate the wastewater and discharge regime at the site e.g. restricting discharge during dry weather discharge rates will inadequate assimilative capacity.

- Overall Environmental Impact
  - All data obtained will be compiled, reviewed, assessed and used to inform ongoing review and assessment of overall impacts to the receiving environment in terms of sustainable use and interaction e.g. ongoing monitoring of effects on groundwater quality and levels, ongoing monitoring of river water discharge rates and quality.
- Reference Values
  - With reference to EPA 2018 Licence Application Form Guidance, full suite of relevant parameters will be identified, screened, and emission limit levels proposed as part of licence application procedures.

#### **5.4 Detailed Design & Specification**

The detailed design of all water and wastewater facilities and functions, including monitoring stations will be carried out by qualified and experienced engineers specializing in respective fields and following relevant standards and guidance associated with each. These elements include;

- Groundwater abstraction and ancillary works.
- Rain and storm water harvesting and ancillary works
- Source water storage and ancillary works.
- Process source water treatment and ancillary works.
- Welfare foul sewage systems including septic tanks and ancillary works.
- Wastewater buffer storage and ancillary works.
- Constructed wetland systems and ancillary works.
- Discharge points and ancillary works.
- Environmental and process systems monitoring, long-term and real time data and systems management, environmental assessment and interpretation.

## 6 REFERENCES

---

EPA (2018) Licence Application Form Guidance

Sligo County Council (No Date) *Guidance on Applying for a Discharge Licence to Surface Waters*

Minerex Environmental Ltd. (28/10/2022) *Firlough Hydrogen Plant – Groundwater Supply Assessment (Doc Ref. 3131-043 (Rev1))*

Environmental Protection Agency (EPA) *Water abstraction - An abstraction is the removal or diversion of water from a river, lake, stream, spring, groundwater well, borehole or estuary, for any purpose.* [Online] Available at: <https://www.epa.ie/our-services/licensing/freshwater--marine/water-abstraction/> (Accessed May 2023)

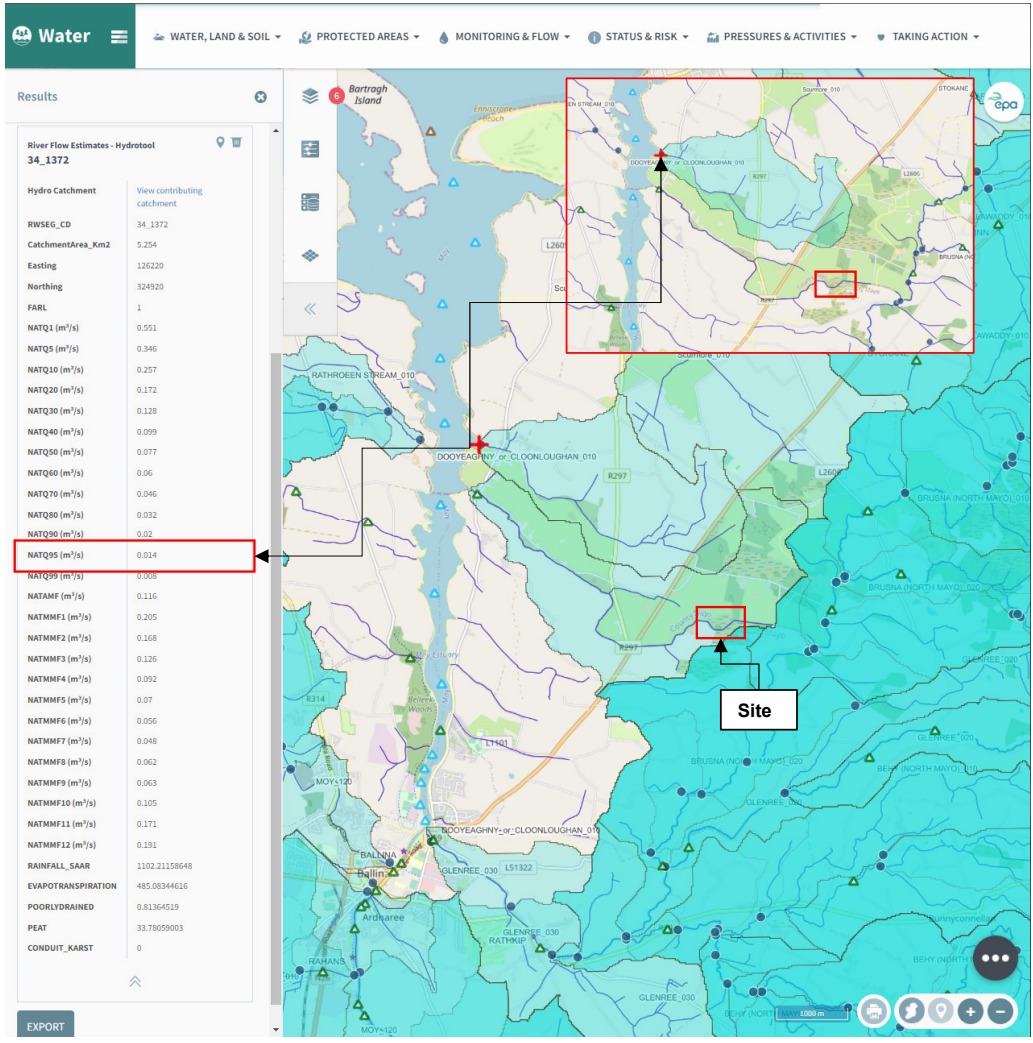
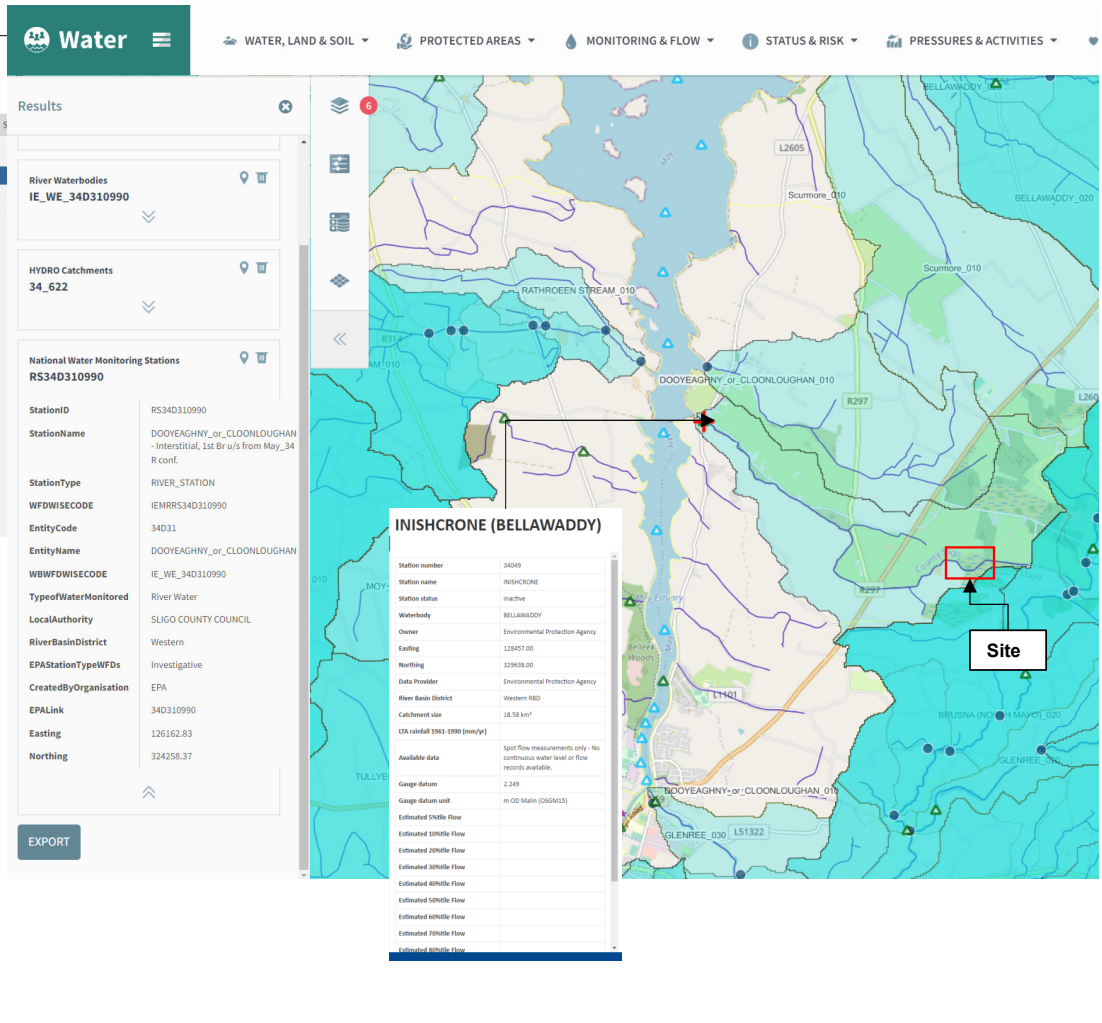
Constructed Wetland Association (CWA) (2017) *Guidelines – Constructed Wetlands to Treat Domestic Septic Tank Effluent*

Cawley A.M., Healy M. (2000) *Evaluation of the waste treatment performance of constructed wetlands with special reference to Williamstown Co. Galway Wetland System*

DEPARTMENT OF AGRICULTURE, FISHERIES AND FOOD (2011) Minimum Specification for Integrated Constructed Wetlands, and Ancillary Works.



# APPENDIX A



Site Name:  
**Firlough Green Hydrogen  
pDACA App. A**

Figure Name:  
**Figure 1  
Site Location & SW Discharge Data**

<b>Project No.</b>	603676
<b>Client:</b>	Mercury Renewables
<b>Date:</b>	03/05/23
<b>Revision:</b>	02

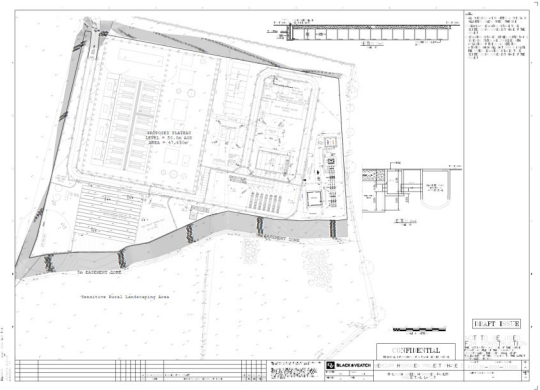
**Drawn By:** Sven Klinckenbergh  
Principal Environmental Consultant

**Reviewed By:** SK



Conceptual Graphics & Design for consideration at detailed design phase and engineered specification of required infrastructure. Not to scale.





UST - Rain

Discharge line and outfall

Discharge Point

Check dams / similar

Welfare Foul Sewage Primary & Secondary Treatment

Welfare CW Will be 80m2

Process CW Approx. 650 m2 available, spec CW to minimum 400m2.

Process Swale CW Approx. 13m length x 4m width and 0.5m depth.

DOOYEAGHNY\_or\_CLOONLOUGHAN\_010

Desc.	Unit	Welfare CW	Process CW	Process SWALE	SUBTOTAL
L	m	10			131
W	m	8			4
Area	m2	80	400	524	
Note		web tool			
Feature Depth	m	0.5	0.5	0.5	
Feature Volume	m3	40	200	262	
Porosity	%	40%	40%	40%	
Water Volume	m3	16	80	104.8	
Flow, m3/day	m3/day	3.5			
Flow, m3/hr	m3/hr	0.1458	2.8	2.8	
Flow, l/sec	l/sec	0.0405	0.8	0.8	
Hydraulic retention time	Hours	285.7	114.28	90	204.28
Note		web tool			
Hydraulic retention time	Days	11.90	4.76	3.75	8.51

Note: Drawing / Map is considered a conceptual model with reasonable accuracy for the purposes of environmental assessment. This drawing should not be relied upon for detailed design purposes. Projection: I.T.M. Data Sources: EPA, GSI, Bing Aerial, OpenStreetMap.

Site Name:  
**Firlough Green Hydrogen  
 pDACA App. A**

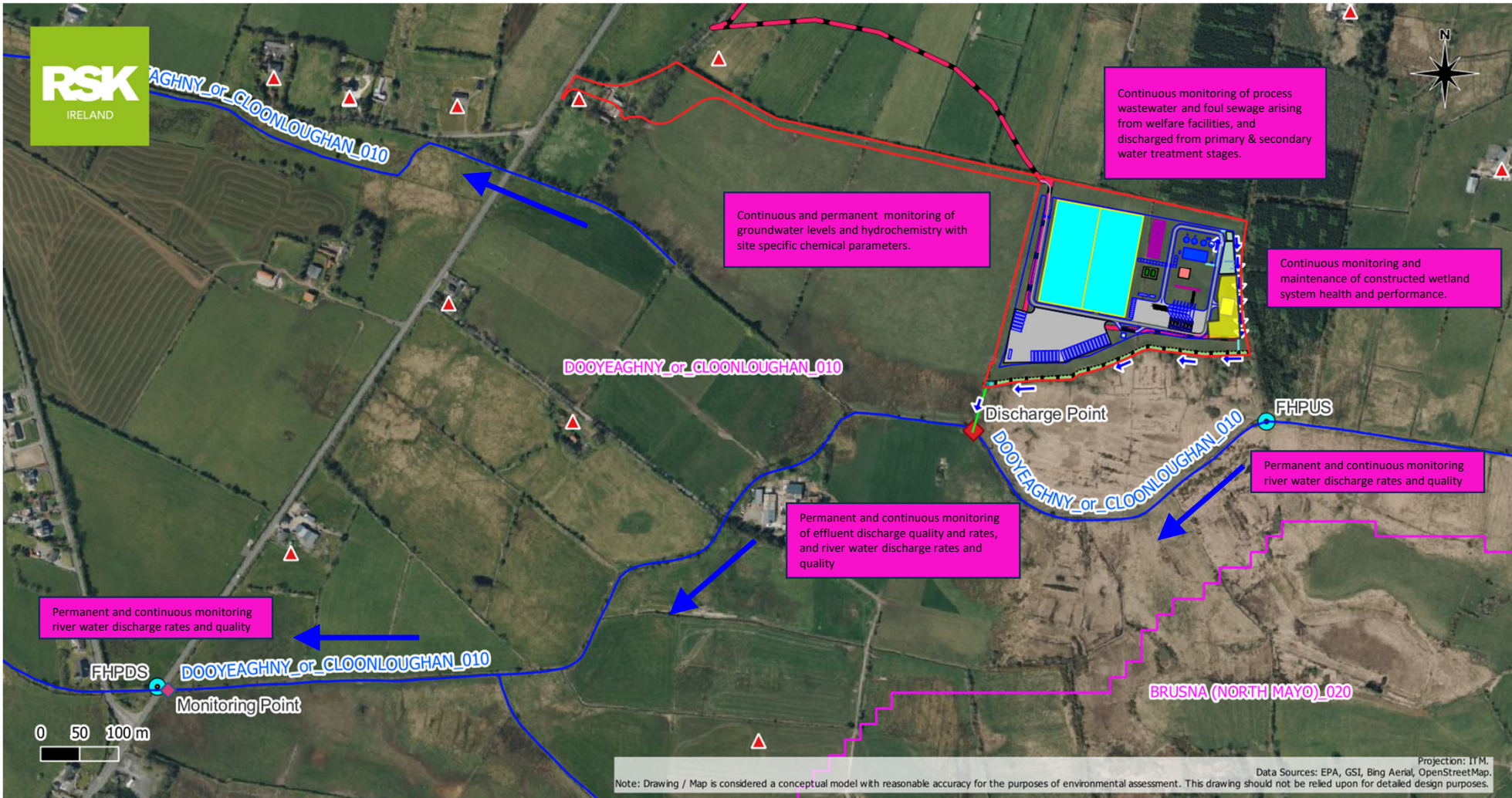
Figure Name:  
**Figure 2  
 Proposed Development**

**Project No.** 603676  
**Client:** Mercury Renewables  
**Date:** 27/06/23  
**Revision:** 03

**Drawn By:** Sven Klinkenbergh  
 Principal Environmental Consultant  
**Reviewed By:** SK



Conceptual Graphics & Design for consideration at detailed design phase and engineered specification of required infrastructure. Not to scale.



Note: Drawing / Map is considered a conceptual model with reasonable accuracy for the purposes of environmental assessment. This drawing should not be relied upon for detailed design purposes.

Projection: ITM.  
Data Sources: EPA, GSI, Bing Aerial, OpenStreetMap.

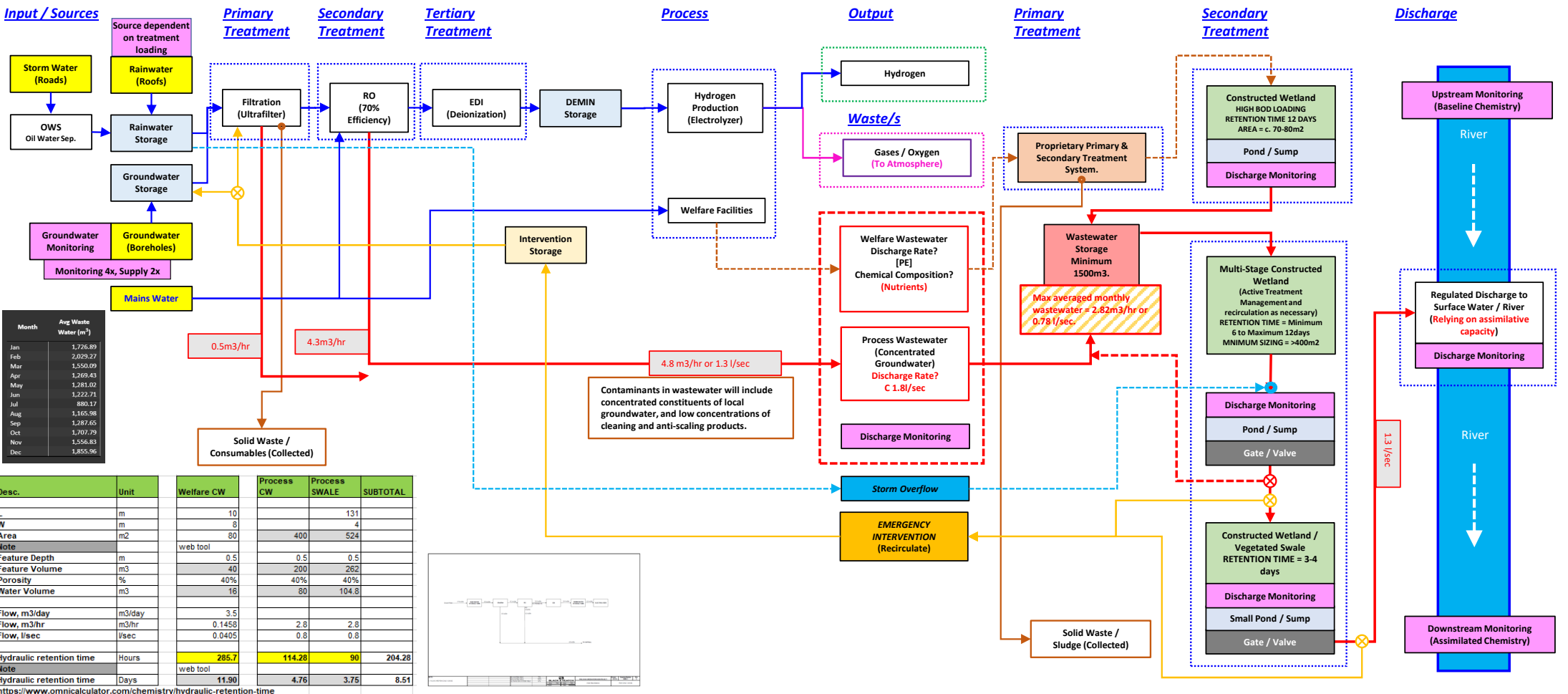
Site Name: <b>Firlough Green Hydrogen          pDACA App. A</b>	<b>Project No.</b> 603676	<b>Drawn By:</b> Sven Klinkenbergh Principal Environmental Consultant
	<b>Client:</b> Mercury Renewables	
Figure Name: <b>Figure 3          Site Location &amp; SW Baseline Locations</b>	<b>Date:</b> 27/06/23	<b>Reviewed By:</b> SK
	<b>Revision:</b> 03	



Conceptual Graphics & Design for consideration at detailed design phase and engineered specification of required infrastructure. Not to scale.

# Conceptual Treatment Train Flow Diagram

Indicative Flow / Discharge rates.



Site Name: **Firlough Green Hydrogen pDACA App. A**

Project No. 603676  
 Client: Mercury Renewables

Drawn By: Sven Klinkenbergh  
 Principal Environmental Consultant

Figure Name: **Figure 4 Hydrogen Site – Conceptual Process & Treatment Train Flow Diagram**

Date: 27/06/23  
 Revision: 03

Reviewed By: SK



Conceptual Graphics & Design for consideration at detailed design phase and engineered specification of required infrastructure. Not to scale.



# APPENDIX B







# APPENDIX C

603676 - Firlough Hydrogen (SK 14/02/2023)			Preliminary Assimilative Capacity Assessment - BOD																	
			Scenario A - Using Inferred Constant River HHYDRO Tool Q95%ile and Monthly Average Discharge Rate																	
Cat.	Desc.	Units	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL	MIN	MAX	AVERAGE	Met	Comment
1	AssestIME	Period (Month/Annual)																		
2	AssestRAIN	Rainfall LTA (mm/month) (KNOCK AIR)	135.400	102.900	118.100	81.600	92.000	91.500	95.700	107.900	111.300	141.300	134.200	141.400	1,353.300	81.600	1,353.300	224.391		Met Eireann
3	AssestRAIN	Rainfall LTA (cm/month) (Secondary Axis) (KNOCK AIR)	13.540	10.290	11.810	8.160	9.200	9.150	9.570	10.790	11.130	14.130	13.420	14.140	135.330	8.160	135.330	22.439		
4	AssestRAIN	Rainfall LTA (mm/month) (KNOCK AIR)	0.135	0.103	0.118	0.082	0.092	0.092	0.096	0.108	0.111	0.141	0.134	0.141	1.353	0.082	1.353	0.224		Met Eireann / MEL
5	AssestRAIN	Rainfall LTA (mm/month) (3131-011)	134.000	113.000	98.000	77.000	93.000	94.000	110.000	117.000	111.000	131.000	142.000	151.000	1,371.000	77.000	1,371.000	226.818		
6	AssestRAIN	Rainfall LTA (cm/month) (3131-011)	13.400	11.300	9.800	7.700	9.300	9.400	11.000	11.700	11.100	13.100	14.200	15.100	137.100	7.700	137.100	22.682		
7	AssestRAIN	Rainfall LTA (mm/month) (3131-011)	0.134	0.113	0.098	0.077	0.093	0.094	0.110	0.117	0.111	0.131	0.142	0.151	1.371	0.077	1.371	0.227		
8	AssestRAIN	Site Area - Roofed (3131-011)	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	14,800,000	n/a	n/a	n/a		
9	AssestRAIN	Harvested RAIN Volume	2,003,920	1,522,920	1,747,880	1,207,880	1,361,600	1,354,200	1,416,360	1,596,920	1,647,240	2,091,240	1,996,160	2,092,720	20,028,840	1,207,880	20,028,840	3,320,985		
10	AssestRAIN	Site Area - Not Roofed (3131-011)	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	32,850,000	n/a	n/a	n/a		
11	AssestRAIN	Harvested Storm Volume	4,447,890	3,380,265	3,879,585	2,680,560	3,022,200	3,005,775	3,143,745	3,544,515	3,656,205	4,641,705	4,408,470	4,644,990	44,455,905	2,680,560	44,455,905	7,371,241		
12	AssestRAIN	Total Rain & Storm Volume	6,451,810	4,903,185	5,627,465	3,888,240	4,383,800	4,359,975	4,560,105	5,141,435	5,303,445	6,732,945	6,394,630	6,737,710	64,484,745	3,888,240	64,484,745	10,692,227		
13	AssestRAIN	Rain Storage	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	6,000,000	n/a	n/a	n/a		
14	AssestWELFARE WW	Projected Aeration Wastewater (m3) (Based approximately on 7 site staff and c. 26 visitors / drivers per day)	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	n/a	n/a	n/a		
15	AssestWELFARE WW	Projected Aeration Wastewater	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	n/a	n/a	n/a		
16	AssestWELFARE WW	Projected Aeration Wastewater	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	0.0000405	n/a	n/a	n/a		
17	AssestWELFARE WW	Projected Aeration Wastewater	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	0.041	n/a	n/a	n/a		
18	AssestWELFARE WW	Constructed Wetland (Welfare) - Retention Time	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	11.934	n/a	n/a	n/a		
19	AssestWELFARE WW	Constructed Wetland (Welfare) - Outfall	Method	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	to WW Storage	n/a	n/a	n/a		
20	AssestPROCESS WW	Projected Aeration Wastewater (m3) (B&V)	1726.890	2029.270	1550.090	1269.430	1281.020	1222.710	890.170	1165.980	1287.650	1707.790	1556.830	1855.960						Provided by B&V
21	AssestPROCESS WW	Projected Aeration Wastewater (m3/day)	57.563	67.642	51.670	42.314	42.701	40.757	29.339	38.866	42.922	56.926	51.894	61.865						
22	AssestCOMBINED WW	Projected Combined Aeration Wastewater (m3) (Welfare & Process)	61.063	71.142	55.170	45.814	46.201	44.257	32.839	42.366	46.422	60.426	55.394	65.365						
23	AssestCOMBINED WW	Projected Combined Average Wastewater (m3/hour)	2.544	2.964	2.299	1.909	1.925	1.844	1.368	1.765	1.934	2.518	2.308	2.724						
24	AssestCOMBINED WW	Projected Combined Average Wastewater (m3/sec)	0.0007067	0.0008234	0.0006385	0.0005303	0.0005347	0.0005122	0.0003801	0.0004903	0.0005373	0.0006994	0.0006411	0.0007565						
25	AssestCOMBINED WW	Projected Combined Average Wastewater (l/sec) (Secondary Axis)	0.707	0.823	0.639	0.530	0.535	0.512	0.380	0.490	0.537	0.699	0.641	0.757						
26	AssestCOMBINED WW	Wastewater Storage	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	n/a	n/a	n/a		
27	AssestDISCHARGE	RESTRICT DISCHARGE RATE Coefficient	%	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	n/a	n/a	n/a		
28	AssestDISCHARGE	Discharge Rate	m3/hour	2.544	2.964	2.299	1.909	1.925	1.844	1.368	1.765	1.934	2.518	2.308	2.724					
29	AssestDISCHARGE	Discharge Rate	m3/sec	0.0007067	0.0008234	0.0006385	0.0005303	0.0005347	0.0005122	0.0003801	0.0004903	0.0005373	0.0006994	0.0006411	0.0007565					
30	AssestDISCHARGE	Discharge Rate	l/sec	0.707	0.823	0.639	0.530	0.535	0.512	0.380	0.490	0.537	0.699	0.641	0.757					
31	AssestDISCHARGE	Attenuation Rate	m3/hour	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000					
32	AssestDISCHARGE	Storage Capacity	hours	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
33	AssestDISCHARGE	Storage Capacity	days	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
34	AssestHYDROLOGY	HYDRO Q95 for end of Catchment Node (l/sec)	l/sec	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000	14.000
35	AssestHYDROLOGY	Approximate catchment area upstream of DP	%	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330	0.330
36	AssestHYDROLOGY	Inferred Q95%ile (FIXED) at DP (m3/sec)	m3/sec	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620	0.004620
37	AssestHYDROLOGY	Inferred Q95%ile (FIXED) at DP (l/sec)	l/sec	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620	4.620
38	AssestHYDROLOGY	Inferred Q95%ile / month (VARIABLE) at DP (m3/sec)	m3/sec	0.015000	0.007500	0.007000	0.004620	0.004620	0.004620	0.004620	0.007000	0.010000	0.015000	0.015000	0.015000	0.015000	0.015000	0.015000	0.015000	0.015000
39	AssestHYDROLOGY	Inferred Q95%ile / month (VARIABLE) at DP (l/sec)	l/sec	15.000	7.500	7.000	4.620	4.620	4.620	4.620	7.000	10.000	15.000	15.000	15.000	15.000	15.000	15.000	15.000	15.000

