

Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

The licensee may also be requested to provide a response to the Environmental Protection Agency (hereafter referred to as the Agency) in relation to the site visit report findings.

Licensee	
Name of Installation	Kilmihil
Licensee	Uisce Éireann
Licence Register No.	A0091-01
CRO Number	530363
Site Address	Clare
Site Visit Reference No.	SV27299

Report Detail	
Issue Date	13/12/2023
Prepared By	Brian Flynn

Site Visit Detail			
Date Of Inspection	03/11/2023		
Time In	14:15	Time Out	14:50
EPA Inspector(s)	Brian Flynn Dr John Feehan		
Additional Visitors			
Licensee Personnel and Role	Representing Uisce Éireann (UÉ): Lily Santos, Tony Hickey, Representing Clare County Council (working in partnership with Uisce Éireann): Gerard Maher, Michael Hoare.		

> Summary

The Kilmihill wastewater treatment plant is overloaded and is listed as a significant pressure on the Kilmihill stream under the water frame work directive. As the population equivalent of the plant exceeds 500, Uisce Éireann are required to apply for a licence for this agglomeration. The final discharge was found to be discolored and sewage fungus was present at the final discharge point.

Uisce Éireann needs to give this plant greater priority and urgency for upgrading.

Uisce Éireann is required to complete all of the corrective actions as set out in the report within 2 months.

> Site Areas Inspected

Kilmihill waste water treatment plant.

> Documents Inspected

1. Kilmihill effluent monitoring results for 2022 and 2023;
2. Kilmihill ambient monitoring data for 2022 and 2023;
3. Design population equivalent for the waste water treatment plant;
4. Current population equivalent for the waste water treatment plant;
5. Complaint records for 2022 and 2023; and
6. Daily housekeeping records.

> 1. Certificates of Authorisations

	Answer	Condition Number	Non Compliance	Observation
1.1	Is the plant overloaded?	Yes		
Comment / Action Required				
The plant is designed to treat a population equivalent (P.E.) of 500 and is actually treating 536 P.E. A significant storm water overflow was observed at the inlet manhole during dry conditions. The current infrastructure at the Kilmihill plant is inadequate and this plant needs to be prioritised for upgrading.				
	Answer	Condition Number	Non Compliance	Observation
1.2	Is there evidence of pollution at, or downstream of, the discharge point to the receiving water, or along the conduit?	Yes		
Comment / Action Required				
The final discharge point from the Kilmihill waste water treatment plant was found to be discolored and there were significant amounts of sewage fungus in close proximity to the discharge point (see photograph No. 1).				
Upstream and downstream monitoring was submitted by Uisce Éireann, the results indicate that this waste water treatment plant is adversely impacting the receiving water with elevated results for Biological Oxygen Demand and Ammonia.				
	Answer	Condition Number	Non Compliance	Observation

1.3

Has the agglomeration population equivalent collected load increased to 500 p.e or greater?	Yes			
Comment / Action Required				
<p>The plant is designed to treat a population equivalent (P.E.) of 500 and is actually treating 536 P.E. It is a requirement under the European Union (Waste Water Discharge) Regulations 2007 to 2020 that treatment plants that treat a population equivalent greater than 500 require a Waste Water Discharge Licence.</p> <p>Action required:</p> <ol style="list-style-type: none"> 1. Uisce Éireann are required to revert with a timeframe by which you will submit an application for a licence for this agglomeration. 				



2. Water Framework Directive

2.1

	Answer	Condition Number	Non Compliance	Observation
Is the agglomeration categorised as a significant pressure under the Water Framework Directive?	Yes			Yes
Comment / Action Required				
The agglomeration is categorised as a significant pressure under the Water Framework Directive. Ambient monitoring data submitted by Uisce Éireann indicates that the river is significantly adversely impacted as a result of the treatment plant's inability to provide sufficient treatment.				



3. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
3.1	Storm water Overflows not meeting DoECLG criteria	Not Applicable	Yes	Yes
Comment / Action Required				
<p>The Storm water overflow located after the inlet screen (SW002) was reported under the SWO Assessment programme as not being in compliance with the criteria for storm water overflows, as set out in the DoECLG 'Procedures and Criteria in Relation to Storm Water Overflows', 1995.</p> <p>Action required:</p> <ol style="list-style-type: none"> 1. Uisce Éireann are required to ensure that all storm water overflows are in compliance with the criteria for stormwater overflows, as set out in the DoEHLG 'Procedures and Criteria in relation to Storm Water Overflows', 1995 and any other guidance as may be specified by the Agency. 2. Provide a timeline to bring this S.W.O into compliance with the DoEHLG 'Procedures and Criteria in relation to Storm Water Overflows', 1995. 				

	Answer	Condition Number	Non Compliance	Observation
3.2	Waste water treatment plant upgrade.	Not Applicable		
Comment / Action Required				
<p>The current infrastructure at the Kilmihil wastewater treatment plant is inadequate and cannot provide adequate treatment. Uisce Éireann stated in the latest Compliance Investigation update that there is a upgrade planned for Kilmihil under the small town and villages programme and that they planned to submit a planning permission application by Q4 2023.</p> <p>Uisce Éireann are required to:</p> <ol style="list-style-type: none"> 1. Uisce Éireann shall ensure that the Kilmihil treatment plant is given greater priority for upgrading. 2. Provide an update on the planning permission submission. 				



Photograph No. 1: Kilmihil wastewater treatment plant final effluent discharge point. Sewage fungus was observed in close proximity and the final discharge was observed to be discoloured.

FOLLOW-UP ACTIONS

The licensee is required to complete the actions outlined in this site visit report within the specified timeframes. Where required, the licensee shall also respond to actions specified in Compliance Investigations and/or submit a response to this site visit report via the EDEN system. The licensee shall maintain a documentary evidence, for review by the Agency, that the prescribed actions were completed within the required timeframe.

(i) Compliance Investigations

The Agency may generate a Compliance Investigation through the EDEN system and issue instructions and actions to the licensee. The licensee will receive notification when an instruction or action is issued and the licensee must respond to the actions within the Compliance Investigation within the specified timeframe.

(ii) Response to Site Visit Report

Where the licensee is requested to (or wishes to) respond to the Agency in relation to this site visit report, the licensee may select the 'Make a Response' link on the Site Visits page in EDEN where a .pdf document containing the response can be attached and submitted. The response should include details of the actions taken by the licensee to address the issues raised in this site visit report and the target completion dates. This Licensee Public Response provides the licensee with an opportunity to inform both the Agency and the public about the implementing of actions set out in the Agency site visit report. The response must be submitted **within 21 calendar days** of the issue date of this site visit report.

(iii) Publication of Reports

This site visit report will be published on the EPA's website, www.epa.ie, 30 calendar days after the site visit report issue date.

Any licensee response to this site visit report will be published on the EPA's website simultaneously (i.e. 30 calendar days after the site visit report issue date).

Please note that licensees are required to comply with the conditions of the licence at all times, and where non-compliance occurs, compliance must be restored within the shortest possible time. These actions will be verified during subsequent Agency visits. Please quote the above Inspection Reference Number in any correspondence in relation this Report.