

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	Clareabbey
Licensee	Uisce Éireann
Licence Register No.	D0199-01
CRO Number	530363
Site Address	Clare
Site Visit Reference No.	SV30513

Report Detail	
Issue Date	18/11/2024
Prepared By	Brian Flynn

Site Visit Detail			
Date Of Inspection	10/10/2024		
Time In	11:30	Time Out	13:55
EPA Inspector(s)	Brian Flynn Paul Costello		
Additional Visitors			
Licensee Personnel and Role	Representing Uisce Éireann: Derek O'Toole, Patrick O Connor, Colm Clohessy, and Teresa Burke. Representing Clare County Council (working in partnership with Uisce Éireann): Brian Cleary.		

> Summary

The Clareabbey WWTP is currently overloaded with a population equivalent of 6,150 with a reported design capacity of 6,000. The flow to the aeration basin is limited at 145 m³/hr, flows greater than this are diverted to the storm tank. This lack of capacity is resulting in storm water discharge events on 243 days out a total of 282 days from the (01/01/2024 to the 08/10/2024).

A review of this licence is required to regularise the Clarecastle and SWO's not included in the current licence into the Clareabbey Wastewater Discharge licence.

Uisce Éireann are required to prioritise the upgrading of the Clareabbey Wastewater Treatment Plant to ensure that unauthorised frequent storm water discharge events are ceased and adequate capacity is provided.

> Site Areas Inspected

- Wastewater treatment plant,
- Quay road pumping station.

> Documents Inspected

- Data on the current and design population equivalent,
- Sludge management records 2023 to-date,
- Critical asset list,
- Final effluent monitoring data 2023 to-date,
- Ambient monitoring data 2022 to-date,
- A map of the agglomeration,
- A list of pump station locations,
- Storm tank SWO records 2023 to-date.

> 1. General

1.1

Have you had any emission limit value breaches in the past 12 months?

Answer

Yes

Condition
Number

Non
Compliance

Observation

Comment / Action Required

The Clareabbey WWTP has recorded repeated breaches for Total Phosphorous, recording a total of 5 breaches so far in 2024.

A ferric dosing system was installed in June 2024. However, breaches have occurred in July and August.

Total Phosphorous non-compliant effluent monitoring results:

26/04/2024- 2.9 mg/L (ELV 2mg/L);

31/05/2024: 2.95 mg/L (ELV 2mg/L);

20/06/2024: 2.9 mg/L (ELV 2mg/L);

23/07/2024: 4.1 mg/L (ELV 2mg/L);

29/08/2024: 2.2 mg/L (ELV 2mg/L);

Uisce Éireann are required to:

- Optimise the ferric dosing system to meet the licenced ELV for Total Phosphorous.
- Maintain and operate the system so that it complies with the ELV for Total Phosphorous at all times and is part of a preventative maintenance plan.



2. Aeration Basin

2.1

	Answer	Condition Number	Non Compliance	Observation
Is there good evidence of mixing in the aeration basin?	No			
Comment / Action Required				
<p>The aeration tank at the Clareabbey WWTP contains fine bubble air diffusers. It was noted that a diffuser in the corner of the tank did not appear to be working satisfactorily (see photograph No. 1).</p> <p>Excess sludge and rags were observed to have accumulated throughout the aeration basin. Uisce Éireann personnel stated that ragging entered the aeration tank prior to the commencement of the new inlet works may be causing the uneven distribution of air.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• Complete a profile of the dissolved oxygen levels across the aeration tank to establish if the oxygen delivery system is operating adequately, implement the necessary changes to ensure that diffused oxygen levels are uniform across the aeration basin.				



3. Site Specific Issues

3.1

	Answer	Condition Number	Non Compliance	Observation
SWO located at Quay road pumping station.	Checked			
Comment / Action Required				
<p>The Quay Road pumping station was visited. This pump station connects Clarecastle to the Clareabbey WWTP.</p> <p>There is no storm storage at this pump station. The pump station has a storm water overflow which discharges into the Fergus estuary, no storm water overflow records were available for inspection at the time of this site visit. This overflow is not listed in the current licence for the Clareabbey agglomeration.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• Confirm whether the SWO has been assessed against the DoEHLG criteria.• Submit SWO data for the Quay Road PS for the period March to October 2024.• Apply for a licence review to regularise all overflows into the WWDL for the Clareabbey agglomeration.				

3.2

	Answer	Condition Number	Non Compliance	Observation
Lack of Organic capacity at the WWTP.	Yes			Yes
Comment / Action Required				
<p>The Clareabbey Waste Water Treatment Plant (WWTP) is currently overloaded with a reported design capacity of 6,000 serving a population equivalent (P.E) of 6,150.</p> <p>The inlet works at the WWTP were upgraded to a design capacity of 10,900 PE. The treatment plant requires a upgrade to this capacity inline with the inlet works to prevent flows greater than 145 m3/hr being sent to the storm tank from which overflows are frequent (see section 3.5).</p> <p>Uisce Éireann stated no funding has been approved to upgrade this plant and is unlikely to occur under the RC4 capital investment plan from 2025 to 2029.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• Give the upgrade of the Clareabbey WWTP greater priority.				

3.3

	Answer	Condition Number	Non Compliance	Observation
Odour complaint about the Clareabbey WWTP.	Checked			Yes
Comment / Action Required				

A complaint was received by the EPA on the 28/09/2024 relating to an odour from the Clareabbey WWTP.

Uisce Éireann stated that no issues were noted at the treatment plant at that time. However, it was noted that an odour survey was not conducted. Uisce Éireann further stated that they had received complaints from local elected representatives regarding suspected odours arising from the treatment plant. Uisce Éireann investigations to date have not identified odour sources from the WWTP.

Uisce Éireann are required to:

- Ensure that an Uisce Éireann Representative visits the waste water treatment plant immediately after receipt of any alleged odour complaints, and conduct an odour survey to establish whether the plant is giving rise to odours off-site.
- Maintain records of all surveys for inspection by Agency staff. Any personnel undertaking such surveys should be appropriately trained, adhere to EPA Air Guidance document AG5, follow a standard procedure/protocol and all surveys should commence offsite and upwind.

3.4

	Answer	Condition Number	Non Compliance	Observation
Review of the Clareabbey WWDL.	Checked			Yes

Comment / Action Required

Documentation submitted by Uisce Éireann prior to the site visit indicated that there are no network SWOs in the Clareabbey agglomeration. However, the SWO Assessment Programme states that there is a network SWO located at the R458 roundabout (Clare Rd/College View/Tobartescain).

Site visit documentation titled "2024-10-08 Clareabbey PS" also stated that the pumping station at Westfields estate has an emergency SWO. However, this overflow was not assessed under the national SWO assessment programme.

The EPA Inspector questioned whether Uisce Éireann had applied for a licence review to regularise the Clarecastle agglomeration into the Clareabbey licence, Uisce Éireann were unable to confirm whether they were planning to submit a licence review for this agglomeration.

Post the site visit Uisce Éireann stated the following "*The UE Waste Water Discharge Authorisation (WWDA) Team are presently preparing a Waste Water Discharge Licence (WWDL) Review Application for Clareabbey WW Agglomeration. The review application is being made to extend the Agglomeration boundary to include the existing Clarecastle WW Agglomeration. The effluent from Clarecastle is now being pumped into Clareabbey WWTP for treatment. The review application will also request the inclusion of all Storm Water Overflows & Emergency Overflows from Clarecastle into the Clareabbey WW Agglomeration & WWDL. It is hoped that the WWDL Review Application will be lodged with the EPA in early 2025.*"

Uisce Éireann are required to:

- Clarify whether there is a network SWO located at the roundabout on the R458 Clare Rd/College View/Tobartescain.
- Provide a timeline to assess all overflows in the agglomeration with the DoEHLG criteria.
- Ensure that the licence review application (to regularise the Clarecastle agglomeration into the Clareabbey licence) occurs in a timely manner, and includes SWO's in the Clareabbey agglomeration that are not licensed.
- Assess all SWO's in the agglomeration with the DoEHLG criteria.

3.5

	Answer	Condition Number	Non Compliance	Observation
SWO discharges as a result of RAS pump capacity.	Checked			Yes

Comment / Action Required

It was stated by Uisce Éireann personnel that at times where the Quay street and Westfields pump stations are pumping at the same time to the inlet works, flows post screening are split between the aeration basin and the storm tank. The flow to the aeration basin is limited at 145 m³/hr due to capacity of the RAS pump. Any excess flows above 145 m³/hr, are diverted to the storm tank where it remains until it can enter the aeration basin or overflows when the storm tank reaches capacity.

During the site visit it was observed that incoming flows were sent to the storm tank during dry weather conditions. Diverting flows to the storm water holding tank during dry weather is not best practice as it reduces the volume that the storm tank can hold during storm events.

Storm Water Overflow records were requested prior to the site visit and were submitted post the site visit. Upon examination of these records, it was determined that there have been repeated storm water discharge events from the storm tank in 2024 i.e. there were 243 days where a discharge occurred between 01/01/2024 to the 08/10/2024 (a period of 282 days).

Uisce Éireann are required to:

- Ensure all storm water overflows are assessed and meet the Department of Environment Procedures and Criteria in relation to storm water overflows.
- Provide a timeline to upgrade the RAS pump to provide adequate capacity to prevent the diversion of flows to the storm tank.
- Prioritise the upgrade of the WWTP to ensure that the WWTP has capacity to provide adequate and appropriate treatment to all influent.



Photograph No. 1: A corner of the aeration tank that did not appear to be oxygenated.

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.