Comment on the 'Review on the Technical Memorandum on Effluent Standards'

Flow band system

We are concerned about the relaxation of the discharge standards resulted from the proposed revisions on the flow band system, and their possible adverse effect on the receiving waters. The proposed range of sewage discharge flow rate at the 100-1000 m^3/d band is large, and the high discharge rate at the upper end of the band may have great impact on the receiving system. A low discharge standard for this band results in relaxation of some of the standards from the existing TM at the higher discharge flow rate. For example, the proposed TM sewer standard of Mercury at the 100-1000 m^3/d flow band is 0.1 mg/L, which is much relaxed from the existing standard of 0.001 mg/L for the 400-600, 600-800 and 800-1000 m^3/day bands. We suggest that additional information including distribution of the amount of discharge within the proposed 100-1000 m^3/d should be given to assess if the new flow band system is environmentally acceptable or further subdivision of the flow band is required so as to ensure our receiving waters would not be too much overloaded with pollutants.

Sewer discharge standards

We are also greatly concerned about the proposed relaxation of the sewer discharge standards of Oil and Grease, since O & G can easily accumulate and reduce the efficiency of sewerage system. Moreover, we have reservation about the relaxation of the standards of copper and other toxic metals, and the repealing of the prohibition of discharge of petroleum-hydrocarbon to sewer. These substances are toxic to both human and other aquatic organisms and can easily bio-accumulate in the living tissues to cause chronic toxic effects. Furthermore, the effectiveness of the existing sewage treatment facilities to remove the possible increased level of these toxic substances resulted from the TM standard relaxation has yet to be shown. Unless further proof is demonstrated to show the effectiveness and capacity of the sewage treatment facilities now available in Hong Kong, the above relaxation would have subsequent detrimental impact on the receiving waters.

Inland and coastal waters discharge standards

We welcome the listing of zinc as toxic metal. We also welcome the tightening of some effluent standards on inland and coastal waters such as the *E. coli*, phenols, cyanide and mercury standards. However, we are concerned about the increase of the total toxic metals (TTM) standard for discharge to Group I inland waters from the existing 0.3-0.2 mg/L to 1 mg/L. Since the Group I inland water is for human consumption, water quality should be kept as high as possible. The large relaxation of TTM may directly and adversely affect human health through consumption, and other aquatic organisms in the receiving waters.

Others

Also, we found the definitions of the new coastal waters grouping confusing. We should be grateful if you would provide maps indicating each new coastal water group. Finally, we should appreciate it if you would provide members of the Consultative Meetings with explanation of the rationales underlying the proposed TM revision together with supporting data.