



# Atlantic Shellfish Ltd.

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Sub 6  
Office  
LS

Environmental Licensing Programme,  
Office of Climate, Licensing and Resource Use,  
Environmental Protection Agency,  
P.O.Box 3000,  
Johnstown Castle Estate,  
Co. Wexford,  
Ireland.

4<sup>th</sup> July 2008

Dear Sirs,

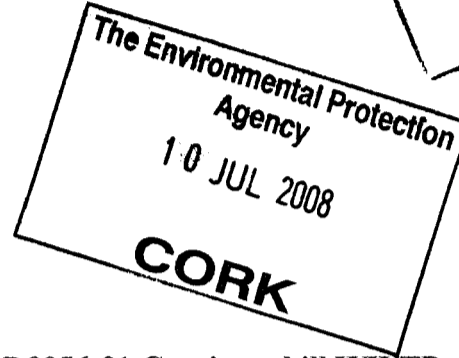
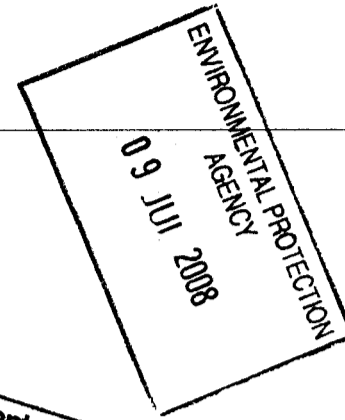
## Waste Water Discharge Licence Application D0056-01 Carrigtwohill WWTP

Further to our submission of 28<sup>th</sup> March; to Cork County Council's Revised Application posted on your website on 26<sup>th</sup> May and to my letters to Dr. Suzanne Monaghan of 24<sup>th</sup> April and 27<sup>th</sup> May, which she said she was passing on to you as referring to the above application, I am concerned that they have not been posted on the website, nor that I cannot get a reply from you on the seeming inadequacy of the County Council's monitoring programme to show up storm overflows from the two storm overflow tanks at Bailick 1 & 2 pumping stations.

I think it is very important that I register with you that it would appear that there has been little observable benefit from the County Council's infiltration remediation programme last year. This would support our observations over the years that the greater the flow that enters the WWTP, the greater the BOD load. Clearly infiltration should dilute what would be expected to be, a constant daily load of sewage.

I understand that the remediation was completed in the summer of 2007 and that the Dwyer's Road pumping station, which was constructed to avoid the sewage from the north-west of Midleton having to be pumped under the river, where major infiltration was suspected, began pumping into the WWTP on 12<sup>th</sup> September 2007. Yet, three months after all this work was completed and tested by not abnormally high rainfall in January this year, the storm overflows were as bad as they ever were.

I enclose again the figures for the storm overflows for January this year, which were 76,131m<sup>3</sup> (76,131 tons or 76 million litres - whatever the public may best understand). You can see from the following table that they were unchanged from the huge storm overflows of the 2006/07 winter.



**Storm Overflow data for winter 2006/07**

Month	Rainfall (mm)	No. >40m3	Total vol. m3	Av. spills/day	Av.vol/day m3
Oct-06	151.8	55	64,272	1.8	2,073
Nov-06	173.2	57	75,589	1.9	2,520
Dec-06	160.7	62	155,327	2.0	5,011
Jan-07	70.0	50	52,891	1.6	1,706
Feb-07	136.9	53	80,202	1.9	2,864
Mar-07	76.7	57	68,022	1.8	2,194
Apr-07	37.3	19	5,841	0.6	307
May-07	57.3	19	6,408	0.6	337
Jun-07	161.1	25	18,571	0.8	743
Jul-07	106.8	36	13,873	1.2	385
Aug-07	85.4	19	9,450	0.6	497
Sep-07	28.8	5	1,310	0.2	262
Oct-07	46.6	24	6,948	0.8	290
Nov-07	58.4	15	3,746	0.5	250
Dec-07	92.9	24	9,828	0.8	410
Jan-08	155.4	54	76,131	1.7	1,410



It has often claimed been claimed by the County Council and their consulting engineers that these storm overflows have had the “first flush” of sewage settled out in the storm tank and what reaches the river is extremely dilute. This certainly no longer applies at Middleton, where the tanks are overflowing every day and the cells are full. In fact the bacteriological concentrations in the Bailick 1 storm tank were as least as high as the sewage entering the WWTP :

**Faecal coliform concentration of influent to WWTP and storm tank overflows to river.**

Date	Influent to WWTP (f.c./100ml)	Storm overflows to river (f.c./100ml)
04.01.08	7,000,000	4,000,000
11.01.08	520,000	1,800,000
18.01.08	<1,000,000	20,000,000
25.01.08	2,100,000	1,500,000

I am copying this letter to the Legal Unit in DG Environment, Brussels, as I know they are aware of the infiltration remediation programme and they will be as disappointed as we are that it does not appear to have made any difference.

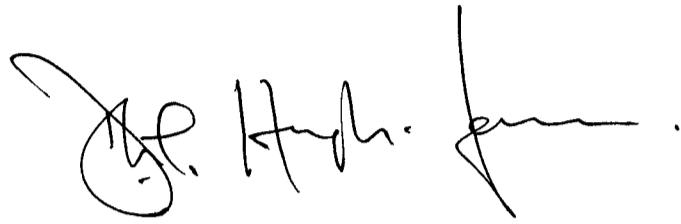
They are also aware of your website and the transparency with which the process of Waste Water Licensing and involvement of the public should be being carried out and I was hoping that your own correspondence with Cork County Council would be being posted up, as it appears to be being put on the website for Westport WWTP and other Co. Mayo applications. Could I ask you please to do this.

There may also be others watching your Midleton WWDL website, who will be equally dismayed at what is still going on in Midleton, when they gave up most of last summer to the inconvenience of the main street being dug up and thus I would be grateful if you can not only take these observations into account in determining the WWDL's for Midleton, but will also post them on the website.

I would be grateful for your confirmation.

With many thanks.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D.L.I. Hugh-Jones'. The signature is fluid and cursive, with a large initial 'D' and 'H'.

D.L.I. Hugh-Jones

Copy with attachments to the Legal Unit, DG Environment, Brussels

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Date	Volume pumped to river from Bailick No. 1 pumphouse m3	Volume pumped to river from Bailick No. 2 pumphouse m3	Volume pumped to river from Ballinacurra No. 2 pumphouse m3	Total volume of storm effluent pumped to river m3	Volume pumped to treatment plant m3	Total volume arising in scheme + treated effluent m3	Storm discharge as percent of total volume %	Bailick No. 1: storm pump No. 1: hours run
01-Jan-08	277.20	0	0	277	5,156	5,433	5	0.00
02-Jan-08	277.20	0	0	277	4,745	5,022	6	0.10
03-Jan-08	178.20	0	0	178	5,005	5,183	3	0.02
04-Jan-08	198.00	0	0	198	4,730	4,928	4	0.03
05-Jan-08	2970.00	648	0	3,618	4,611	8,229	48	0.51
06-Jan-08	198.00	209	0	407	4,983	5,390	8	0.03
07-Jan-08	475.20	598	0	1,073	4,587	5,660	21	0.08
08-Jan-08	247.80	497	0	715	5,448	6,163	13	0.04
09-Jan-08	1663.20	504	0	2,167	5,213	7,380	32	0.27
10-Jan-08	10276.20	866	0	12,343	3,169	15,512	92	1.71
11-Jan-08	4237.20	886	0	5,123	6,138	11,261	49	0.72
12-Jan-08	4494.60	302	0	4,797	4,519	9,316	53	0.75
13-Jan-08	5801.40	1,152	0	6,953	6,133	13,086	58	0.97
14-Jan-08	2811.60	425	0	3,236	5,418	8,654	39	0.46
15-Jan-08	2732.40	468	0	3,200	6,033	9,233	37	0.47
16-Jan-08	1560.40	367	0	2,308	6,453	8,761	27	0.31
17-Jan-08	1527.40	65	0	1,609	6,619	8,228	20	0.28
18-Jan-08	2098.80	29	0	2,128	6,766	8,894	24	0.33
19-Jan-08	3029.40	72	0	3,101	6,769	9,870	32	0.52
20-Jan-08	3742.20	583	0	4,325	5,706	10,031	46	0.62
21-Jan-08	3088.80	29	0	3,118	5,597	8,715	36	0.51
22-Jan-08	3781.80	554	0	4,336	5,972	10,308	44	0.64
23-Jan-08	2553.20	180	0	2,734	6,693	9,427	30	0.44
24-Jan-08	1742.40	295	0	2,038	6,932	8,970	23	0.29
25-Jan-08	1108.80	245	0	1,354	7,042	8,396	17	0.17
26-Jan-08	6745.40	252	0	1,697	7,945	9,642	18	0.25
27-Jan-08	673.20	108	0	781	6,342	7,123	11	0.12
28-Jan-08	673.20	101	0	774	6,393	7,167	11	0.11
29-Jan-08	316.80	0	0	317	7,298	7,615	4	0.04
30-Jan-08	693.00	137	0	830	7,802	8,632	10	0.13
31-Jan-08	118.80	0	0	119	7,519	7,638	2	0.02
<b>Totals</b>	<b>65359.80</b>	<b>10771.20</b>	<b>0.00</b>	<b>76131.00</b>	<b>183736.00</b>	<b>259867.00</b>	<b>31</b>	<b>10.94</b>

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DATE	DB1		DB2		DB3		DB4		DB4A		DB5		DB6		DB7	
	INFLUENT	INFLUENT	PRE UV	PRE UV	POST UV	POST UV	BABYS WALK	BABYS WALK	STORM	STORM	INDUSTRIAL	INDUSTRIAL	RATHCOURSE	RATHCOURSE	BALLINACURR	BALLINACURR
	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL	FAECAL
04/01/08	11,000,000	7,000,000	210,000	110,000	280	280	2,000	1,600	4,000,000	4,000,000	1,300	1,300	300	300	1,100	440
11/01/08	860,000	520,000	19,000	15,000	30	30	2,200	1,100	1,800,000	1,800,000	24,000	24,000	24,000	24,000	570	570
18/01/08	<1,000,000	<1,000,000	110,000	110,000	<1	<1	500	100	20,000,000	20,000,000	480	480	250	250	<10	<10
25/01/08	5,300,000	2,100,000	48,000	9,600	7	7	500	100	1,500,000	1,500,000	1,500	1,500	500	500	430	260

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