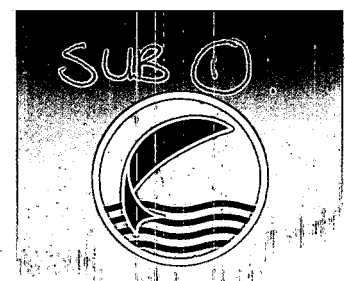


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Eastern Regional Fisheries Board

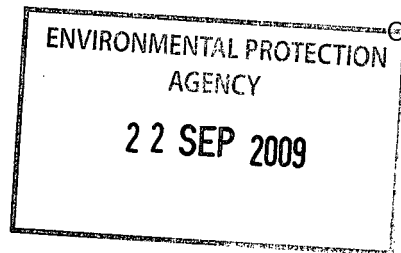
Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland

Our Natural Heritage

Office of Climate, Licensing and Resources,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford



Our Ref: MK/3b

September 17th, 2009

Re: Waste Water Discharge License Application in respect of Agglomeration Named Castleblayney Waste Water Treatment Plant. Ref: D0205-01

Dear Sir/Madam,

We refer to the above-mentioned application for a waste water discharge licence at Castleblayney WWTP, Co. Monaghan. The Board welcomes the licensing of discharges from this WWTP.

However there are some issues which we feel must be raised in relation to some sections of the application. Namely attachment No. F1 which examines possible effects on the receiving watercourse. Specifically that section which calculates proposed ammonia concentration limits in the effluent.

The revised assimilative capacity calculations for ammonia continue to use the average flow of the receiving waters when calculating the effluents effects upon the receiving water. Ammonia can be highly toxic to aquatic fauna at relatively low concentrations. For this reason, it is pertinent and common practise to calculate assimilative capacities regarding ammonia in low flow conditions. Allowing the proposed effluent concentration limit of 25mg/l NH4 could have disastrous consequences to aquatic life during low flow conditions in Lough Muckno and further downstream in the Fane itself. Besides that Lough Muckno has been classed as at risk of not achieving at least good status by 2015, which is the core objective of the Water Framework Directive. Allowing such a discharge would mean that the lake would not achieve good status as per schedule 5 of The Surface Water Regulations (S.I. No.171 of 2009). Also, within this section a figure of 0.5mg/l was provided as a maximum allowable concentration of ammonia in a salmonid river. It is unclear where this figure was obtained and so should be defined.

Given the fact that the WWTP's primary receptor, Lough Muckno, is listed as a sensitive water under the Urban Waste Water Treatment Regulations and that it has also recently

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been categorised as hypereutrophic by the EPA, it would be apt to require particularly stringent quality standards for the treated effluent to ensure that, at the very least there is no further deterioration of water quality in Lough Muckno and subsequently the Fane itself.

Lough Muckno itself is a valuable fishery. The lake holds good stocks of both coarse and salmonid fish and along with the larger Fane catchment is a very valuable resource. The river holds good stocks of Brown Trout, Salmon and Sea Trout. In fact, this is the only river on the east coast, which is open for angling, i.e. there are sufficient numbers of Salmon and Sea Trout returning to the river to allow for recreational fishing.

We trust you will take our observations on board when assessing this application.

Yours faithfully,

Michael Kirwan S.E.O.

PP

Pat Doherty,
Chief Executive Officer

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