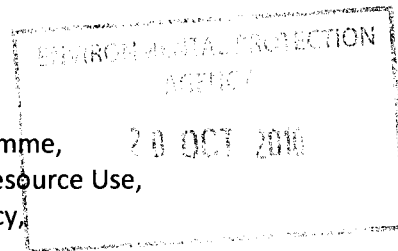


Administration,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Our Ref: MK/12e

19th October, 2010

**Re: Scotstown Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. D0494-01**

Dear Sir/Madam,

We refer to the application made by Monaghan County Council for a waste water discharge licence in respect of the waste water treatment plant at Scotstown, Co. Monaghan.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.*

Having examined the application documents we have the following observations to make:
Section F: Existing Environment & Impact of Discharge

Biological monitoring: The applicant refers to the EPA station 0500 (1km u/s Scotstown). We wish to point out that this site is located on the Scotstown River as opposed to the Blackwater River itself, this should be made clear in the application.

As there are no EPA biological monitoring stations upstream of Scotstown on the Blackwater River we would suggest that the applicant should carry out a Biological assessment upstream of Scotstown.

The most recent EPA biological monitoring results, available on the EPA website, at Station 0130 1.5km d/s Scotstown in 2007 was Q4. The Blackwater River is due to be monitored again this year, 2010. This information should be updated in the application.

Water quality monitoring –Monitoring results, upstream and downstream, are provided by the applicant in Tables 2&3, Attachment E. We note the following:

- Only one sampling occasion when NH₃-N results are provided.
- High Ortho P(mg/l P) results in 2008, which are significantly higher than with the EPA monitoring results (River Quality Report, 2008)

The EPA Monaghan Regional Inspectorate has monitored sites upstream and downstream of the discharge for some years and the results are contained in the annual River Quality Reports. Given the frequency of sampling carried out by the EPA we would recommend that these results are used when assessing the impact of the discharge on the receiving water.

Having carried out a mass balance calculation based on the information provided by the applicant and the EPA monitoring results (River Quality Reports, 2008) we noted a potential significant increase in Ortho-P levels in the receiving water downstream of the discharge.

Note: Ortho P levels in the effluent, contained in Table 1, Attachment E4 range from 11.929mg/l P to 2.39mg/l. This wide variation in results should be addressed.

We note that the lower limit of detection for B.O.D. analysis is 2mg/l; we would suggest that a limit lower than 2mg/l should be sought given the standards set in the EC Environmental Objectives (Surface Waters) Regulations, 2009.

As the EC Environmental Objectives (Surface Waters) Regulations, 2009 have been adopted since the application was made we would suggest that the assimilative capacity calculations in the application should now include comparison with the EQS in the new regulations.

We note in Drawing No. 4, Attachment B3 that there appears to be an error in the labelling of the upstream and downstream monitoring locations.

Fisheries value of the receiving water

From a fisheries perspective the receiving water, the Monaghan Blackwater River, is valuable natural resource. The river holds stocks of Brown Trout, Eels, Lamprey, Gudgeon, Stoneloach, Minnow and 3-spined stickleback.

It is also worth noting that in the River Blackwater, since drainage works were carried out, water levels are very often particularly low during dry periods. This impacts on the fish holding capacity of the river in localised areas and may also impact on the assimilative capacity of the river in these areas.

Given the value of fisheries/aquatic habitat of the Monaghan Blackwater River it is vital that appropriate discharge limits are set in this licence to ensure that there is, at the very least, no deterioration of existing conditions, in accordance with Article 5 of EC Environmental Objectives (Surface Waters) Regs, 2009 (S.I. 272 of 2009), which includes the following provision:

- A public authority shall not, in performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status (or ecological potential as the case may be) of a body of surface water.

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

Yours faithfully,

Michael Kiwanu OFEO.

PP

William Walsh,
Director – Eastern River Basin District