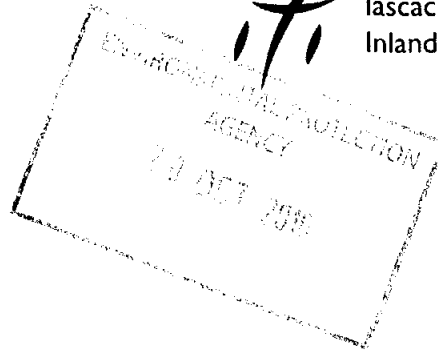


D0463-01



Iascach Intíre Éireann
Inland Fisheries Ireland



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

Our Ref: MK/12b

19th October, 2010

**Re: Knockaconny Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. D0463-01**

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 Knockaconny, 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

Flow monitoring data – the applicant states that the nearest station is at Faulkland Bridge (OPW Station 0351). A search of the OPW hydro data website, which was carried out today, revealed that there is only one site on the Blackwater (Monaghan) at Cappog Bridge (OPW station 03058). This issue should be addressed by the applicant.

Biological monitoring: The most recent EPA biological monitoring results, available on the EPA website, for the Blackwater (Monaghan) sites are as follows:

- Station 0510 250m d/s Br near Milltown in 2007 was Q3-4.
- Station 0650 Faulkland Br (Upr) in 2007 was Q3

The Blackwater River is due to be monitored again this year, 2010. This information should be updated in the application.

Note: A Q value of 3 has a pollution status of Moderately Polluted, as opposed to Unpolluted, as stated in the application (pg 28 of 43)

Water quality monitoring –Monitoring results, upstream and downstream, are provided by the applicant in Tables 2&3, Attachment E. We note there was only one sampling occasion when Ortho P (mg/l P) results are provided. A larger number of samples analysed for Ortho-P levels would give a more accurate reflection of receiving water quality.

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 increase in Ortho-P levels in the receiving water downstream of the discharge.

We note that NH₃-N levels in the effluent, contained in Table 1, Attachment E4 range from 26.61mg/l P to 0.04mg/l. This wide variation in results should be addressed. This parameter is particularly pertinent from a fisheries perspective, given its toxicity to aquatic life.

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.

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,

f.p.


William Walsh,
Director – Eastern River Basin District