

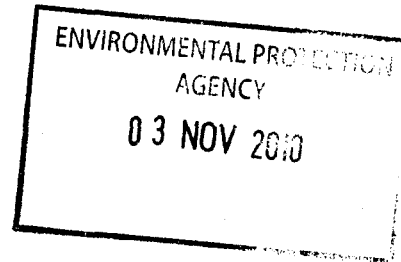
SUB No 1,

A0037-01



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/12a

2nd November, 2010

**Re: Tyholland Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Certificate of Authorisation
Register No. A0037-01**

Dear Sir/Madam,

We refer to the application made by Monaghan County Council for a waste water discharge certificate of authorisation in respect of the waste water treatment plant at Tyholland, 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 E – Monitoring

We note regarding the Final Effluent results (page 24 of 37) that the applicant refers sampling data tabled in Attachment E4; this attachment is not contained in the application documents available on the EPA website.

Section F: Existing Environment & Impact of Discharge

Water Quality and Biological monitoring:

The receiving water, a tributary of the Silver Stream River, is a tributary of the Cor River. We note that the nearest EPA monitoring sites are located on the Monaghan Blackwater main channel, which is upstream of the confluence with the Cor River. Given the lack of monitoring data available in relation to the Silver Stream River a detailed monitoring programme should be established in order to obtain a more accurate assessment of water quality in the receiving water. This programme should include water quality and biological monitoring.

Water quality monitoring – monitoring results for river water quality upstream and downstream are provided by the applicant in Attachment F1. We note 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.

We note that due to lack of flow data on the receiving water the applicant was unable to carry out the assimilative capacity calculations, as required in the Application Guidance Notes. This information should be sought in order to obtain an accurate reflection of the

impact of the discharge on the receiving water. Assimilative capacity calculations in the application should include comparison with the EQS in the EC Environmental Objectives (Surface Waters) Regulations, 2009.

Fisheries value of the receiving water

From a fisheries perspective the receiving water, a tributary of the Silver Stream River, which is a tributary of the Cor River, is valuable natural resource. The Cor River holds stocks of Brown Trout.

Given the value of fisheries/aquatic habitat of the Cor Rivers it is vital that appropriate discharge limits are set in this licence to protect the aquatic habitat.

We would also urge compliance 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,

PP. *Michael Kiwan S.F.E.O.*

William Walsh,
Director – Eastern River Basin District

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