

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

23rd August 2011

The Environmental Protection
Agency
26 AUG 2011
CORK

Scanned

28 AUG 2011

Open Web Doc

Initials: _____



Re: Waste Water Discharge License Application by Cork County Council Southern Division in respect of waste water discharges from Agglomeration named Castlemartyr.

Dear Sir/Madam,

Thank you for your letter of acknowledgement dated 22/08/2011 in relation to a letter of complaint dated 17/08/2011 sent by Womanagh Angling & Development Association, which you have taken as a submission in relation to the Waste Water Discharge License Reference **No D0134-01** by Cork County Council Southern Division in respect of waste water discharges from Agglomeration named Castlemartyr.

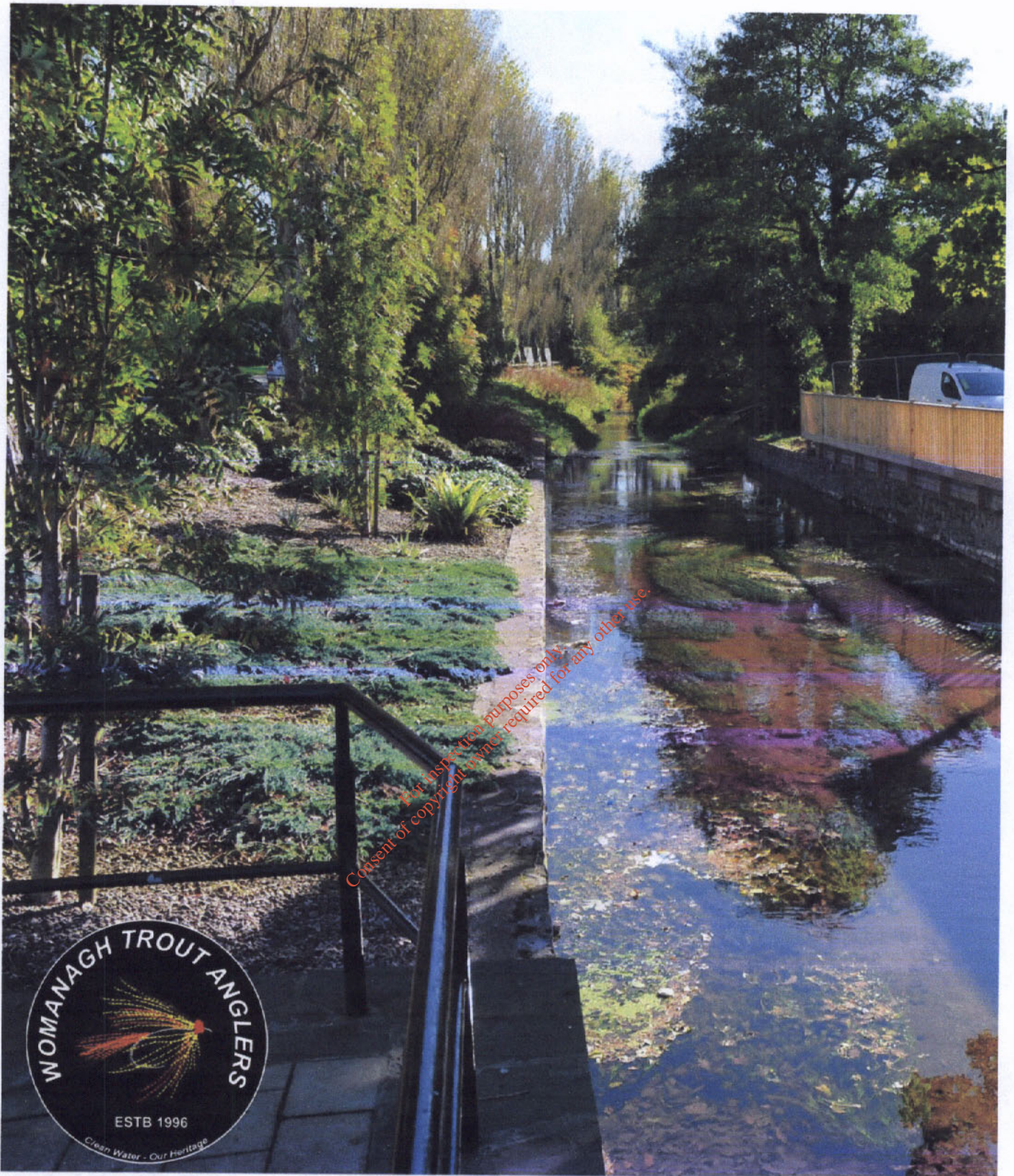
Please find enclosed a further submission detailing incidents at the same WWTP dating from June 2008 and includes the most recent incident in August 2011. This forms a more comprehensive report of incidents for which we have some evidence either photographic or written. We have not included other incidents which have been witnessed locally but not documented.

We hope you will accept this new submission in conjunction with the previous letter mentioned above.

Yours sincerely,

Denis Long Hon. Sec. Womanagh Angling & Development Association

ENVIRONMENTAL PROTECTION
AGENCY
25 AUG 2011



18 August, 2011

Kiltha River, Castlemartyr, Co Cork

Incident Report and Submission

(Noxious Discharges into the Kiltha River from
Castlemartyr Waste Water Treatment Plant 2008 - 2011)

ENVIRONMENTAL PROTECTION
AGENCY

25 AUG 2011

Produced by: Womanagh Angling & Development Association

Incident report on Castlemartyr WWTP for the period January 2008 – August 2011

Recent Incident Ref: PAE2011/115 Castlemartyr WWTP



Prepared by: Womanagh Angling & Development Association (WADA)
Report Date: 18/8/11
Author : David Burke, Environmental officer WADA
Tel: 086 8588034 email: burkesat37@gmail.com

Purpose of this document:

This document forms part of a submission by Womanagh Angling & Development Association along with other related documents and photographs, in respect of the Waste Water Discharge Licence (D0134-01) application for Castlemartyr Waste Water Treatment Plant.

This reports chronicles a series of regular incidents of pollution of the Kilha river, Castlemartyr, Co Cork caused by discharge from the Castlemartyr WWTP operated by EPS Ltd, Quarters town Ind Est, Mallow on behalf of Cork County Council. Not all incidents may have resulted in a pollution report to Cork county council as

- a) in many cases the incidents are too numerous or were observed very early in the morning/late at night or at weekends
- b) abnormal discharge seen by concerned locals may have ceased by the time the plant operators arrived to investigate. If EPS did not see it, it did not exist!

Context:

We feel this plant does not function at an acceptable standard and has not done so for a number of years (since 2008 at least).

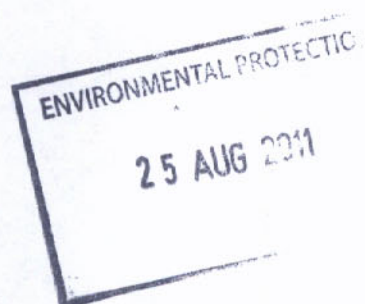
Discharge contaminated with solids and foul smelling substances has become a regular event and appears to be acceptable to Cork County Council. It is not acceptable to the local community and to anyone who is concerned for the environment and wildlife which is affected by these discharges.

As a local group dedicated to the protection and enhancement of our local waters and wildlife as well as promotion of respect for the environment among our young people, we are sickened at the seemingly blasé attitude of Cork County Council to the pollution of our river and its environs.

We note from an application by Cork County Council in 2008 for Waste Water Discharge License application for the Agglomeration of Castlemartyr, Co. Cork that

"The current operator is contractually obliged to perform the Operation of the WWTP in accordance with the Performance Management System and to maintain the design performance capability of the existing treatment plant. Further measures planned to comply with the general principle of the basic obligations of the operator, i.e., that no significant pollution is caused."

This they have patently failed to do as our report and associated photographic evidence proves.



Incident Chronology

Incident Date	Incident description	Reported by	Written Evidence of incident Y/N	Photo Y/N
03/06/08	Sludge discharge to river	WADA	Y	N
04/08/08	Sludge discharge to river	WADA	Y	N
04/10/09	Sludge discharge to river	WADA	Y	Y
03/05/10	Sludge discharge to river	WADA	Y	N
18/05/10	Discoloured discharge to river	WADA	Y	Y
26-27/05/10	Discoloured discharge to river	WADA	Y	N
08/04/11	Discoloured discharge to river	WADA	Y	Y
28/06/11	Discoloured discharge to river	WADA	N	Y
9/08/11 – 18/08/11	Serious Sludge discharge to river	WADA	Y	Y

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The following documents and photos are ordered, as far as is possible, in the same chronology as the table

03/06/08 - Excerpt from minutes of club monthly meeting on Wednesday 4th June 2008

- D O'Keeffe stated that there had been a pollution incident in the Kiltha river the previous Tuesday night emanating from the pipe from the Castlemartyr waste water treatment plant. Note also reference in following document.

04/08/2008

Events leading up to incident on 040808

On 21st July 2008 the inlet screen at the WWTP tripped causing it to cease operation. The inlet screen has been operating under strain in recent months due to the consistently high level of solids that are flowing into the plant. A fitter from EPS examined it on same day and reported that the screen would need to be removed for complete overhaul off site.

The screen was removed on 30th July and taken away for repair. A manual screen was inserted in its place.

The automatic screen screened the incoming waste and when the screen was fully covered it washed away the screenings into a nearby sump. Once the manual screen was in place this operation had to be done by hand. EPS operatives were calling to site once a day and twice if they felt it was needed to rake the screen.

On the 4th August the screen had been cleared during the day but blocked again by that evening causing the incoming sewage to back up and overflow onto the ground.

As the untreated sewage was filling up the inlet manhole, prior to it overflowing onto the ground, it reached a level where it overflowed the manual screen and some unscreened waste entered the treatment system.

The treatment system is not designed to cope with rags and other large debris that unfortunately are forming a large part of waste arriving at plants countywide for treatment.

Once this was processed through the treatment system it caused the sludge return pumps (that recirculate sludge for more treatment) to block and trip out. This in turn caused a build up of sludge within the final clarifier causing an overflow of sludge into the treated effluent channel and from there discharged back into the river.

In summary due to the nature of the effluent (high in solid content both organic and inorganic) arriving at the plant for treatment on that Monday evening the manual screens blocked up faster than could be anticipated and in turn had a knock on effect causing the unintended discharge of untreated effluent at the inlet chamber and unintended discharge of solids into the treated effluent line and in turn discharged back into the river.

EPS were contacted at 1930hrs and came immediately to the site. The plant was back running successfully by 2200hrs.

Reports were also logged with our environmental department about discharges of sludge from the treatment plant on 3rd June last. This incident was also due to the sludge return pumps blocking due to the high volume of solids entering the plant.

EPS Pumping and Treatment Systems - Incident Report

Location	Castlemartyr WWTP
Date/Period	4 th October 2009
Report Author	Barry O'Toole
Report Date	7 th October 2009
Water/Wastewater	Wastewater
EPS Plant Supervisor	Vincent Browne
EPS Client	Cork County Council
Client Contact Name	Madeleine Healy

Introduction

A report was received by Vincent Browne that a below standard discharge was noticed at the discharge point from the Castlemartyr WWTP into the Kiltaha River on 4th October 2009. The discharge is the correct discharge point for the sewage treatment plant but it was noticed that the quality of the discharge was initially not of good quality but improved within the discharge period as verbally confirmed by the reporter of the incident.

Details

Upon investigation, it was discovered that upon pumping the sewage forward for treatment, that on occasions, some scum was being carried from the surface of the final clarifier into the final effluent. The WWTP suffers from foam accumulation on the clarifier but the insitu baffles usually prevents any carry over of these solids. On this occasion, some of the solids had accumulated near the baffle to a point where the solids were carried over.

Upon further investigation, it was discovered that the scum channel from the clarifier had blocked with ragging, exacerbating the situation. While foam accumulation is an ongoing issue at the works, it has not previously affected the quality of the final effluent as evidenced from historical data, and the loss of the scum removal system (due to the ragging) probably had sufficient effect to cause the situation to worsen and affect the quality of the discharge.

It should be stated that the final effluent quality at the works is and was excellent now, and at the time of the reported discharge. It was the partial loss of surface solids that caused the overall quality of the discharge to deteriorate periodically.

04/10/2009



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----- Forwarded message -----

From: Madeleine Healy <Madeleine.Healy@corkcoco.ie>

Date: Thu, May 20, 2010 at 12:31 PM

Subject: Castlemartyr WWTP

To: burkesat37@gmail.com

Cc: Jack McCarthy <Jack.McCarthy@corkcoco.ie>, Alan Costello <Alan.Costello@corkcoco.ie>

David

Apologies for not coming back to you sooner.

I forgot to mention in our conversation yesterday that the Operators had brought to my attention some weeks ago a problem at the plant arising from a dramatic increase in the volumes of Fats Oils and Grease (FOG) entering the Plant.

I attach an email from Vincent Browne detailing their plan for dealing with the problem and also reporting your earlier complaint after the Bank Holiday weekend.

Until we can source and remove the extra FOG's from the system we will be counteracting it as detailed below.

The problem that arose last Tuesday occurred due to a problem with the dosing pump flow rate used in this procedure. Due to the rainfall on Tuesday and associated increased flow into the plant the dosing flow rate was not adequate. This has now been rectified and is set sufficiently high to hopefully prevent a reoccurrence.

Though you left a voicemail message with Vincent Browne it was not picked up until too late Tuesday night to do anything about it and EPS personnel were on site first thing Wednesday morning to address the problem.

Further adjustments/fine tuning of the treatment process are also being done to further reduce the risk of any sludge carryover. We are also trying to locate the excess FOG and remove it at source.

We appreciate your help in assisting us to prevent pollution incidents such as occurred last Tuesday. Unfortunately the plant is not monitored on a 24hr basis and therefore when such incidents occur we appreciate notification from members of the public so that it can be rectified as soon as possible.

I apologise again for the delay in getting back to you

Madeleine Healy

Madeleine,

I received a complaint from a David Burke from Castlemartyr regarding untreated sewage entering the river on Monday last (3/5/10). Following a visit to the plant an hour after the complaint, the effluent entering the river was clear and the parameters were well within their limits when tested yesterday (4/5/10). Recently, we have had issues with large concentrations of FOGs entering the plant at the inlet screen (as highlighted during the last monthly meeting). This may be due to the recent dry weather. As a result, the sludge blanket in the clarifier has been affected and on occasions, this may cause a section of sludge to rise to the surface and overflow the weir of the

clarifier. This may have been what David Burke witnessed. As this happens rarely and the composite sampler takes a sample every 30 minutes, this may be the reason why it has not shown up in the final effluent sample. To prevent the sludge from rising, EPS have installed a polyelectrolyte dosing pump. This should make the sludge bind together and make it more dense, thus preventing overflow of sludge to the river.

Regards,

Vincent Browne
EPS

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26-27/05/2010

Womanagh Angling & Development Association

wada1996@gmail.com

Madeleine Healy
Floor 5 (The Tower)
County Hall
Cork

Dear Madeleine,

Please find enclosed 2 CDs containing photographs and video footage from my camera portraying discharge from the Cork Co. Council owned WWTP in to the river Kiltha at Castlemartyr. This evidence was gathered by me on dates in 2009 and 2010. Further photographs have been taken by local people in Castlemartyr on different dates which I hope to collect very shortly.

I'm sure you will agree this kind of discharge is unacceptable and may prove a public health risk. As we have worked to improve resident fish stocks in recent years, which seems to have borne fruit, many people now access the river Kiltha for fishing and other leisure activities.

As recently as yesterday evening (26th May 2010) and this morning (27th May 2010) a highly discoloured discharge with a strong detergent-type smell was entering the river from the WWTP pipe.

This continues to be a very lamentable and frankly unacceptable situation. EPS are well capable of quoting values and figures which simply do not portray the severity and affect of these discharges. Hopefully the material on these CDs will impress upon you the stark reality of the pollution and the affect on the river and its wildlife.

In addition we in the fishing club are logging every event of an "abnormal" discharge from the WWTP.

Your assistance in bringing and end to, or at the very least minimising such events would be greatly appreciated.

Kind regards,

David Burke (Hon. Sec.)
Womanagh Angling and Development Association
37 The Willows
Gort an Oir
Castlemartyr
Co. Cork

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08/04/2011



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28/06/2011



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09/08/2011 to 12/08/2011 - See appended pdf file which was submitted on 12/08/2011

13/08/2011 to 17/08/2011 - Photos ordered by Date and Time



13/08/2011 - 13.25



14/08/2011 - 09.08



14/08/2011 - 0910

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15/08/2011 - 09.33



15/08/2011 - 09.33



17/08/2011 - 10.04



17/08/2011 - 20.46

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Summary

It is clear from this document that there has been a litany of pollution incidents of varying severity originating from the waste water treatment plant at Castlemartyr in the last three years.

Given that all the logged incidents were recorded by members of the Womanagh Angling & Development Association, it would be reasonable to assume that there have been numerous other incidents which have not been noticed or, having been noticed, were not reported. It is clear that the WWTP at Castlemartyr is not, in its current configuration, fit for purpose.

The Waste Water Discharge (Authorisation) Regulations 2007 was deemed to be the solution to water quality at its signing by the then Minister John Gormley.

(Quote) *"Water is a precious resource and just is not acceptable that our ground waters are being polluted unnecessarily," so said The Minister for the Environment, Heritage and Local Government, Mr John Gormley, T.D (today 12th October) as he announced he had signed new regulations which provide for the licensing and policing regime of sewage treatment facilities. The new licensing system which will be policed by the Environmental Protection Agency will set strict limits on discharges allowed from these plants into our surface waters such as rivers, canals and lakes, groundwater and coastal waters. The Regulations have been made to implement outstanding aspects of the EU Dangerous Substances and Water Framework Directives.*

The Minister reiterated his commitment to preserving and enhancing environmental standards and the quality of natural water resources in particular. "These new Regulations will form part of an overall strategy to protect the environment and improve the quality of life", the Minister said. "The Regulations, in conjunction with the recently announced provision of €4.7 billion in the National Development Plan for new and upgraded water services infrastructure, are a reflection of the Government's commitment to this aim" he added,

The Environmental Protection Agency, in considering applications for authorisations, will stipulate conditions to ensure compliance with standards applying for various substances and to conform with obligations under applicable EU Directives, including the Water Framework, Dangerous Substances, Birds, Groundwater, Drinking Water, Urban Waste Water Treatment, Habitats and Bathing Water Directives." (Unquote).

Based on the experiences of the Womanagh Angling & Development Association, the Act, its administration, enforcement and spirit is, sadly for the River Kiltha and the greater environment, being circumvented on a regular basis.

Just what does it take to achieve clean water and a clean environment eleven years into the 21st century?