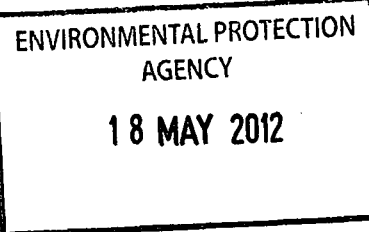




Iascach Intíre Éireann
Inland Fisheries Ireland

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



Our Ref: MK

16th May, 2012

Re: Waste Water Discharge Licence Applications
Ballinode Wastewater Treatment Plant, Co. Monaghan - Register No. D0435-01
Emyvale Wastewater Treatment Plant, Co. Monaghan - Register No. D0346-01
Dromiskin Wastewater Treatment Plant, Co. Louth - Register No. D0264-01

NK/JR
NK/JR
NK/JR

Dear Sir/Madam,

We refer to the above mentioned Waste Water Discharge Licence applications. We note that we do not appear to have received acknowledgements from the EPA of submissions made regarding the above applications. For your information, we enclose copies of these submissions.

We would be grateful if you could inform us, at your convenience, if you have already received these submissions.

Yours faithfully,

Michaela Kirrane

Michaela Kirrane,
Senior Fisheries Environmental Officer



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/3a.1

4th October, 2010

**Re: Dromiskin Wastewater Treatment Plant, Co. Louth
Waste Water Discharge Licence Application
Register No. D0264-01**

Dear Sir/Madam,

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

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 A & B: Relating to Treatment Plant upgrade proposals

Proposed Treatment Plant upgrade (pg 10 of 39); we note in the application that it is proposed to upgrade the plant to 2,100 p.e. Phase 1 and 3,400 p.e. Phase 2. We understand from communications with Louth Co. Co. that a new plant with a design capacity of 1400 p.e., which will operate in parallel with the existing plant was completed this year.

As a result of these changes we suggest that details of current load to the plant and current design capacity of the plant should be updated in the application.

Section F: Existing Environment & Impact of Discharge

The applicant refers to EPA biological monitoring on the River Fane (pg 31 of 39). We note in Table 3 that the Q value at Station 1000 in 1997 is recorded as 4-5, according to the EPA website, this site hasn't been sampled since 1982. We also note that the most recent published data is 2000 in the application (footnote to Table 3). Currently, the most recent monitoring was carried out by the EPA at Station 0900 in 2009.

As the EPA do not carry out water quality monitoring in this section of the river (Bridge at Stephenstown Station 0900 is most downstream station) this highlights the need for the applicant to carry out regular monitoring of the receiving water to assess the impact of the discharge on water quality.

We note the following information has not been provided in the application:

- flow data for the river
- assimilative capacity calculations for the receiving water

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.

Given the lack of detail provided by the applicant in this Section F we would strongly urge that further information is sought from the applicant in relation to the issues we have addressed.

Fisheries value of the receiving water

From a fisheries perspective the receiving water, the River Fane, is valuable natural resource. The river holds stocks of Salmon, Trout, Eels, Lamprey and Stoneloach. In fact, this is the only river on the east coast, which was open for game angling this year, i.e. there are sufficient numbers of Salmon and Sea Trout returning to the river to spawn to allow for recreational fishing to take place.

Given the value of fisheries/aquatic habitat of the River Fane 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 Kiwanne s.c.s.

pp. William Walsh,
Director – Eastern River Basin District

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

5th October, 2010

**Re: Ballinode Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. D0435-01**

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 Ballinode, 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

EPA biological monitoring - the most recent results available on the EPA website for 2007 are as follows:

Station 0130 1.5km d/s Scotstown – Q 4

Station 0300 1st Bridge d/a Ballinode – Q3-4

These sites are due to be monitored again this year, 2010. This information should be included in the application.

Water quality monitoring – EPA monitoring sites are located at Station 0130 1.5km d/s Scotstown and Station 0800 Newmills Br, which is a considerable distance downstream from the wastewater treatment plant.

Monitoring results, upstream and downstream, provided by the applicant to 5 sampling occasions for some parameters and one occasion in the case of some of the nutrients, most notably Ortho P and NH₃-N.

Having carried out a mass balance calculation based on the information provided we noted a potential increase in Ortho-P levels in the receiving water. Sampling frequency should be increased in relation to these nutrients in order to establish a more accurate reflection of water quality status.

We note that the lower limit of detection for B.O.D. analysis is 2mg/l; we would suggest that a lower limit 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.

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.

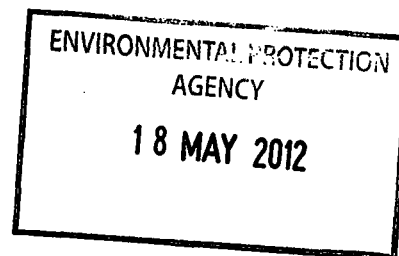
Yours faithfully,

Michael Kivae CEO

PP

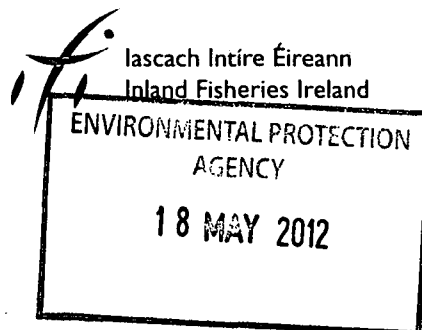
William Walsh,
Director – Eastern River Basin District

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



Our Ref: MK/13c

5^{28th} March, 2012

**Re: Emyvale Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. D0346-01**

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 Emyvale, 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

We note the monitoring results for the treated effluent relate to dates in 2004-2006 and just two dates in 2009. When assessing the impact of the discharge on the receiving environment it would be more valuable to use current results.

Having carried out a mass balance calculation based on the information provided we noted a potential increase in parameters we assessed, namely BOD, Ammonia and Ortho-phosphate. Therefore, we would strongly urge that recent monitoring results are used in the assessment in order to assess the status of current conditions.

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 Mountain Water is a valuable resource. The river holds good stocks of Brown Trout with spawning and nursery habitat throughout. It should also be noted that the river contains notable stocks of crayfish, *Austropotamobius pallipes*, which is an Annex II species.

Given the value of fisheries/aquatic habitat of the Mountain Water 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,

Michaela Kiwone S.F.E.O.

PP.

William Walsh,
Director – Eastern River Basin District

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