

Eve O'Sullivan

Subject: DO297/01 Castletown Bere
Attachments: Planning Ref 19-813.doc

From: Ann Murphy [REDACTED]
Sent: Tuesday 27 April 2021 23:08
To: Wexford Receptionist <REC_WEX@epa.ie>
Subject: DO297/01 Castletown Bere

Hi,
I refer to the above Discharge Licence and wish to advise you that Irish Water have commenced works in Castletown Bere which includes Primary Treatment only and not the Secondary Treatment, as required in the above Licence. I attach my submission to the Planning Application and request that this be considered if an application is received to vary the Licence.
Please advise on the process to vary the Licence and the opportunity for submissions from the public, SFPA, Marine Institute, Licenced Aquaculture Operators, etc, to be considered.

Regards,
Ann Murphy
[REDACTED]

*For inspection purposes only.
Consent of copyright owner required for any other use.*

To Cork County Council

Castletown Bere
29/01/2020

Planning Reference 19/813, Irish Water WWTP at

My husband and I live approx 150m West of the Proposed WWTP. This long awaited WWTP is turning out to be a big disappointment for us in Droum, for Aquaculture in the harbour, for Castletown Bere and for Ireland.

I recommend refusal and wish to object for the following reasons.

1. Proposed Primary Treatment is inadequate treatment and should be Secondary Treatment with UV (EPA Condition 5.6 Technical Amendment A July 2014)
2. The proposed discharge of 280 BOD and 200 SS fail the EPA Discharge Licence DO297/01 limits of 25 BOD and 35 SS issued in 2011 for CT Bere.
3. Primary Treatment for PE > 2,000 has never been provided in Ireland or UK and is unproven. This proposal would not have been approved by Dept of Environment, Community & LG.
4. The Marine Institute, in its 2009 submission to EPA noted that the discharge is not directly into the designated shellfish waters and recommended that the standards for the WWT discharge must be set on the basis of the receiving waters being a designated shellfish water.
5. The proposed estimated current loadings of 1961pe rising to 2,200 pe in 10 yrs, are too low. EPA Licence DG 297 estimated the load at 1,300pe in 2011. The Irish Water provided AER for 2017 submitted to EPA noted the organic load at 1,955pe.
6. The growth in the County Development Plan 2011 to 2022 for CT Bere, 271 new houses, 309 new units is not being provided for.
7. The Urban Wastewater Directive states Secondary Treatment is the basic level of treatment, with more stringent treatment being required in sensitive areas.
8. EPA Technical Amendment A 2014 condition 5.6 requires carrying out assessment of impact of viruses in the Shellfish Waters, which has not been done
9. No Flow and Load surveys have been provided
10. No survey of the existing gravity sewers, proposed to be reused, has been provided. The existing gravity sewer from Brandy Hall PS on the R572 connects with the main town sewer west of Blackrock Terrace, not at the junction with R571 as proposed.
11. The existing outfall from the entire West End (Drom North, Tallon Heights, Council houses, the Rock, Old Bakery, Garda Station) is located at the rear of the new CCC Carpark. This has been missed and will require a further Pumping Station.
12. The proposed Pumping Station at Came Woods cannot gravitate to the Quays PS as proposed and should connect to the rising main to the Plant to avoid septicity
13. Septic sewage from 3 Pumping Stations in series is inevitable and the proposal to provide odour control equipment at the Sludge Holding Tank only is inadequate. All tanks should be in a building fitted with extraction filters.

14. The proposed 90% reduction in E Coli from 1×10^7 (Sewage) to 1×10^6 (Treated effluent, Table 3 Phase 1 Dispersion Modelling Report) exceeds the max 50% possible from Primary Settling tanks. The comparisons in the model from the impact of the existing load of $0.0049 \text{ m}^3/\text{sec}$ at 1×10^7 to proposed load $0.0063 \text{ m}^3/\text{sec}$ at 1×10^6 are skewed by assuming proposed effluent at 10% raw sewage
15. The Modelling & survey in 2018 does not take account of the €25 Mill large breakwaters, dredging and harbour works under construction, which will result in all discharges in the flood tide going into the inner harbour.
16. There is good dispersion $0.2 \text{ m}/\text{sec}$ in the ebb tide to the Harbours Mouth, away from the Shellfish Waters, which could be availed of by including a 6 hr holding tank and lunar clock.
17. The impacts from the 2 No WWTPs in Dinish Island which discharge on the ebbing tide have not been considered
18. Some of the Drogue tracking defy logic. eg Release 09.27 on 31/5/2018 drifted NE till 12.12 in an ebbing tide (High 06.30 to Low 12.30). This is not possible in an ebbing tide with large flows coming out from the inner harbour.
19. The Drogue survey was influenced by light WSW wind 240 deg on 24 May and light East wind 100deg on 31st May when a number ran aground in Droum.
20. The location of the outfall at 2.5m is too shallow, is subject to local eddies and poor dispersion. It should extend outside a line from the new breakwater to Droum Point
21. The modelling shows little or no improvement (8 to 7 E Coli)(Table 23) at the Hornet Buoy which is at the centre of the Shellfish Waters. Shellfish Water in CT Bere can vary from Class A to B. The application notes that shellfish samples were found to be non-compliant with FC
22. No screening has been proposed for the perimeter of the WWTP or PSs

Signed
Ann Murphy

████████████████████

Consent of copyright owner required for any reuse.
For this project in progress only.