

Submission	
Submitter:	Mrs Ger Faughnan
Organisation Name:	HSE Environmental Health
Submission Title:	D0468-02
Submission Reference No.:	S010186
Submission Received:	12 January 2022

Application	
Applicant:	Irish Water
Reg. No.:	D0468-02

Attachments are displayed on the following page(s).



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Date: 14 January 2022

Our reference: 2059

Report to: Environmental Licensing Programme,

> Office of Environmental Sustainability, Environmental Protection Agency,

Johnstown Castle Estate,

Co. Wexford

Type of Consultation: Waste Water Discharge Licence, Castletownshend, Co. Cork

Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1 Applicant:

Dear Sir/Madam

Please find enclosed the HSE Consultation report; for the above proposal.

If you have any queries regarding this report, the initial contact is Ms. Ger Faughnan, Principal Environmental Health Officer who will refer your query to the appropriate person

Yours faithfully,

Ger Faughnan

Principal Environmental Health Officer

Date: 14 January 2022

Our reference: 2059

Report to: Environmental Licensing Programme

Office of Environmental Sustainability, Environmental Protection Agency

Johnstown Castle Estate,

Co. Wexford.

EPA reference: DO468-02

Type of Consultation: Waste Water Discharge Application Review at Castletownshend Waste

Water Treatment Plant, Castletownshend, Co. Cork

Applicant: Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1

Reason for review: The EPA issued a Discharge Licence for the Castletownshend agglomeration in October 2011 (D0468-01). Castletownshend has been identified by the EPA as a Priority Area where untreated waste water is currently being discharged into the environment.

This licence review application is intended to replace the existing Wastewater Discharge Licence for the agglomeration and to seek authorisation to relocate the primary outfall which is in a different location to that authorised in the licence.

The proposed Castletownshend Sewerage Scheme has been designed to cater for the projected load of 531 PE at the 10 year design horizon.

Introduction

The following HSE departments were notified of the consultation request for the licence application on 19 November 2021

- Emergency Planning David O'Sullivan
- Estates Helen Maher/Stephen Murphy
- Assistant National Director for Health Protection National Clinical Director for Health Protection
- CHO Michael Fitzgerald

This report only comments on Environmental Health impacts of the licence application.

General

The Environmental Health Service supports the proposal to provide a sewerage scheme for Castletownshend which will improve water quality in Castle Haven. Upgrade works are planned in order to bring an end to the discharge of untreated wastewater into the environment. The proposal will be beneficial to both the receiving environment and to public health.

The town of Castletownshend is currently served by two main drainage networks, one serving most of the old town and the second serving the Lawn housing estate.

In the first network, serving the old town, wastewater discharges into a stone culvert that runs along the Main Street. This culvert also drains surface water and ground water from the area and is discharged untreated into Castle Haven, which is part of Rosscarbery Bay.

The fold sewage from the Lawn housing estate flows to a private package treatment plant which discharges into an adjacent percolation area.

The proposed Castletownshend WWTP will provide preliminary and primary treatment designed to cater for a hydraulic and biological load for the 10 year predicted population of 531 PE. with the potential to cater for future expansion up to the projected load at the 30 year design horizon of 950 PE.

Castletownshend has been identified by the EPA as a Priority Area where untreated wastewater is currently being discharged into the environment.

In October 2021 Irish Water was granted Planning Permission (Cork County Council Planning Reference: 21/00264) for a new WWTP and associated and ancillary works for the Castletownshend Sewerage Scheme. The works include:

- 1. The Castle pumping station (PS), a proposed underground pumping station and associated infrastructure within the curtilage of the Castle B&B (The Castle, a protected structure), including an underground pump sump, underground stormwater storage tank, vent pipe, kiosks and surge vessel.
- 2. Proposed extension to the existing culvert outfall adjacent to the slipway to below low tide extent
- 3. A proposed rising main and gravity sewer to convey flows from the Castle pump station to the Waste Water Treatment Plant (WWTP) site. The route extends along the lane from Main Street to the entrance of St Barrahane's Church to the fields to the north.
- 4. A proposed WWTP with associated ancillary development works including inlet works, tanks, kiosks, pumping station, entrance, hardstanding and perimeter boundary fencing.
- 5. A proposed outfall pipe to convey treated effluent and storm flows to Castle Haven Bay.
- 6. All associated ancillary site development works above and below ground.

On completion, the proposed development will 'improve water quality in Castlehaven Bay and will bring benefits in terms of health and environmental integrity' and 'will also facilitate the economic and social development of Castletownshend'. (Planning Application Cork County Reference 21/00264)

All commitments to future actions, including mitigation and further testing have been taken as read and all data has been accepted as accurate. No additional investigation/measurements were undertaken in the review of this application.

In respect of this application for a discharge licence review, the areas reviewed were those of concern to Environmental Health which are:

- Any potential contamination of surface water or ground water
- Emissions to air, including noise and odour.

Reason for the licence review

This licence review application replaces the existing Wastewater Discharge Licence (D0468-01) for the Castletownshend agglomeration. Schedule C of the existing licence requires an upgrade of the WWTP and the extension of the primary discharge. Irish Water is requesting authorisation to relocate the primary outfall to a different location to that authorised in the licence.

Site location

The village of Castletownshend is located approximately 86km to the south west of Cork City and approximately 9km to the south east of Skibbereen, in County Cork. The proposed wastewater treatment plant is located within a greenfield site to the north west of the town of Castletownshend and is accessed from an existing private road which runs from the R596 and adjacent to the proposed site.

1. Any potential contamination of surface or ground water

The Environmental Health Service (EHS) has considered any potential risk of contamination of surface or ground water and makes the following comments:

- a) The EHS welcomes the proposed new Castletownshend Sewerage Scheme which, when fully operational, will impact positively on the health of the community and on the local environment, in particular on surface, ground and marine water quality.
- b) Emission Limit Values and monitoring frequencies specified in the EPA licence shall be strictly adhered to in order to ensure the maintenance of surface and groundwater quality and the protection of public health.
- c) It is recommended that an inspection and maintenance programme for the Castle pumping station and for the new treated effluent sea outfall pipe is put in place to ensure the early detection of defects/damage.

2. Emissions to air including noise and odour

- a) The Environmental Health Service recommends that a complaints procedure is implemented and that a member of staff is designated as a point of contact to deal with any complaints or queries received from members of the public in relation to the WWTP facility. The operator should develop a system for recording and responding to complaints from the public regarding fugitive noise and or odour emissions from the WWTP or from any component of the Castletownshend Sewerage Scheme. It is recommended that records of complaints received are included in annual monitoring results reported to the EPA.
- b) It is recommended that an Odour Management Plan is implemented and that regular unannounced odour audits of the plant are undertaken.

Conclusions

The Environmental Health Service makes the following recommendations in respect of this licence application:

- Emission Limit Values and monitoring frequencies specified in the EPA licence shall be strictly adhered to ensure the maintenance of surface and groundwater quality and for the protection of public health
- An inspection and maintenance programme for the Castle pumping station and for the new treated effluent sea outfall pipe is put in place to ensure the early detection and repair of defects/damage.
- A complaints procedure is implemented and that a member of staff is designated as a
 point of contact to deal with any complaints or queries received from members of the public in
 relation to the WWTP facility
- The operator should develop a system for recording and responding to complaints from the public regarding fugitive noise and or odour emissions from the WWTP or from any component of the Castletownshend Sewerage Scheme
- Records of complaints received are included in annual monitoring results reported to the EPA.
- An Odour Management Plan is implemented and that regular unannounced odour audits of the plant are undertaken

Amanda Fitzgeraid

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