



Submission

Submitter:	Pat Moran
Submission Title:	Rec'd by email
Submission Reference No.:	S011148
Submission Received:	02 June 2023

Application

Applicant:	Kilkenny Cheese Limited
Reg. No.:	P1180-01

See below for Submission details.

Attachments are displayed on the following page(s).

From: Pat Moran <[REDACTED]>
Sent: Friday 2 June 2023 19:57
To: Licensing Staff <licensing@epa.ie>
Subject: Licence Application P1180-01 Kilkenny Cheese

For the attention of EPA Licensing and Enforcement Departments

Dear Sir or Madam

I would like to put forward this e mail as a submission on the License application (P1180-01) and a complaint as regards the discharge pipe it is proposing to connect into License D0022-01.

Please find the attached below.

Regards

Pat Moran
Oyster Farmer and Key Stakeholder

Pat Moran



02/06/23

Re: – Licence Application P1180-01 Kilkenny Cheese

Dear Sir/ Madam

I would like to put forward this letter as a submission on the Licence application and a complaint as regards the discharge pipe it is proposing to connect into Licence D0022-01.

Is it possible for the EPA to grant a connection to a discharge pipe that has problems, since at least Sept 22, which Waterford City and County Council and Irish Water did not think it important enough to address, a total disregard and respect for the EPA and a EPA Licence

A treatment plant operating under **“Shock Load”** could not be compliant with its discharge Licence.

Is the **“New Normal”** (see my e mail with photos sent to EPA Licencing department sent 24/03/23) in the Waterford estuary a direct result of the discharge pipe that Licence P1180-01 Kilkenny Cheese proposes to connect into and discharge from? The EPA Site visit report (your reference – SV23797 issue and dated 11/11/22) clearly shows problems with two Licences discharging from this outfall – Licence D0022-01 and Licence P0963-02. Glanbia (now known as Tirlan) having them joined has created two problems, to add Licence P1180-01 to this outfall would make it impossible to monitor and control and could affect the expansion of Waterford City. Future problems would be three Licence problems when it is yet to be seen how two out of control Licences that discharge from one outfall will be solved. Having Licence P1180-01 with its Irish Water emission limits to Sewer is in essence discharges to the estuary combined with two other non-functioning Licences. The discharges would be detrimental to the estuary. The discharge pipe is well up the estuary and in a confined space which would mean the plume would cover the entire space of the ford on the flood tide. The estuary is showing signs of being over its assimilative capacity at present due to the outfall from D0022-01

The precautionary principal should be adopted for this Licence application to join the other two Licences in the sewage discharge pipe until at least the existing problems have been addressed and there is an answer to the **“New Normal”** in Waterford estuary as regards its cause and consequences for the Water Quality and the potential effects on the Environment, SAC and the Shellfish Designated Waters.

- 1) Shellfish Dieback and lack of Shellfish Settlement see my letter attached (dated 18/01/23) on the EPA Water Quality in Ireland 2016 – 2021. What now needs to be done within Licensing to avoid disaster in the future?
- 2) Has the capital upgrade works for the Glanbia connection been carried out?
(See page attached)
- 3) Technical Amendment B ref Licence D0022-01 – why was there no assessment carried out with the involvement of the Sea Fisheries Protection authority, Marine Institute and Bord Iascaigh Mhara and I would say Inland Fisheries Ireland should be involved as well as an assessment that differentiates between Chlorinated water which would be classed as “Good” “Excellent” for beach reports and normal water if there is such a thing in the Waterford estuary now?

Ireland a society and economy built on the destruction of the environment, streams, rivers, estuaries and the sea is not sustainable.

Yours sincerely

Pat Moran

Pat Moran

[REDACTED]

[REDACTED]

[REDACTED]

18/01/23

Ref – EPA Conclusion quote ***“This continued pressure is now having impacts on the biology of both the estuarine and coastal waters particularly in the open water (e.g. phytoplankton and fish) and invertebrates that live on the bottom (benthos).”***

Dear Sir/ Madam

Has Ireland Crossed a Line?

Ireland 2023 a society on the smallest amount of land destroying the most amount of water on the planet.

Phytoplankton – The basis of all life in the sea cannot be seen and treated as other species have been treated in Ireland and seen as of no importance, **surplus to requirements** for Irish society and economy and made to become extinct under the illusion of Protection (Green Washing). (See EPA’s conclusion below)

Business and livelihoods destroyed by pollution in “Green Ireland” now exposed. (Green Washing). Aquaculture business in Waterford Estuary- the first business to be destroyed by pollution in Ireland, Estuary Fishermen are also victims.

The EPA in its Water Quality in Ireland 2016 – 2021 Report published late 2022.

Para 4.9- Conclusion

“Transitional and coastal waters have seen a significant decline in status in this assessment, which is particularly worrying. The increase in nutrient inputs to the marine environment are likely a strong driver of these declines. Most of these increases have been seen in the south and southeast of the country and many of the declines in status are in these areas well. This continued pressure is now having impacts on the biology of both the estuarine and coastal waters particularly in the open water (e.g., phytoplankton and fish) and in invertebrates that live on the bottom (benthos). Further analysis is ongoing to better understand what has caused these declines, but the preliminary evidence suggests that the primary factor is excessive nutrients.”

“The Environment is telling a story of neglect, failure and illegality on a massive scale within the Planning and Licencing system.” At the moment “Having Decline” in 30 km² of the Waterford Estuary effects species 9000 km² inland along with effects on

species many thousands of miles along the coast of Ireland and out to sea as the decline continues the area out to sea increases.

EPA

“The trends indicate that overall Water Quality is declining and getting worse”.

This behaviour within Planning and Licensing of seeing Species and their environment as (**surplus to requirements**) both in Ireland and its coastal waters along with having no accountability/responsibility or regard for the Law has to stop. For that to happen a duty of candour would be required (enforced) across the statutory agencies and departments which has not been there. The crisis now for Planning and Licensing was inevitable along with being warned about. Changes needed to happen since at least 2019 (see letter attached). The result being the time for gradual change has expired and now immediate action is needed, water quality is declining and getting worse, how much time has Phytoplankton and Plankton before a major collapse of the food chain? A monumental crisis/disaster for Ireland and beyond.

Since 2016 the receiving water environment of Waterford Estuary, South East and South coast is no longer able to cope with the volume of pollution being discharged. Transitional Waters in Less than Good status include the estuarine reaches of the **Barrow**, **Suir** and **Nore** rivers (EPA). An area with EU designations, (now worthless designations) Natura Site, SAC, Shellfish Designated Waters. On account of Ireland's unique geographic position Ireland is capable of doing immense and untold damage (irreversible damage?) to the sea and its species. All unseen by Europe and beyond on account of Green Washing by Ireland.

Could the EPA be understating the size and scale of the problem at present for Ireland? Water Classification does not include – Norovirus – Superbugs – Covid19 or Chlorine produced oxidant's (CPO's) and whatever else is in the mix only E-Coli which Ireland's addiction to Chlorine has solved along with disguising bathing waters resulting in bad becoming moderate-good?

As all will be aware I made a formal complaint to the EU Commission 2021 about Ireland's behaviour in its lack of protection and compliance with the Law in Planning and Licensing. I believe now my complaint was justified along with my letter to Government and Departments and statutory bodies in Ireland not acted upon. I hope the EU Commission and EU Parliament will be sufficiently alarmed about the consequences for the sea, and also alarmed by Ireland's disregard for EU Directives, Protections and the Law as regards the Environment while receiving funds from Europe for Europe to take action.

Please find below examples of EPA Licences and also Planning that give the impression of protection of Water Quality and the Environment

EPA Licence P0606- 03 – 04 and Planning for Licence.

Dumping at Sea Permit – EPA S0012 – 04 plus attempted attachment (2022) to the permit of Planning Waterford County Council File 20/217

Treatment Plants – why would they be different anywhere else in Ireland by the rivers and along the coast?

EPA – D0170-01 – Dunmore East + Chlorination of stream (bathing)

EPA – D0022-01 – Waterford City

EPA – D0245-02 Duncannon – Arthurstown – Ballyhack.

“The best illusions are the ones written down in plain view and carried out in plain view.”

Yours sincerely

Pat Moran

Extinct Oyster Farmer and Fisherman

Table 9. WWTP to Sewer - current and requested limits

Parameter	Current limits		Applied in RD	
Maximum flow in any one day	4400m ³	-	4400m ³ (7000m³ Note1)	-
Maximum flow in any hour	183m ³	-	183m ³ (400 m³ Note1)	-
Maximum flow in any hour (Annual Average)	-	-	(292m³ Note 1)	-
pH	6-9 pH Units		6-10 pH Units	
Temperature	30°C		35 °C	
	Daily Conc.	Daily Load	Daily Conc.	Daily Load
BOD	2,500 mg/l	3,700 kg/day	2,500 mg/l	3,700 kg/day (4710 kg/day Note 1)
COD	3,750 mg/l	5,500 kg/day	3,750 mg/l	5,500 kg/day (7000 kg/day Note 1)
Suspended solids	1,000 mg/l	-	700 mg/l	-
Total Nitrogen	-	-	(50mg/l Note 1)	(250 kg/day Note 1)
Ammonia (as N)	50 mg/l	160 kg/day	50 mg/l	160 kg/day (- Note 2)
Total Phosphorus (as P)	65 mg/l	200 kg/day	65 mg/l	200 kg/day
Oils, Fats, Greases	100 mg/l	150 kg/day	100 mg/l (120 mg/l Note 1)	150 kg/day (350 kg/day Note 1)

Note 1: ELVs in bold font within brackets shall apply following written confirmation from Irish Water of the completion of the required capital upgrade works at the Waterford City WWTP as Connection Agreement "CUST14006 Major Wastewater Connection Agreement" between Irish Water and Glanbia Ireland DAC.

Note 2: There will be no daily mean loading for Ammonia once the capital upgrade works at the Waterford City WWTP is completed.

Irish Water have assessed the IE licence application P0963-02 and are satisfied to consent to the proposed discharge to sewer subject to standard consent conditions.

The majority of the new emission limit values are dependent on the completion of the required capital upgrade works as set out in connect agreement "CUST14006 Major Wastewater Connection Agreement" between Irish Water and Glanbia Ireland DAC.

The treated effluent from the on-site WWTP will be monitored continuously for the following parameters: flow, TOC, pH, and temperature. In addition effluent quality is and will continue to be monitored daily for Chemical Oxygen Demand, Oils, Fats, & Greases. Fortnightly for Suspended Solids, Ammonia, Total Nitrogen and Orthophosphate and monthly for BOD, Total Phosphorus and Total Oxidised Nitrogen in accordance with Irish Water's Consent notification.

Mitigating measures to reduce/minimise/prevent emissions are as follows:

- Recovery and purification (RO) of process water for reuse in process and cleaning.
- Metering of water use.
- Development of KPIs for minimising water usage.
- Use of balancing tanks to balance out effluent spikes from the plant, for example during CIP.
- Use of acid and alkali to neutralise pH of wastewater.