Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

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Mr. Mark Johnston
Monaghan County Council
County Offices
The Glen
Monaghan

20 April 2009 D0206-01

re: Notice in accordance with Regulation 18(3)(b) of the Waste Water Discharge (Authorisation) Regulations 2007

Dear Mr. Johnston

I am to refer to the above referenced application for a waste water discharge licence relating to the agglomeration covering Clones and its environs. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Regulation 16 of the Waste Water Discharge (Authorisation) Regulations 2007.

You are therefore requested, in accordance with Regulation 18(3)(b) of the regulations, to take the steps to supply the information detailed below:

REGULATION 16 COMPLIANCE REQUIREMENTS

1. Update the non-technical summary to reflect the information provided in response to this notice.

2. Clarify if the reed-beds are used for the treatment of settled sewage, there are conflicting statements in the non-technical summary and elsewhere in the application, including drawing No. 02 and No. 09. If there is a discharge to the reed-beds provide an assessment of the impact of such discharge on ground/groundwater. If reed-beds are redundant clarify the decommissioning completed to date or proposed.

3. Clarify/correct the statement in the non technical summary that 'no combined sewer overflows were located'.

4. Please provide the name of the agglomeration to which the Waste Water Discharge Licence Application relates. Please also amend, if necessary, the

name of the agglomeration on the Waste Water Licensing Web based data tool.

5. Provide a copy of the preliminary report submitted to the Department of Environment, Heritage and Local Government. Provide any details of feedback from the Department.

6. Clarify the conflicting statements on page 34 and 35 of the application in relation to compliance with the Urban Waste Water Treatment Regulations.

7. Clarify the source of the dichloromethane figure presented in Table D.1(i)(c), assess compliance with the Water Quality (Dangerous Substances) Regulations 2001 and identify measures to address the elevated concentration identified. Please amend as necessary the statement on page 55 in relation to the Water Quality (Dangerous Substances) Regulations 2001.

8. Provide details of the frequency of overflow at each of the storm water overflows. Provide summary details of the draft Hydraulic Modelling Report referred to in the application and provide details of the conclusions and remedial works to be completed based on the results of the report.

9. Assess the design criteria of the storm water overflows. Demonstrate (providing available evidence) whether all storm water overflows meet the design criteria established in *'Procedures and Criteria for Storm Water Overflows'*, published by the Dept. of the Environment, 1995. Identify any SWOs that may be impacting on surface water quality. Where a storm water overflow does not comply with these guidelines, give details of the plans, for improvement.

10. Monitoring results for water samples taken downstream of the primary discharge indicate elevated concentrations for a number of parameters including total P, ortho-phosphorus, BOD and dichloromethane, provide an assessment of the impact caused by the discharges from the agglomeration and identify remedial measures including timeframes for their implementation.

11. Clarify the number of pumping stations within the agglomeration, the non technical summary refers to four, drawing no. 01 identifies eight, and nine are identified on page 29 (includes the pumping station at the WWTP). Provide details of the frequency of any overflows at the pumping stations identified.

12. Clarify the various figures provided for discharge from the WWTP throughout the application and identify the appropriate discharge figures and revise the assimilative capacity calculations as necessary, these figures include the following: DWF of 693m^3/day, normal flow 1500m^3/day, maximum/day flow of 2000m^3/day, pump at WWTP has capacity of 2419m^3/day (without the assist pump), DWF in assimilative capacity calculations of 1000m^3/day, DWF in Clones Catchment report of 1150m^3/day, and influent flows listed in

Attachment D greater than 2000m^3/day (four of the seven days results presented exceed 2000m^3).

13. Clarify conflicting statements on page 28 in relation to adequacy of storm water storage capacity.

14. Clarify the source of the figures used in the Formula A calculations presented in the application, provide an assessment and recommendation based on the figures calculated.

15. For the assimilative capacity calculations provided clarify the location on the receiving water where the capacity is calculated and clarify the source of the background figures. In the assimilative capacity calculation for BOD 2mg/l is used in the calculations yet 2.4mg/l is identified as the background concentration in the text, clarify and revise as necessary. Provide calculations for suspended solids. Provide justification for using a background ortho-phosphorus figure of 0.03 when the actual background is 0.18mg/l. Clarify the background figures used for ammonia.

16. Identify measures to address the limited BOD and ortho-phosphorus capacity in the receiving waters, include timeframes for completion of any identified measures. Identify measures for achievement of 'good surface water status' in the receiving waters.

17. In relation to the proposed waste water treatment plant provide details in relation to timeframes for planning approval, construction and commissioning.

18. Provide details of the proposed outfall to the River Finn, including discharge point, assimilative capacity calculations based on the proposed discharge point, identify appropriate emission limit values and a timeframe for installation of the new outfall.

19. Amend page 56 as appropriate to reflect this application and delete reference to Ballybay.

20. Identify the abstraction of water for industrial use, noted in the Clones Catchment Report.

21. Clarify the hydrometric data for Anglore/Anlore presented as 0.19m^3/sec in the assimilative capacity calculations and as 0.10m^3/sec in the Clones Catchment Report. Amend the assimilative capacity calculations as necessary.

22. Provide details, including summary water quality results, of water quality monitoring undertaken by Monaghan County Council in the receiving waters.

Your reply to this notice should include a revised non-technical summary which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Please supply all the information requested above, in accordance with Regulation 18, in the form of a one original plus one copy **within 6 weeks** of the date of this notice. In addition please submit one copy of the requested information in electronic searchable PDF format on a CD-ROM to the Agency. Please note that all maps/drawings should not exceed A3 in size.

Please note that the application's register number is D0206-01. Please direct all correspondence in relation to this matter to *Administration, Environmental Licensing Programme, Office of Climate, Licensing & Resource Use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

Patrick Byrne
Inspector
Office of Climate, Licensing & Resource Use