

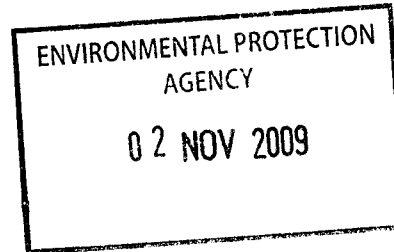


Eastern Regional Fisheries Board
Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage

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Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
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Our Ref: MK/13a

30th October, 2009

**Re: Glaslough Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Licence Application
Register No. 0347-01**

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 Glaslough, Co. Monaghan.

Having examined the application documents, on the EPA website, we have the following comments to make:

C. Infrastructure & Operation

The waste water treatment works is described as comprising of a gravity sewer network, a pumping station and associated rising main and an Integrated Constructed Wetland (ICW). The applicant states that "No pre-treatment is carried out".

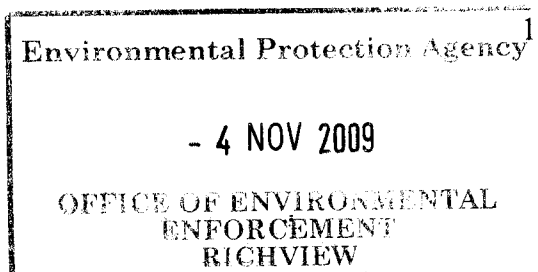
When the proposed treatment works (Planning Ref. 05/8008) was approved by Monaghan County Council in August, 2005 the proposal included an underground primary settlement tank. We note that this was not included in the construction of the treatment works.

The applicant states that the influent is pumped directly to two sludge ponds, which are used alternatively to allow for desludging. There are no details in the application in relation to the management and disposal of sludge from these ponds.

E. Monitoring

The applicant states that the estimated discharge from the treatment works is 36,500m³/annum, which is 100m³/day. Given that the PE of Glaslough village is 700 (pg 16) the potential wastewater flow to the plant is 126m³/day (based on per capita wastewater flow 180l/day).

While the applicant states that flows are measured this data does not appear to have been included in the application. We believe that details of flows to, through and from the treatment works should be detailed in order to establish any losses from the system through evaporation, etc.



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We note that water sampling of the primary discharge and monitoring of the upstream and downstream locations are undertaken every 6 weeks. Biological sampling does not appear to be included.

Given that this is a pilot treatment plant we believe that frequency of monitoring of the influent, effluent and river should be increased and that the monitoring programme should include annual biological monitoring of the receiving water and regular analysis of ground water.

F. Existing Environment & Impact of the Discharge

The Mountain Water has been described as a tributary of the Monaghan Blackwater. The Mountain Water flows directly into the Ulster Blackwater at Mullyjordan, Co. Monaghan, which is downstream of Annaghroe Bridge, while the Monaghan Blackwater flows into the Ulster Blackwater at Lemnagore Wood in Co. Tyrone.

The applicant states that a Q value of 3-4 was recorded upstream of the discharge point (Nr of Glaslough Br – Station No 0.650) in 2004 and that a Q3 value was recorded at this site in 2001 & 1998. The applicant includes this information in Table 2 where the results for 2001 & 1998 are listed as Q4 in both cases.

These results do not tally with the information provided on the EPA website (<http://www.epa.ie/qvalue>) where a Q3 was recorded at this site in 1998, 2001 and 2004. This site was not sampled in 2007.

The Draft Neagh Bann River Basin Management Plan reports that the Overall Status of the Mountain Water River (IE_NB_03_416) as Poor, which we understand has since been upgraded to Good Status. The Risk Status of the river is recorded as At Risk, with Waste Water Treatment Plants being one of the Point Risk Sources. The overall objective for the river is to restore to good status by 2015. We note that this information has not been included in the application.

We note that in the assimilative capacity calculations that the applicant uses the EQS from the EC (Quality of Salmonid Waters) Regulations, 1988. 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. We would also suggest that the applicant would include Ammonia values in the calculations, as the Surface Water Regulations include an EQS for Ammonia.

We note that while the applicant states that groundwater results are detailed in Attachment F1 these results do not appear to be contained in the attachment.

G. Programmes of Improvements

We note that the applicant states that there is an average 98.9% reduction of P concentration between the inlet and the outlet of the plant.

Given that this is a pilot treatment plant we would suggest that more detailed information is provided to support this statement, including groundwater monitoring results.

Assuming that all of the 98.8% of Phosphorus (P) is contained within the ICW, we suggest that the long-term management of Phosphorus should be addressed.

Our concerns are in relation to the long term Phosphorus build-up within the ICW and the potential release of same to the aquatic habitat.

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. The river also contains notable stocks of crayfish.

Given the value of fisheries/aquatic habitat of the Mountain Water and the fact that its WFD status is now described as Good it is vital that appropriate discharge limits and detailed monitoring is included in the licence for the pilot treatment plant at Glaslough to ensure that there is, at the very least, no deterioration of existing conditions.

We trust you will take our observations on board when assessing this application.

Yours faithfully,

Michael Kiwan S.F.E.O.

pp.

Pat Doherty,
Chief Executive Officer

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