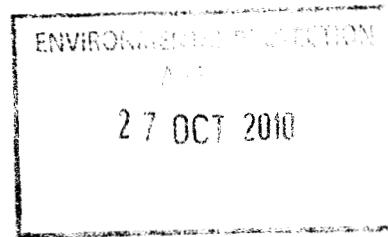


Iascach Intíre Éireann
Inland Fisheries Ireland



Administration,
Environmental Licensing Programme,
Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Our Ref: MK/3.d

26th October, 2010

**Re: Oram Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Certificate Application
Register No. A0033-01**

Dear Sir/Madam,

ERFB now known as Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *the principal function of IFI is the protection, management and conservation of the inland fisheries resource.*

We refer to the application made by Monaghan County Council for a waste water discharge certificate in respect of the waste water treatment plant at Oram, Co. Monaghan.

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

D. Discharges to the aquatic environment

The applicant has provided emission characteristics of the discharge in Table D.1 (i)(b). It is noted that the max daily average concentration of orthophosphate in the effluent is particularly high. As there is no effort to simulate flows in the receiving watercourse, it is very difficult to accurately predict the potential impact of the discharge on the receiving watercourse. However, as the receiving water body drains such a small catchment, the impact would most likely be significant in certain conditions. Therefore, we feel that this information should be reexamined and provision made for increased phosphorous removal if necessary.

F. Existing Environment & Impact of the Discharge

The applicant should provide information regarding the flows, physico-chemical and biological data for the Oram stream. This information is essential in order to facilitate an informed assessment of the certificate application. An assessment of the assimilative capacity of the river (receiving water) should be undertaken based on actual physico-chemical data recorded at the site. Although we note that water quality data has been provided in Attachment E4, we feel that a once of sampling occasion does not suffice to give an accurate reflection of the quality of the water body in question over time. It is necessary for the applicant to prove that adequate assimilative capacity exists in the receiving watercourse, in accordance with the EPA Guidance Notes for Waste Water Discharge Licensing and Certificate of Authorisation, to prevent a deleterious impact on fish populations and fish habitat as a result of this effluent discharge.

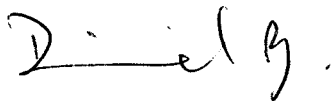
We note that the lower limit of detection for B.O.D. analysis is 2mg/l; we would suggest that a limit lower than 2mg/l should be sought given the standards set in the EC Environmental Objectives (Surface Waters) Regulations, 2009.

From a fisheries perspective, the Oram WWTP ultimately discharges into the Fane catchment which is a very valuable resource. The nearby Muckno Mill Lough and Lough Muckno are productive and popular fisheries. The River Fane itself holds good stocks of Brown Trout, Salmon and Sea Trout. In fact, this is the only river on the east coast, which is open for angling, i.e. there are sufficient numbers of Salmon and Sea Trout returning to the river to allow for recreational fishing.

The fundamental objective of the Water Framework Directive aims at maintaining "high status" of waters where it exists, preventing any deterioration in the existing status of waters and achieving at least "good status" in relation to all waters by 2015. Any certification of the Oram WWTP must be consistent with the requirements of fisheries and other relevant legislation.

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

Yours faithfully,



²¹ William Walsh
Director – Eastern River Basin District