

Sub No 1

A0032-01



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/12.e

28th October, 2010

**Re: Knockatallon Wastewater Treatment Plant, Co. Monaghan
Waste Water Discharge Certificate Application
Register No. A0032-01**

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 Knockatallon, Co. Monaghan.

Having examined the application documents, 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. However, it is also noted that the figure provided for total phosphorus is less than this. In normal circumstances, the concentration of orthophosphate in a water should be a subset of the concentration of total phosphorus in the same water. Therefore, we feel that the figures provided in this table and ultimately the rest of the document should be reexamined and revised, or provision made for increased phosphorus removal if necessary.

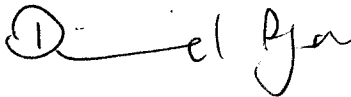
F. Existing Environment & Impact of the Discharge

Although there is no point discharge to a receiving surface waterbody from the WWTP in question, it discharges to ground relatively close to the main channel of the Monaghan Blackwater. Depending on local soil characteristics and the presence of drainage channels in the vicinity, the discharge may have the potential to impact the local watercourse as well as local groundwater. For this reason it may be pertinent to monitor surface water in the vicinity of the discharge, to ensure no deterioration in quality.

From a fisheries perspective the receiving water, the Monaghan Blackwater River, is a valuable natural resource. The river holds stocks of Brown Trout, Eels, Lamprey, Gudgeon, Stoneloach, Minnow and 3-spined stickleback.

The fundamental objective of the Water Framework Directive aims at maintaining "high status" of (all) 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 Knockatallon 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,



William Walsh
Director – Eastern River Basin District

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