Comhairle Contae Chorcaí Cork County Council

Halla an Chontae, Corcaigh, Éire.

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ENVIRONMENTAL PROTECTION

AGENCY

0 9 MAR 2011



Administration,

Environmental Licensing Programme,

Office of Climate, Licensing & Resource Use,

Environmental Protection Agency,

Headquarters,

PO Box 3000,

Johnstown Castle Estate,

County Wexford.

March 4th 2011

The Environmental Protection Agency 10 MAR 2011 CORK A0359-01

Re: Notice in accordance with Regulation 25(c)(ii) of the Waste Water Discharge

(Authorisation) Regulations 2007.

Dear Ms English

With reference to your letter of the 14 of December 2010, please find the following attached:

1 Original plus 1 copy of the Ballinagree Agglomeration (Register No. A0359-01) Regulation 25(c)(ii) Further Information Response.

1 CDROM with the Further Information Response in PDF Format.

Yours Sincerely

Noel O'Keeffe

County Engineer and Director of Water Services

Floor 10 Co Hall

Ballinagree Regulation 25 Further Information Response

Question 1

Assess the likelihood of significant effect of the waste water discharges from the above agglomerations on the relevant European sites by referring to Circular L8/08 "Water Services Investment and Rural Water Programmes – Protection of Natural Heritage and National Monuments" issued by the Department of Heritage and Local Government. In particular, the flow diagram in Appendix 1 should be completed and the results of each section recorded. Provide details of the results of this assessment within one month of the date of this notice.

If significant effects are likely then and appropriate assessment must be carried out and a report of this assessment forwarded to the Agency within one month of the date of this notice.

You are advised to provide the requested information in accordance with the "Note on Appropriate Assessments for the purposes of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. 684 of 2007)" which is available at www.epa/downloads/forms/lic/wwda/.



Wastewater Discharge Licence Certificate of Authorisation Application: A0359-01 Ballinagree

Circular L8/08 2 September 2008 Water Services Investment and Rural Water Programmes – Protection of Natural Heritage and National Monuments

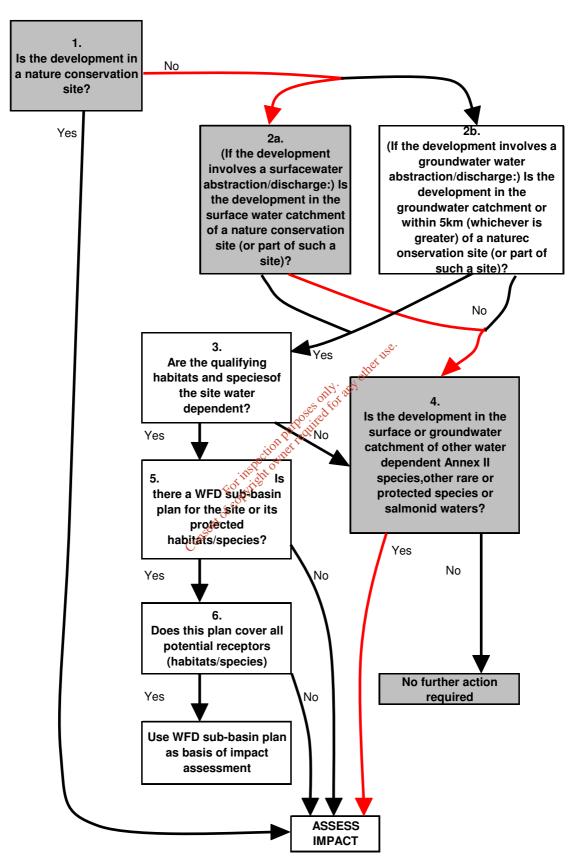
APPENDIX 1

Water Services Schemes - Natural Heritage Checklist for Local Authorities

What projects must be screened?

For new projects and significant changes to any existing operations, if the answer is 'yes' to any of the following, the project (i.e. construction, operation and maintenance) must be screened for its impacts:	
•	
1. Is the development in or on the boundary of a nature conservation site NHA/SAC/SPA?	No
2. Will nationally protected species be directly impacted? Wildlife Acts (1976 and 2000), Flora Protection order (S.I. 94 of 1999)?	No
3. Is the development a surface water discharge of abstraction in the surface water catchment, or immediately downstream of a nature conservation site with water dependant qualifying habitats/ species?	No
4. Is the development a groundwater discharge or abstraction in the ground water catchment or within 5 km of a nature conservation site with water-dependant qualifying habitats/species2?	No
5. Is the development in the surface water or groundwater catchment of salmonid waters?	Yes
6. Is the treatment plant in an active or former floodplain or flood zone of a river, lake, etc?	No
7. Is the development a surface discharge or abstraction to or from marine waters and within 3km of a marine nature conservation site?	No
8. Will the project in combination with other projects (existing and proposed) or changes to such projects affect the hydrology or water levels of sites of nature conservation interest or the habitats of protected species?	No

Flow Diagram with Questions relating to the Agglomeration of Ballinagree Shaded Red



Conclusion: An appropriate assessment is required for Ballinagree

Habitats Directive Assessment (Screening Report) in respect of Application by Cork County Council to the EPA for Wastewater Discharge License for Ballinagree Agglomeration.

March 2011

1 Introduction

- **1.1** The village of Ballinagree is located approximately 8km north east of Macroom. The WWTP was built in 2009 as part of a housing development with a long term view of connecting the existing Village premises to it also.
- **1.2** This document brings together all of the information necessary to make determination as to whether there are likely to be significant impacts arising from the discharge from the WWTP at Ballinagree on the Salmonoid River Lee.

Based on the preliminary flow chart already carried out, the need for an assessment is solely to assess whether the Rylane discharge has an impact on the salmonoid waters of the Lee. The WWTP discharges into the Laney River which is in the Lower Lee Catchment Area.

2 Appropriate Assessment Screening Matrix

2.1 Description of project									
Location	Ballinagree WWTP. See Location map – part A original application								
Description of the key components of the project	Ballinagree WWTP was constructed in 2009. It is designed for a population equivalent of 360 but currently caters for a population of approximately 40.								
Distance from designated sites in potential impact zone	10km from Salmonoid river (River Lee),								

2.2 Description of the Natura 2000 sites within the potential impact zone ¹							
Name	None within impact zone.						
Site Code	N/A						

4

¹ Natura 2000 sites within the potential impact zone of the proposed development have been identified in accordance with guidance provided in the NPWS circular L8/08.

2.3 Assessment Criteria

Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Salmonoid River.

Discharge from Ballinagree WWTP

Treated effluent is discharged into the Laney river which flows into the Sullane river approx. 1km east of Macroom just upstream of the Sullane/Lee confluence.

Other Discharges in the vicinity:

No WWTP's upstream of Ballinagree on the Lee catchment. Macroom WWTP and Coolcower WWTP and septic tank are downstream of Ballinagree.

Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Salmonoid river taking into account the following:

Discharges could give rise to elevated nutrients entering the River Lee. Increased nutrients could have a negative impact on the fish life in the river.

- Size and scale
- Land-take
- Distance from the Natura 2000 site or key features of the site:
- Resource requirements (water abstraction etc.)
- Emissions (disposal to land, water or air)
- Excavation
 Requirements
- Transportation
 Requirements
- Duration of construction, operation, decommissioning
- o Other.

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Describe any likely changes to the site arising as a result of:

- Reduction in habitat area
- Disturbance to key species
- Habitat or species fragmentation
- Reduction in species density
- Changes in key indicators of conservation value (water quality etc)

Climate Change

Reduction in habitat area:

N/A

Disturbance to key species:

Increased nutrients in the Laney river could give rise to elevated nutrients entering the Sullane river and in turn the Lee. However there is no evidence to support this.

Habitat or species fragmentation:

No species fragmentation is evident in the Lee.

Reduction in species density:

No evidence to suggest negative impact on salmonoid waters

Changes in key indicators of conservation value eg water quality:

The South Western River Basin District has carried out a Water Management Unit Report (See Appendix 1) on the Upper Lee Catchment. The Laney River is in this catchment. The upper reaches of the river have been classified as having good water quality while the lower reaches are classified as having high water quality. There is no evidence to suggest the Laney river is in any danger of pollution from the discharge from the WWTP.

The EPA water monitoring sites on the Laney river downstream of the discharge point show a consistent Q value of 4-5 thus indicating that the discharge is not having a negative impact on water quality.

As part of the Application process Cork County Council carried out limited sampling of water immediately downstream of the discharge point (depending on safe access)

There is no evidence of deterioration of water quality associated with these results.

Describe from the above those elements of the project of plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.

No significant impacts are predicted.

3. Finding of No Significant Effects Report Matrix

3.1 Project Description							
Name of project or plan	Ballinagree WWTP discharge						
Name of salmonoid River	River Lee (WWTP discharges into laney river which is a tributary of Lee via the Sullane river)						
Description of the project or plan	The WWTP treats waste from the Ballinagree agglomeration and discharges it to the Laney River.						
Is the project or plan directly connected with or necessary to the management of the site (provide details)?	No						

3.2 The assessment of significance of effects										
Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 Site.	If the discharge from Sallinagree WWTP is high in nutrients, and in combination with other discharges of poor quality it could possibly have a negative effect on the aquatic life in the Lee.									
Explain why these effects are not considered significant.	The Lee confluence is 10km downstream of the discharge location. The discharge from the WWTP is negligible and is not having an impact on the water quality of the Laney river.									

Data collected to carry out the assessment											
Who carried out the assessment	Sources of data	Level of assessment completed	Where can the full results of the assessment be accessed and viewed								
Madeleine Healy, Cork County Council	Cork Co Council EPA water quality monitoring data	Desktop review of cited data.	This report.								

Question 2 Provide details regarding the upgrade of the plant. Your response should include

- (a) Clarification whether the new plant is operational. Where the new plant is not operational provide a timeframe within which the waste water treatment plant will be fully operational.
- (b) Where the new upgrade plant is not operational provide a description of the current treatment process.

The new waste water treatment plant is not fully operational yet. This treatment plan was built to serve development in Ballinagree. As the development associated with this plant remains incomplete and has a small occupancy rate, there is insufficient load to allow the WWTP be fully commissioned. No further development is expected in Ballinagree.

There are no existing WWTPs or septic tanks in Ballinagree. Currently all of the effluent is treated by the new WWTP. Here the effluent is treated in the aeration compartment of the CAS unit, where the air blowers are constantly running. The waste water then gravitates to the settlement chamber of the CAS unit. These 2 processes are the only functional ones of those described in Section C of the original application. Even these cannot be considered to be operating efficiently, given the insufficient load on the WWTP.

Question 3 Confirm the design capacity of the old and new waste water treatment plants and the current population equivalent (p.e.) being treated at the plant. Please confirm that the current p.e. includes the maximum average weekly loading for the agglomeration having taken account of local festivals, peak holiday seasons etc.

The design capacity of the new WWTP is 360 PE. The proposed loading to be treated at the WWTP is 248 PE. The current loading treated at the WWTP is 40 PE.

These proposed loading has been calculated on the basis of full occupancy of all dwellings in the agglomeration. An additional allowance of 10% has also been included on top of the calculated figure. Therefore this is a maximum load figure. See Section B.8 of the Original application. However it will be some time before this figure is reached, due to the collapse of development in Ballinagree.

Question 4 Provide a revised drawing clearly detailing the boundary of the agglomeration to which this relates. Please not that the agglomeration boundary shall include all areas serviced by the sewer network and shall include the wastewater treatment plant. All areas of the agglomeration shall be connected by the agglomeration boundary.

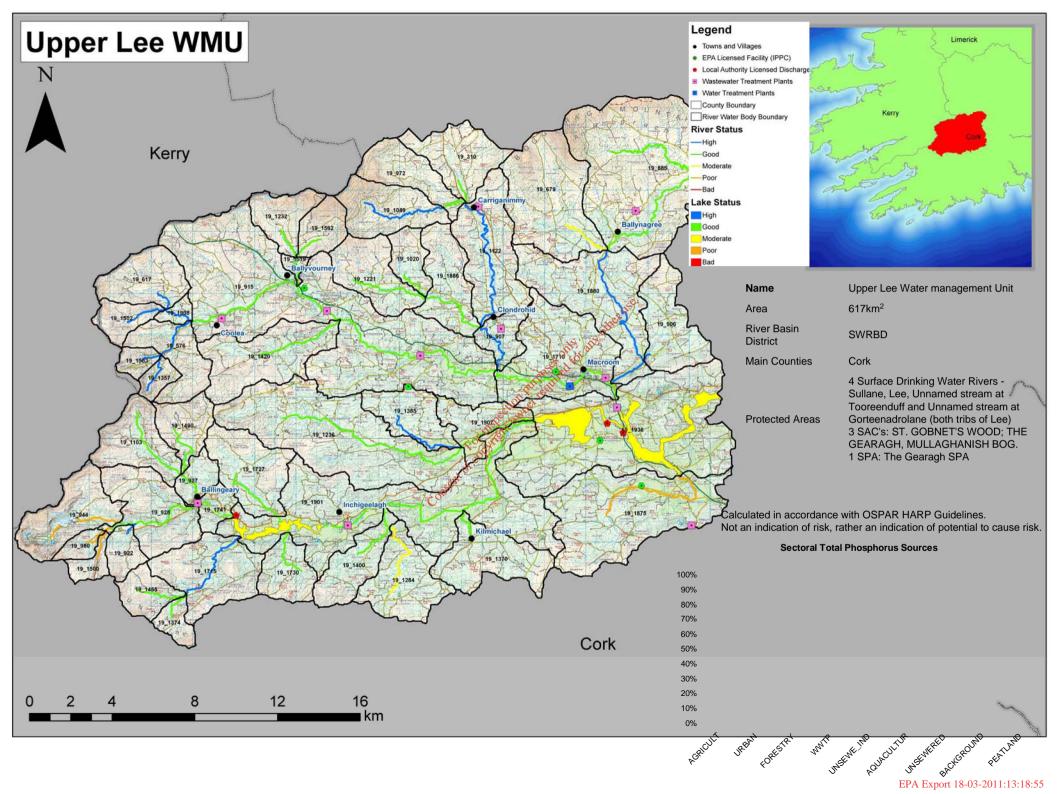
A revised Drawing No. B1_Map3 Rev A has been attached, which includes the waste water treatment plant. Drawing No. B1 Map3 Rev A is included in **Appendix 2**.

APPENDIX 1

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APPENDIX 2

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Upper Lee Water Management Unit Action Plan

STATUS/IMPA	CTS
Overall status	There are 47 water bodies in this WMU. They are mostly High Status (14) with 27 Good Status, 2 Moderate status and 4 Poor status.
Status elements	Fish and hydromorphology dictates status of the poor waterbodies. Physchem is good or high, where monitored. High and Good water bodies are generally dictated by Q scores.
Possible Impacts - EPA Water Quality	LEE (CORK): SW_19_944; SW_19_928; SW_19_1901 2002 - EPA noted the protected pearl mussel has apparently become scarce in the river in the past two decades. 2005 - there was major disruption to fauna at first location, upstream of Gouganebarra Lake (0010), where salmonid parr and other age classes had been killed. The pH of the water was 10.66 on the day, outside the limit of tolerance for these fish, which resulted from concreting work on a small bridge upstream of the sampling site. 2008 - the site was assigned Q score 4-5 (high) - RECOVERY SW_19_944 Status of WB 2009: Moderate Status dictated by hydromorph SW_19_19401 Status of WB 2009: Good Status dictated by Q status SW_19_928 Status of WB 2009: Good Status dictated by Q status CUMMER SW_19_1875 2002 - The top and middle section of the river was polluted after having being high status in previous years. 2005 and 2008 - the water quality started to improve. The bottom section has remained at a good/high quality since records began. In 2002 and 2005 pollution was detected at the top section (site 0800). However the latest ERM to 1200 and 2005 pollution was detected at the top section (site 0800). However the latest ERM to 1200 and 2005 pollution was detected by fishery status TOON: SW_19_1236; SW_19_1907 2002 - EPA found Toon river to be satisfactory throughout, for the first time since sampling began in 1990, when examined after flooding in September 2002. The pearl mussel still lives in part of the upper reaches. The lower reach, including the final location (0800), is hydromorphologically different than upstream following channelisation in the past 2005 - continuing satisfactory. SW_19_1885; SW_19_1800 2008 - Continuing satisfactory with high ecological quality at three of the site (0200, 0400, 0500) and good status a one site (0100). The top two sites surveyed (0100 and 0200) were assigned Q score 4 (good) whilst the bottom two sites were assigned Q score 4-5 (high). The protected pearl mussel lives in some stretches of the river. SW_19_885 Status of W

STATUS/IMPACTS

Possible Impacts - EPA Water Quality (CONTINUED) SULLANE - SW_19_915; SW_19_1710

2002 - EPA noted the protected pearl mussel inhabits parts of the river.

2005 - EPA found the Sullane to be continuing satisfactory. A polluted stream enters the river, from right-hand side, downstream of Ballyvourney (0170).

2008 - All sites were assigned good status, except site 0300 which was classified Q score 4-5 (high).

SW_19_915 Status of WB 2009: Good Status dictated by Q status, good fishery status and physchem status****

SW_19_1710 Status of WB 2009: Good Status dictated by Q score

FOHERISH:SW_19_1049; SW_19_972;SW_19_1122; SW_19_907 All sites continue to be assigned Q score 4-5 (high).

SW_19_1049 Status of WB: High Status dictated by Q status

SW_19_972 Status of WB: High Status dictated by Q status SW 19 1122 Status of WB: High Status dictated by Q status

2W 10 007 Status of WP: High Status dictated by Q status

SW_19_907 Status of WB: High Status dictated by Q status

AWBOY - SW 19 679

Since records began the site has been assigned either good status or above. Status of WB 2009: Good Status dictated by Q score

KEEL SW 19 310

Continuing satisfactory with good quality again recorded at the only location sampled on this tributary of the Foherish.

Status of WB 2009: Good Status dictated by Q status

DOUGLAS (SULLANE) - SW_19_1420

The Douglas (Sullane) has consistently attained good/high status. The lower site (0200) continuously has been assigned Q score 4, whilst the upper site (0700) has continuously been assigned Q score 4-5.

Status of WB 2009: Good Status dictated by Q status

GARRANE (LEE) SW_19_972

Since records began this site has been assigned Q score of 4 or 4-5 (good or high).

Status of WB: High Status dictated by Q status

CUSLOURA - SW_19_679

Consistently assigned Q score 4 (good) except in 2005 when it was assigned moderate status. This was due to the river becoming overgrown with emergent vegetation in July 2005. In 2008 EPA recorded a reverse in the quality and it was assigned Q score 4 again.

Status of WB 2009: Good Status dictated by Q status

Upper Lee Water Management Unit Action Plan

PRESSURES/RISKS								
Nutrient sources	Most TP is diffuse (92%) of which 72% comes from agriculture, 9% from forestry and 7% from unsewered properties. 8% of TP comes from Urban and WWTP.							
Point pressures	11 WWTP: - Ballinagree, Ballingeary, Ballymakera, Carranimmy, Clondrohid, Coolcower, Coolea, Inchigeela, Kilmurry, Kilnamartyra, Macroom U.D.C); 1 WTP (Macroom Pws); 4 Section 4 2 contaminated sites (Palfab Limited, Adhmaid Cill Na Martra Teoranta). 4 IPPC							
Wastewater Treatment Plants (WWTP) and Industrial Discharges	Ballingeary - Insufficient existing capacity, evidence of impact, not a protected area Ballingeary - Insufficient existing assimilative capacity (BOD), evidence of impact, not a protected area Ballymakera WWTP - Insufficient existing capacity, evidence of impact, not a protected area Ballymakera WWTP - Insufficient existing assimilative capacity (BOD), evidence of impact, not a protected area Kilmurry - Insufficient future (2015) assimilative capacity (BOD), discharge not to a protected area Macroom U.D.C. WWTP - Insufficient existing capacity, non-compliant effluent standard Macroom U.D.C. WWTP - Insufficient existing capacity of treatment plant, no evidence of impact, not a protected area Macroom U.D.C. WWTP - Insufficient future (2015) assimilative capacity (BOD), discharge not to a protected area Inchigeela - Insufficient existing assimilative capacity (BOD), evidence of impact, not a protected area							
Quarries, Mines & Landfills	3 quarries and 1 landfill. None at risk.							
Agriculture	1 WB at risk - SW_19_1875 -Cummer and Buingea Rivers							
On-site systems	There are 4499 septic tanks in this WMU. 1518 of these are located in areas of very high or extreme risk.							
Forestry	10 WB at risk from acidification - SW_19_1400, SW_19_617, SW_19_1357, SW_19_1503, SW_19_576, SW_19_1374, SW_19_1049, SW_19_1500, SW_19_1730, SW_19_1727.							
Dangerous substances	None at Risk							
Morphology	1 WB at risk - SW_19_1936 - Water Regulation and Impoundments - Carrigdrohid Reservoir, which is designated as HMWB							
Abstractions	None at risk							
Other								

Future Pressures and Developments

Throughout the river basin management cycle future pressures and developments will need to be managed to ensure compliance with the objectives of the Water Framework Directive and the Programme of Measures will need to be developed to ensure issues associated with these new pressures are addressed.

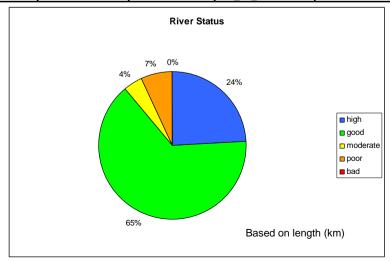
Upper Lee Water Management Unit Action Plan

SELECTED ACTION PROGRAMME NB All relevant basic measures and general supplementary measures/surveys apply								
Point Sources	Refer to point source table below for WWTP action programme							
	Section 4s & IPPCs- Review Discharge Licenses							
Diffuse Sources	AGRICULTURE - Good Agricultural Practice Regulations and Enforcement							
	FORESTRY - Measures to address acidification apply to the 10 water bodies at risk in the WMU. These are generally located to the west and south west of the WMU.							
Septic Tanks: At Risk septic tanks are to be prioritised for inspections. Subsequent upgrade or connection to municipal systems depends economic tests.								
Other	Protection of drinking water, abstraction control and future licensing. MORPHOLOGY – Impassable barriers investigation.							

Discharge)			Waterb	ody					
Point Source Discharge	County	Plants Requiring Capital Works	Agglomerations Requiring Further Investigation Prior to Capital Works	Plants Required to Commence Implementation of Pollution Reduction Programmes for Maters	Plants Requiring the Implementation of an Appropriate Performance Management System	Plants Requiring the Investigation of CSO's	Plants Required to Ensure Capacity of Treatment Plant is not Exceeded	Extended Timescale for Measure Implementation	Waterbody Code	Extended Deadline to Achieve Waterbody Objective
Ballingeary	Cork South	Yes		inshit				Yes	SW_19_927	No
Ballymakera WWTP	Cork South	Yes		FOLVILE				Yes	SW_19_915	No
Inchigeela	Cork West	Yes		8 COA				Yes	SW_19_1901	No
Kilmurry	Cork South			at o			Yes	No	SW_19_1875	No
Macroom U.D.C. WWTP	Cork South	Yes		anse.		·	Yes	Yes	SW_19_1710	No

OBJECTIVES	
Good status 2015	Protect 41 waterbodies. Restore 3 waterbodies – by 2015
Alternative Objectives	Restore 1 waterbody by 2021 (SW_19_1875) – extended deadline for nitrogen losses to surface waters via groundwaters. Restore 1 waterbody by 2021 (SW_19_980) to allow recovery from poor/bad status Restore 1 waterbody (SW_19_1500) by 2027 for forestry.

Transitional Status – Refer to separate transitional waters action programme **Groundwater Status** – Refer to separate groundwater action programme



Upper Lee Water Management Unit Action Plan - Rivers

	IE_SW_UpperLee																
			Bio		l Eleme	nts	Suppor	ting Ele	ments			P	rotected	Areas			
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrate s (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Drinking Water	Objective	Date objective to be achieved
SW_19_1020	N	SW_19_1221								G			Υ			GES	2009
SW_19_1049	Υ		Н							Н			Υ			HES	2009
SW_19_1103	N	SW_19_1420								G						GES	2009
SW_19_1122	Υ		Н							eH_			Υ			HES	2009
SW_19_1221	Υ		G						الم.	G G			Υ			GES	2009
SW_19_1232	N	SW_19_915							oth	G		Υ	Υ			GES	2009
SW_19_1236	Υ		G				G	ó	illy all.	G						GES	2009
SW_19_1284	N	SW_20_250						600	, to	M						GES	2015
SW_19_1357	N	SW_21_4731						OHIP CHIL		Н						HES	2009
SW_19_1370	N	SW_19_1710					×	ion of tex		G						GES	2009
SW_19_1374	N	SW_19_928					300	ONIT		G						GES	2009
SW_19_1385	N	SW_19_907					cot its tell	,		Н						HES	2009
SW_19_1400	N	SW_19_1236					Top9			G						GES	2009
SW_19_1420	Υ		G				of			G						GES	2009
SW_19_1455	N	SW_19_928				, Se	it.			G						GES	2009
SW_19_1490	N	SW_19_1420				CQ.				G						GES	2009
SW_19_1500	N	SW_19_944								Р						GES	2027
SW_19_1502	N	SW_21_4731								Н						HES	2009
SW_19_1503	N	SW_21_4731								Н						HES	2009
SW_19_1519	N	SW_19_915								G			Υ			GES	2009
SW_19_1562	N	SW_19_915								G		Υ	Υ			GES	2009
SW_19_1710	Υ		G				Н		Н	G					Υ	GES	2009
SW_19_1715	N	SW_21_7068								Н						HES	2009
SW_19_1727	N	SW_19_1420								G						GES	2009
SW_19_1730	N	SW_20_1491								G						GES	2009
SW_19_1741	N	SW_19_1420								G						GES	2009
SW_19_1875	Υ	_	G		Р				Н	Р						GES	2021

Upper Lee Water Management Unit Action Plan - Rivers

IE_SW_UpperLee																	
	Biological Elements						Suppor	rting Ele	ments			Р					
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrate s (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Drinking Water	Objective	Date objective to be achieved
SW_19_1880	Υ		Н							Н			Υ			HES	2009
SW_19_1886	Υ		G							G			Υ			GES	2009
SW_19_1901	Υ		G						Н	G		Υ	Υ			GES	2009
SW_19_1907	Υ		G							,G		Υ	Υ			GES	2009
SW_19_1908	N	SW_21_4731								CAR H						HES	2009
SW_19_1936	Υ								G _o din	G		Υ	Υ			GES	2009
SW_19_310	Υ		G					3	गित्रं अग्रि	G			Υ			GES	2009
SW_19_576	N	SW_21_4731						ases a	10,	Н						HES	2009
SW_19_617	N	SW_21_4731						alif quite		Н						HES	2009
SW_19_679	Υ		M				3	on Prices		M			Υ			GES	2015
SW_19_885	Υ		G				000	OWITE		G			Υ			GES	2009
SW_19_906	N	SW_19_1880					digit re	,		Н						HES	2009
SW_19_907	Υ		Н				FORTH.			Н						HES	2009
SW_19_915	Υ		G		G		of		G	G		Υ	Υ			GES	2009
SW_19_922	N	SW_21_7068				ر چوخ	N.			Н						HES	2009
SW_19_927	N	SW_19_1420				Con				G						GES	2009
SW_19_928	Υ		G						Н	G						GES	2009
SW_19_944	Υ		Р				G			Р						GES	2015
SW_19_972	Υ		G							G			Υ			GES	2009
SW_19_980	N	SW_19_944						_		Р						GES	2021

Upper Lee Water Management Unit Action Plan - Lakes

IE_SW_UpperLee																	
		Biological Elements				Supporting Elements					Protected Areas						
Member State Code	Name	Monitored Y (Extrapolated N)	Macrophytes	Chlorophyll	Fish	Morphology	Nutrient Enrichment	Physico Chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Bathing Water	Drinking Water	Objective	Date objective to be achieved
SW_19_139	Carrigdrohid Reservoir	Υ	M	G			G	G	M		Υ	Υ				GEP	2015
SW_19_4	Allua (Lough)	Υ	M	M	M		G	G	M							GES	2015

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