

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Wexford

29/10/2021

IW ref: LT0530

Re: Castletownbere Waste Water Discharge Licence Reg. No. D0297-02

Dear Inspector,

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Irish Water
Colvill House
24-26 Talbot Street
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In response to the Regulation 18(3)(b) request for information notice dated 07 October 2021 please see below further relevant information;

The Water Quality Modelling report does not clearly assess the effects of proposed discharges on the quality of shellfish waters and shellfish life. Provide an explanation for using the environmental standards set out in the Bathing Water Regulations 2008 as the target values for determining compliance with environmental quality standards. Explain how these bathing water standards relate to shellfish waters. Update the Water Quality Modelling assessment and report having regard to the achievement of objectives and standards for designated shellfish waters.

In the absence of any statutory water quality standard for bacteria in Designated Shellfish Waters the interim standard outlined in the Irish Water Technical Standards has been used. This states that the water quality at any location within a designated shellfish water shall meet the Good Bathing Water Status for *E.Coli* of ≤ 500 cfu/100 ml (at 95%ile) for the entire year (not just the summer as covered by the Bathing Water Directive).

The water quality assessment for Castletownbere demonstrated that the receiving water is classified as "Excellent" for as per the Bathing Water Quality Regulations 2008 (S.I. No. 79/2008) within circa 50m of the outfall.

Furthermore the modelled 95%ile *E.Coli* concentrations at relevant sampling locations within and in proximity to the Designated Shellfish Water are at or below limit of detection levels (10cfu/100ml) which is compatible with the achievement of WFD objectives for the Designated Shellfish Water.

Update the Water Quality Modelling report to include far field modelling of suspended solids having regard to the link between *E.Coli* and suspended solids and the proximity of shellfish waters to the proposed discharge.

Irish Water's Engineering Service Provider has been instructed to provide the additional analysis required to provide geomean concentration plots of Total Suspended Solids (TSS) from the Castletownbere WwTP, to address the query, and to prepare "delta" plots to demonstrate the relative change in TSS concentrations at Designated Shellfish Waters as a result of the proposed discharge.

As both *E.Coli* and TSS will be modelled explicitly, no analysis of the relationship between the two parameters is proposed. Irish Water will update the Agency as soon as a timeline from our Engineering Service Provider is available.

Provide information on existing or proposed measures to prevent unintended discharges into the water environment.

An emergency procedures plan is being developed for the future operation of the new WWTP to ensure unintended waste water discharges and potential impacts on the environment are kept to a minimum. Please see below for proposed measures that will be in place to help prevent unintended discharges into the water environment;

- Stormwater storage is provided at each of the 4 No. Pumping Stations (PSs) on the network in accordance with Irish Water standards.
- A total of 414m³ (minimum) storm water storage is being provided in the agglomeration.
- The PSs at the Hospital, Brandyhall Bridge and Came Woods are to be controlled independently from the Quays Terminal PS via Radio links and PLCs to maximise the storm storage volumes within the agglomeration and PS storm tanks.
- Chambers, V-notch weirs and ultrasonic flowmeters shall be included in each of the PS overflows to measure any spills.
- A mobile generator is being provided as part of the scheme to cover some power failure events.
- At the WwTP, a stormwater tank is being provided to capture all flows in excess of full flow to treatment. The tank incorporates return duty / standby pumps.
- Monitoring instrumentation is also being provided at the WWTP to log any storm overflows.
- An oil interceptor will be in place at the WwTP Site.

Yours sincerely,

sheelagh flanagan

Sheelagh Flanagan
Environmental Strategy

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