



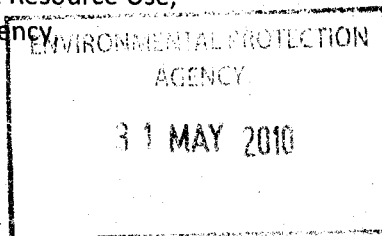
Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage

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



Our Ref: MK/1.3

28th May, 2010

Re: Castletown Wastewater Treatment Plant, Co. Meath Waste Water Discharge Certificate Application Register No. A0044-01

Dear Sir/Madam,

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

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

F. Existing Environment & Impact of the Discharge

The applicant states 'The Castletown waste water treatment plant discharges treated effluent into a tributary of the River Dee. There is no river body covering this tributary which is the location of the point discharge.

This is not the case; the treated effluent is discharged to a tributary of the Killary River (IE_NB_06_557). This tributary joins the Killary River at Yellowleas, upstream of the Killary Bridge Upper.

The Killary River contains valuable salmonid spawning and nursery habitat and as a result is a valuable tributary of the River Dee from a fisheries perspective.

The applicant should provide information regarding the flows, physico-chemical and biological data for the Killary River. 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 (in addition to a biological water quality assessment – EPA Q-index). 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.

G2. Compliance with EC Environmental Objectives (Surface Waters) Regulations 2009

The applicant has not addressed the Surface Water Regulations in the application.

The Draft Neagh Bann River Basin Management Plan reports that the Overall Status of the Killary River (IE_NB_06_557) as Moderate. The Risk Status of the river is recorded as At Risk. The Overall Objective for the river is to restore to good status by 2015.

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 Castletown 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,

Michael Kiwae SREO

PP.

Pat Doherty,
Chief Executive Officer

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