

Rhoda Davidson

From: Iain Sime
Sent: 03 June 2016 08:18
To: Corrina Mertens
Subject: RE: Kinlochmoidart Hatchery - new development -

Hi Corrina,

Thanks for the reminder about this.

I'd simply welcome and support Stephen's suggestion that the screened inlet water is returned direct to the river, rather than adding to the amount of water going through their treatment facility.

I'd also welcome TSSC's efforts to improve the quality of the discharge. As they are at the planning stage, can we suggest something? That they consider discharging direct to sea, rather than returning to the river? In the long term it may be very difficult to always provide a level of treatment that means the lower part of the SSSI remains viable, due to the sensitivities of the pearl mussels. As such, if they are considering longer term arrangements, it would be wise for them to consider something like discharging into the sea loch before making other significant investments.

Maybe suggest to Stephen and consider sending direct to [REDACTED] to ensure the message gets through?

Iain

From: Corrina Mertens
Sent: 17 May 2016 16:08
To: Iain Sime
Subject: FW: Kinlochmoidart Hatchery - new development -
Importance: High

Hi Iain any comments on the email from Stephen below?
And have you paid the landfill invoice?
Cheers
Corrina

From: Macintyre, Stephen [<mailto:stephen.macintyre@sepa.org.uk>]
Sent: 17 May 2016 15:40
To: Corrina Mertens
Subject: Kinlochmoidart Hatchery

Hi Corrina – just a quick heads up on development concerning Kinlochmoidart Hatchery

Operation has been taken over by The Scottish Salmon Company Ltd (TSSC) – site contact is [REDACTED]
[REDACTED] - [REDACTED]@scottishsalmon.com.

TSSC have also committed to implement welcome improvements to the sites wastewater treatment system – interim improvement will be put in place for remainder of 2015 with a longer term arrangements planned for 2016. There has been a recurring pattern of effluent quality compliance failures during the last 12 months which has been subject of ongoing attention by SEPA and which this work will hopefully address.

As part of the wider site development work TSSC are also putting in an inlet drum filter to screen physical debris (leaf litter) etc from the inlet water to the works. The plan was to put the reject water i.e. clean water with natural

occurring debris through the site treatment system however I have advised that I don't think this is appropriate – there is no need to add clean water to the dirty water going through the treatment system which may in fact compromise overall process efficiency. I have advised it would be preferable to simply discharge this clean water back to the river. There is potentially an added benefit as it would mean that at certain times of year (with appropriate filter size) it may be possible to catch mussel spat before it goes through the site and return it direct to the river. I think I raised this general issue last year. Work is now under way on this and I have advised TSSC to contact yourself to discuss implications with return of water from the inlet filter (it's possible that no in river work would be needed - an outfall terminating on the edge of the bank is all that would be required) and the potential consequential benefits re collection / return of mussel spat.

I hope that they will be in touch soon but if not may be worth making contact direct.

Regards
Stephen

Stephen MacIntyre, Senior Environment Protection Officer
West Highland and Argyll Team, Scottish Environment Protection Agency, Carrs Corner, Lochybridge, Fort William
PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

Rhoda Davidson

From: Macintyre, Stephen <stephen.macintyre@sepa.org.uk>
Sent: 20 July 2017 14:06
To: Corrina Mertens
Subject: 20170720_Kinlochmoidart hatchery_photographs
Attachments: p1010047.jpg; p1010041.jpg; p1010042.jpg; p1010043.jpg; p1010044.jpg; p1010045.jpg; p1010046.jpg

Copy for your info.

Stephen MacIntyre, Senior Environment Protection Officer
Scottish Environment Protection Agency, Regulatory Services North, West Highland and Argyll Team, Carrs Corner,
Lochybridge, Fort William PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Macintyre, Stephen
Sent: 20 July 2017 14:05
To: Macintyre, Stephen
Subject: 20170720_photographs















Scottish Environment Protection Agency, Regulatory Services North, West Highland and Argyll Team, Carrs Corner, Lochybridge, Fort William PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Macintyre, Stephen
Sent: 20 July 2017 14:05
To: Macintyre, Stephen
Subject: 20170720_photographs

--

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager or the sender.

Please note that for business purposes, outgoing and incoming emails from and to SNH may be monitored.

Tha am post-dealain seo agus fiosrachadh sam bith na chois dìomhair agus airson an neach no buidheann ainmichte a-mhàin. Mas e gun d' fhuair sibh am post-dealain seo le mearachd, cuiribh fios dhan manaidsear-siostaim no neach-sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

Rhoda Davidson

From: Macintyre, Stephen <stephen.macintyre@sepa.org.uk>
Sent: 21 July 2017 13:02
To: [REDACTED]
Cc: Corrina Mertens
Subject: Kinlochmoidart Hatchery_effluent improvement actions
Attachments: Interim CAS report_Kinlochmoidart hatchery.pdf

The Water Environment (Controlled Activities) (Scotland) Regulations 2011 Kinlochmoidart Hatchery – Authorisation Reference CAR/L/1001840

Hello [REDACTED] – thanks for the quick response. It is reassuring that you intend to complete the remaining improvement works over the next 2-3 weeks – the general condition of the effluent treatment infrastructure remains poor and is reflected in the present quality of effluent being discharged and the downstream impact to the River Moidart. These improvements are a welcome first step but I would highlight that depending on success further improvements may be required especially around the siting of the outfall discharge point, noting the ecological importance and sensitivity of the downstream habitat forming part of the River Moidart SAC designation. I would appreciate it if you could keep SEPA advised of progress with this work – we will likely carry out a further inspection once completed.

Following on from yesterday's inspection I have attached an Interim Compliance Assessment report detailing the present areas of concern – ELC and EMC breaches were recorded resulting in an overall interim compliance assessment for 2017 of Poor. There is however scope to improve Compliance Assessment moving through the remainder of 2017 with successful delivery of the improvements works and a resulting improvement in discharged effluent quality.

With regards to future discussions [REDACTED] however I would be happy to discuss any issues with you [REDACTED] and I will be available this pm or between 28th July to 4th August. Subsequent to this one of my colleagues will assume a lead role for the site and we will advise on this in due course.

On the issue of the manure heap – we are aware and have spent time earlier this year reviewing proximity to the river and had discussions with [REDACTED]. We appreciate the quantity increases and decreases according to time of the year – from yesterday's visit there was no evidence of any discharge from the manure heap in to the river. We will keep under review however and if you or your site staff have any specific concerns on future potential impacts to the river from this source then please raise them with us and we will follow up.

Regards
Stephen

Stephen MacIntyre, Senior Environment Protection Officer
Scottish Environment Protection Agency, Regulatory Services North, West Highland and Argyll Team, Carrs Corner,
Lochybridge, Fort William PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: [REDACTED]@scottishsalmon.com]
Sent: 20 July 2017 14:55
To: Macintyre, Stephen
Cc: 'Corrina Mertens'
Subject: RE: Kinlochmoidart Hatchery_effluent improvement actions

Hi Stephen,

I was disappointed myself when I visited last week that the works had not been carried out, this will be rectified quickly, I would like to say however quite a lot of preparation work has been done, the large settlement area was pumped out completely and totally disinfected and pressure washed and a large amount of waste from the bottom removed, also all of the bio blocks were removed and disposed of.

I'm aware that the pipework has not been put in yet and part of the reason for that is we have discovered we need to lift the filter slightly as we are replacing all the seals which are on order at present as are new screens for the whole filter.

The Scottish Salmon Company now owns the site at that will help things move along much quicker now, [REDACTED]

I can assure you that the majority of works will be completed in the next 2-3 weeks and I'd like to arrange to meet with you then to discuss further planned improvements, regarding the river sampling I'm slightly concerned that the large amount of Silage in the field next to the river could be effecting the result of the farm effluent, what's your opinion on this?

Is it within a correct distance from the water flow under Sepa rules?

Apologies again for the time its taking but moves have been made now to rectify this issue.

I look forward to hearing from you.

Regards

From: Macintyre, Stephen [<mailto:stephen.macintyre@sepa.org.uk>]
Sent: 20 July 2017 14:43
To: [REDACTED]
Cc: 'Corrina Mertens'
Subject: Kinlochmoidart Hatchery_effluent improvement actions

The Water Environment (Controlled Activities) (Scotland) Regulations 2011
Kinlochmoidart Hatchery – Authorisation Reference CAR/L/1001840

Dear [REDACTED] as you may be aware I visited Kinlochmoidart Hatchery this morning to carry out an inspection of discharge quality and downstream impacts in the River Moidart. I was disappointed to find that none of the previous agreements relating to improvement work to the sites effluent treatment system has been carried out. There has additionally been no contact to advise why the work has not been implemented. Non-compliance with conditions of the CAR authorisation were identified.

Arising from the findings of my inspection today the I will write to you formally in response to my visit today. In the interim you would like to discuss please do not hesitate to contact me.

Regards
Stephen

Stephen MacIntyre, Senior Environment Protection Officer
Scottish Environment Protection Agency, Regulatory Services North, West Highland and Argyll Team, Carrs Corner,
Lochybridge, Fort William PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Macintyre, Stephen
Sent: 30 May 2016 15:04
To: [REDACTED]
Cc: [REDACTED]
Subject: 20160530_SM response_Kinlochmoidart Hatchery_effluent improvement actions

Dear [REDACTED]

**The Water Environment (Controlled Activities) (Scotland) Regulations 2011
Kinlochmoidart Hatchery – Authorisation Reference CAR/L/1001840**

Thank you for the written confirmation of our discussions and actions arising out of our meeting on site on the 17th May.

In response I would confirm my agreement to the remedial actions as outlined below and for you to commence work to initiate the changes. We welcome your agreement that the present effluent treatment system is in need of repair and commitment to implementation of improvements.

I would however add the following general comments –

- Please ensure that the new pipe from the drum filter (by passing) the settlement pond discharges directly into the outlet channel at a point where we can obtain a representative sample i.e. with sufficient drop/clearance for sampling;
- As indicated we would appreciate being kept advised as to important dates/timescales in this process – principally the cleaning / disinfection of the existing concrete settlement tank. During these operations please ensure appropriate precautions are put in place to prevent wash waters / used disinfectant solutions from discharging into the river – the preference would be that such solutions are also removed of site by licensed contractor. Alternatively disposal by over pumping onto land with an appropriate buffer zone to the river may be a suitable alternative. In this regards I would be grateful for confirmation of your intentions;
- As discussed we would expect to see the (discussed) replacement (fibreglass) settlement tank in place and operational during early 2017.

In the interim if there is any further assistance or advice that SEPA can offer at this stage please do not hesitate to contact me.

Regards
Stephen

Stephen MacIntyre, Senior Environment Protection Officer
West Highland and Argyll Team, Scottish Environment Protection Agency, Carrs Corner, Lochybridge, Fort William
PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

SAVE PAPER -Please do not print this e-mail unless necessary;1 ream of paper =6% of a tree and 5.4kg CO2 in the atmosphere;3 sheets of A4 paper =1 litre of water

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: [REDACTED]@scottishsalmon.com]
Sent: 23 May 2016 12:00
To: Macintyre, Stephen
Subject: RE: Kinlochmoidart hatchery

Hi Stephen,
Thanks for meeting with me last week it was good to get things moving.
As discussed I hope to do some work on the effluent at Kinlochmoidart, my plan is to pipe the clean water straight from the filter to our existing discharge point taking out the middle settlement pond as this is causing a lot of the problems. Once I have that done I'll get MSIS in to completely empty all the pits get them pressure washed and disinfected, I'll then look at re-concreting the smaller existing settlement pond and making it fit for purpose this may mean we need to by-pass the filter for 1 or maybe 2 day's if that's acceptable.
I would make sure we gave you prior notice before any bypassing of the filtration system.
Let me know if the above is acceptable and I'll get started and will keep you updated of progress.

Cheers
[REDACTED]

From: Macintyre, Stephen [<mailto:stephen.macintyre@sepa.org.uk>]
Sent: 19 May 2016 15:37
To: [REDACTED]
Cc: [REDACTED]@sunbeamaquaculture.com'; [REDACTED]@sunbeamaquaculture.com'
Subject: Kinlochmoidart hatchery

[REDACTED] – thanks for opportunity to meet and discuss plans for the site this week. I have summarised our discussions in the attached Interim Compliance Assessment Reports for both site CAR authorisations - CAR/L/1001840 and CAR/L/1024866. Look forward to receiving confirmation of your plans for the effluent treatment system in due course (as discussed on receipt, I will confirm agreement by return) and the outstanding abstraction data returns for 2015.

Regards
Stephen

Stephen MacIntyre, Senior Environment Protection Officer
West Highland and Argyll Team, Scottish Environment Protection Agency, Carrs Corner, Lochybridge, Fort William
PH33 6TQ
t: 01397 704426 e: stephen.macintyre@sepa.org.uk web: www.sepa.org.uk

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk. SEPA registered office: Strathallan House, Castle Business Park, Stirling, FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Macintyre, Stephen
Sent: 19 May 2016 16:12
To: Macintyre, Stephen
Subject: Attached Image

This e-mail and any files attached with it are strictly confidential and intended solely for the addressee. It may contain information which is covered by legal, professional or other privilege and will be protected by copyright. If you have received this e-mail in error, please notify the sender immediately. If you are not the intended addressee, you must delete this e-mail and not disclose, copy or take any action on reliance of this transmission. To the extent that this e-mail is passed on by the intended addressee, care must be taken to ensure that it is in a form which accurately reflects the information contained in the original e-mail. Names, e-mail addresses and mobile phone numbers are considered personal data and should not be passed on to anyone other than the intended addressee.

Any personal views expressed in this email are not necessarily the views of The Scottish Salmon Company Ltd (SSC). E-mail is an informal means of communication and may be subject to data corruption accidentally or deliberately. This email is not intended to have contractual effect and does not form part of any contract. Although we have taken reasonable precautions to ensure that any attachment has been swept for viruses we cannot accept liability for any loss or damage caused by software viruses.



1. Assessment Summary

Licence reference number: CAR/L/1001840
 ELC assessment: Minor Breach(es) / 1 Gross Breach
 Interim EMC assessment: Low Performance
 Overall interim assessment: Poor
 Safety risk assessment for site (Is the current RA adequate? Are there any particular additional risks? in place)

2. Assessment Details

Date and time of assessment: 21/07/2017 10:45
 Site name: Kinlochmoidart Hatchery
 Site address: Kinlochmoidart, Acharacle
 Assessment type: Standard inspection

3. Components of licence assessed

Environmental Limit Condition (ELC)

Licence condition number	ELC assessment - (compliant, minor, repeated minor, gross or significant)	Description of non-compliance with ELC (include follow-up actions to rectify non-compliance, timescales and reporting requirements) - Where several breached ELCs are linked, refer to first condition number and associated non-compliance described
1.1.1	No Breaches	-
1.1.2	No Breaches	-
2.6.1	Minor	-
3.4.1	Gross	-

Environmental Management Condition (EMC)

EMC attribute	Licence condition number	EMC assessment - (compliant, minor, major)	Overall assessment	Description of non-compliance with EMC (include follow-up actions to rectify non-compliance, timescales and reporting requirements) - Where there is a link to a breached ELC refer to condition number as identified above
Operational condition of plant and infrastructure	-	Major	Major	-
Knowledge of licence by appropriate staff	-	Compliant	Compliant	-

4. Other items identified / discussed (include licence, development and good practice issues)

Inspection / site visit to review progress with upgrade/improvements to the sites effluent treatment system and to carry out downstream impact assessment.

Proposed improvements to effluent treatment system were previously agreed in principle - in summary use of bio blocks and final settlement tank in present form to be discontinued. New fibreglass settlement tank to be installed during 2017 with interim arrangements put in place for 2016 (effluent from drum filter to be piped to outflow channel, settlement tank to be emptied and cleaned with improvements implemented to blockwork/walls of sludge tank.

Inspection findings confirmed that improvements have not been delivered. Subsequent confirmation however that preparation work completed - settlement tank emptied, cleaned and disinfected. Commitment to complete remainder of identified work in the next 2-3 weeks. Further discussions / inspection to be carried out in respect of delivery of remaining improvement works.

Non compliance issues identified during inspection -

Condition 3.4.1 - The effluent shall be subject to a process designed and operated to be at least equivalent to a 60 micrometre mesh screen in the removal of solid matter. Assessed as **Gross ELC breach** – although the drum filter was in operation there was clear carry over of fine solid matter, including clumps of fungal growths (breaking off from the settlement tank) into the river.

Condition 2.6.1 - Other than as specifically permitted or limited by any condition of this licence, none of the authorised activities shall have a significant adverse impact on, or cause pollution of, the water environment. Assessed as **Minor ELC breach** – there was visible impact to substrate of river, including fungal growths out with the direct mixing zone around the outfall.

Operational condition of plant and infrastructure – effluent treatment infrastructure remains in a continuing poor condition. Assessed as **Major EMC breach** – failure to deliver previous commitments to improve operational condition of effluent treatment infrastructure and no communication or agreement to alternative timescale.

5. Inspection specific details (complete all relevant sections)

Other SEPA staff present: none
 Operator representatives met on site: general discussion with on site staff
 Relevant weather: sunny - low to moderate river flows

6. Assessment sign-off

Name of inspecting officer: Stephen Macintyre
 Team name: West Highlands & Argyll
 Signature:

[Redacted signature box]

Date signed:

21/07/2017

7. Office information only

Was the inspection announced?: Yes
 Adhoc / Follow Up: n/a
 Inspection code: 207866CAR_PS
 Schedule type: NORTH_OPS-W_HI_AR-FW
 Month scheduled: OCT
 Month completed: 21/07/2017
 Registry copy required? No
 File reference: CAR/L/1001840

Name of person who input data to NEMS:

[Redacted name box]

Date of input to NEMS:

[Redacted date box]