

SEPA Environmental Event Report

Elms Event Number ENV/0899819
Event Description Loch Tralaig w ater level and odour

Notification Number 1

Reported By
Surname
Forename
Organisation Name
Address 1
Address 2
Address 3
Town
Post Code
Tel No
Fax No
Email Address

Origin Public Complainant
Affected Medium Inland Waters
Investigating Team Argyll, Hebrides and South Highland
Investigating Officer

Receiving Officer
Time Received 14:30:00
Date Received 02-JUL-19

Time Responded 14:30:00
Date Responded 02-JUL-19
Within 24? Yes

Location Kames Fish Farming Ltd, Loch Tralaig FCFF, Kilninver, Oban

Located Notifiers Address? No

Date Event Occurred 02-JUL-19

Site Name **RSA Site?** No

Catchment Knapdale Coastal

Mental H&S Assessment Low

Assessment Description

Impact Category 4 - Other

Type Chemicals

Cause Other

Sector Industry

Source Other

Sepa Activity Controlled Activity Regulations (CAR)

Potential Hazard

Farm Name

Complainants Notified? Yes **Details**

SEPA Environmental Event Report

Action

Description

██████████ for the past 3 months water levels have been extremely low. ██████████ says the loch has been 'dead' for the last two months, the water is stinking, and ██████████ hasn't seen any of the wildlife ██████████ normally sees regularly (Ospreys, eagles, otters, fish, smolt). ██████████

██████████ concerned that the deterioration may have been caused either by the fish farm increasing its capacity by 300% or by the hydro scheme abstracting too much water.

██████████ aware SEPA monitors water quality monthly, but says the samples are taken at a freshwater inlet. ██████████ thinks sampling should be done at the fish farm instead.

2/7/19 14:30 ██████████ called complainant to discuss

10/7/2019 ██████████ visits Kames for Loch Tralaig record inspection.

13.08.2017 ██████████ calls looking for update. ██████████ returns call. ██████████ very angry and frustrated re perceived impact on loch and lack of action from SEPA. ██████████ makes lots of allegations re poor mgmt from fish farm and severe impact on loch, saying ██████████ would make a complaint about SEPA's action to date. Agreed in end that ██████████ would email to lay out situation in its entirety and SEPA would then call ██████████ to discuss.

16/09/2019 - ██████████ has obtained information from Kames about production and tonnages of food used etc. ██████████ prepares a response and sends to complainant which results in further discussion. Complainant reiterates concerns about production rates and records to SEPA, what the fungus disease was and whether or not it is possible it could be affecting native fish stocks. Loch levels in Tralaig have been fluctuating widely of late as SSE is operating reservoir at a lower starting position than normal to offset renewable energy generation from wind to water. This may be impacting on food available in littoral zone but not sure if this could be proven. Complainant concerned over use of same volumes of chemicals in a loch with reduced water levels and wants this to be remodelled. Also has concerns about smell/odours from fish farm and chemical/formalin use at site. SSE has stopped flushing sluice gates at Loch Tralaig about three years ago and this may be resulting in less juveniles making it into the loch to grow to adult size. Not sure how this relates to loch ecology and impact on fish populations and further investigation is likely required.

Waiting for further response from ██████████ to obtain further information from Kames/Fish Farm Operator and ██████████ to consider what other work could be done, speak with ██████████ and get water level data from ██████████ as this has still not been forthcoming.

Sunday times response - 19 July 2019

THE SUNDAY TIMES : LOCH ARKAIG

A spokesperson from SEPA, said:

“Every day SEPA works to protect and enhance Scotland’s environment.

“Formaldehyde is authorised under strict limits at Loch Arkaig. The use of chemicals at the site are controlled by the site licence. The records below outline monthly use at the site, as submitted as part of the operators data returns. Chemical records are audited as part of SEPA’s routine compliance inspections and the site’s current compliance is rated as ‘excellent’.”

Car license CAR/L/1002071. Data returns highlight use as outlined below:

Month and year	Formaldehyde (active ingredient in grams) total
May 2017	-
June 2017	-
July 2017	-
Aug 2017	356,250
Sep 2017	1,106,250
Oct 2017	3,226,875
Nov 2017	2,212,500
Dec 2017	56,250
Jan 2018	-
Feb 2018	-
Mar 2018	-
Apr 2018	-
May 2018	-
May 2018	-
June 2018	-
July 2018	-
Aug 2018	-
Sep 2018	18,780
Oct 2018	206,250
Nov 2018	393,750
Dec 2018	1,258,125
Jan 2019	675,000
Feb 2019	1,350,000
Mar 2019	2,291,250
Apr 2019	2,295,625
May 2019	-

The Ferret response - 28 June 2019

A spokesperson from SEPA, said:

“Every day SEPA works to protect and enhance Scotland’s environment.

“Uncontrolled releases of formaldehyde have the potential to cause significant harm to the environment. It is therefore important to ensure that formaldehyde is stored, handled and used appropriately to minimise the risk of any uncontrolled releases.

“The use of formaldehyde is authorised at the Russel Burn hatchery by SEPA and the operators are required to record each individual use of formaldehyde. These records are audited as part of SEPA’s routine compliance inspections.

“We take any allegations of environmental breaches very seriously and as an evidenced based organisation we would always take action to investigate where information comes to light. We would therefore encourage anyone with information of non-compliance to contact SEPA, in confidence, via the Pollution Hotline 0800 80 70 60.”



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Analytical Report

Sample from : River Oude d/s of Loch Tralaig road bridge, Kilmelford

Date and Time of Sample: 14-Nov-19 at 16:25 Location Code : 102850 Version Number: 1
 Sample Number: 3779521 Taken By : ██████████
 Sample Type: Loch Water Team Area: Argyll, Hebrides and South Highland

Test Reference	Notes	Determinand	Result
ES-INR-P-006	EC	pH	6.79 pH units
ES-INR-P-006	EC	Alkalinity (as CaCO ₃)	15.0 mg/L
ES-INR-P-006	EC	Electrical conductivity (25°C)	58.5 µS/cm
ES-INN-P-015	EC	Total Oxidised Nitrogen (as N)	<0.148 mg/L
ES-INN-P-015	EC	Nitrate (as N)	<0.148 mg/L
ES-INN-P-015	EC	Nitrite (as N)	<0.007 mg/L
ES-INN-P-015	EC	Ammoniacal Nitrogen (as N)	<0.024 mg/L
ES-INN-P-015	EC	Reactive Phosphorus (as P)	<0.008 mg/L
ES-INN-P-015	EC	Chloride	6.87 mg/L
ES-TORG-P-215	* EC	Formaldehyde	<6.00 µg/L

Authorised By ██████████ - ██████████ 04/12/2019

Notes:

- AB - Test carried out in the Aberdeen laboratory
- EC - Test carried out in the Eurocentral laboratory
- OP - Test result supplied by Operator and compliant with MACS scheme
- # - Test carried out by a subcontracted laboratory
- * - Test not UKAS accredited
- § - Test carried out under laboratory's flexible scope of accreditation



1327

Analytical Report

Sample from : Loch Tralaig at shore, E of Dam

Date and Time of Sample: 14-Nov-19 at 16:05 Location Code : 571577 Version Number: 1
 Sample Number: 3779563 Taken By : ██████████
 Sample Type: Loch Water Team Area: Argyll, Hebrides and South Highland

Test Reference	Notes	Determinand	Result
ES-INR-P-006	EC	pH	6.78 pH units
ES-INR-P-006	EC	Alkalinity (as CaCO ₃)	14.2 mg/L
ES-INR-P-006	EC	Electrical conductivity (25°C)	57.3 µS/cm
ES-INN-P-015	EC	Total Oxidised Nitrogen (as N)	<0.148 mg/L
ES-INN-P-015	EC	Nitrate (as N)	<0.148 mg/L
ES-INN-P-015	EC	Nitrite (as N)	<0.007 mg/L
ES-INN-P-015	EC	Ammoniacal Nitrogen (as N)	<0.024 mg/L
ES-INN-P-015	EC	Reactive Phosphorus (as P)	<0.008 mg/L
ES-INN-P-015	EC	Chloride	7.07 mg/L
ES-TORG-P-215	* EC	Formaldehyde	<6.00 µg/L

Authorised By ██████████ - ██████████ 04/12/2019

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Analytical Report

Sample from : Loch Tralaig (Control 2) @ W of Innie House, Kilninver, Oban

Date and Time of Sample: 4-Dec-19 at 12:45 Location Code : 103630 Version Number: 1
 Sample Number: 3789942 Taken By : ██████████
 Sample Type: Loch Water Team Area: Argyll, Hebrides and South Highland

Test Reference	Notes	Determinand	Result
ES-TORG-P-215	* EC	Formaldehyde	<6.00 µg/L

Authorised By ██████████ - ██████████ 13/12/2019

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Analytical Report

Sample from : Loch Tralaig (Control 2) @ W of Innie House, Kilninver, Oban

Date and Time of Sample: 4-Dec-19 at 12:45 Location Code : 103630 Version Number: 1
 Sample Number: 3789942 Taken By : ██████████
 Sample Type: Loch Water Team Area: Argyll, Hebrides and South Highland

Test Reference	Notes	Determinand	Result
ES-TORG-P-215	* EC	Formaldehyde	<6.00 µg/L

Authorised By ██████████ - ██████████ 13/12/2019

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