



# CAVAN COUNTY COUNCIL

Comhairle Chontae an Chabháin

Telephone: (049) 4331799/4361799  
Fax: (049) 4361565

Courthouse  
Teach Na Cúirte

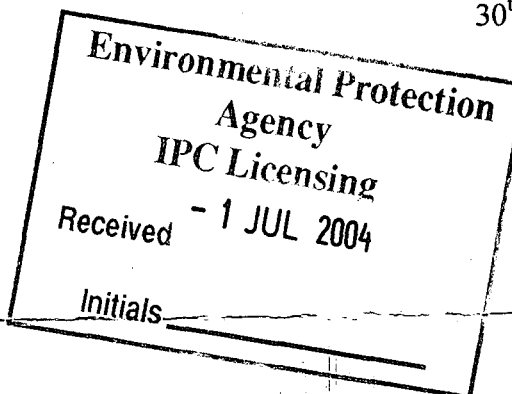
Correspondence should be addressed to:  
CENTRAL ADMINISTRATION DEPARTMENT

Cavan  
An Chabhán

Our Ref.: PC/OH

30<sup>th</sup> June 2004

Ms. Noeleen Roche,  
Office of Licensing & Guidance,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Johnstown,  
Co. Wexford.



**Re: Review of IPC Licence 406-Bailieboro Foods Ltd and Bailie Foods Ireland Ltd**  
**Review Reference Number: 722**

Dear Ms. Roche,

I refer to your letter regarding your proposal to review the above licence and I draw your attention to the letter dated 17<sup>th</sup> June, 2004 sent to the Agency by Cavan County Council. It is the view of Cavan County Council that the operations of this facility are causing a significant deterioration in the quality of the surface waters adjacent to the facility. In particular, it appears that the present method of "spray irrigation" of lands with effluent is not being carried out in a properly controlled manner.

Any review of this licence should address this issue. It should be a requirement of any reviewed licence that the quality of surface waters should be monitored by the company upstream and downstream of all discharges.

Yours sincerely,

**P. Cork, Senior Engineer,  
Environment Section.**

**EPA**

Main File ✓  
Public File ✓X2  
Evaluation File EC  
Date 1/7/04 H



# CAVAN COUNTY COUNCIL

Comhairle Chontae an Chabháin

Telephone: (049) 4331799/4361799  
Fax: (049) 4361565

Courthouse  
Teach Na Cúirte

Correspondence should be addressed to:  
CENTRAL ADMINISTRATION DEPARTMENT

Cavan  
An Chabháin

Our Ref.: PC/OH

5<sup>th</sup> July 2004

Ms. Noeleen Roche,  
Office of Licensing & Guidance,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Johnstown,  
Co. Wexford.

**Re: Review of IPC Licence 406-Bailieboro Foods Ltd and Bailie Foods Ireland Ltd**  
**Review Reference Number: 722**

Dear Ms. Roche,

I refer to our letter dated 30<sup>th</sup> June, 2004.

Please find enclosed our letter dated 17<sup>th</sup> June, 2004 and attachments sent to Liam Ó Súilleabháin, Regional Inspectorate, Castlebar which were referenced in our previous letter.

Yours sincerely,

**P. Cork, Senior Engineer,  
Environment Section.**

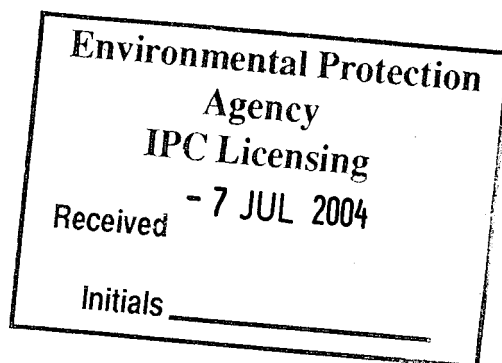
**EPA**

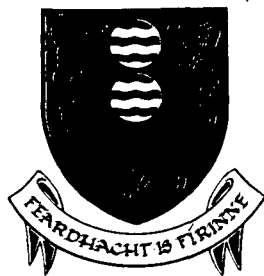
Main File ✓

Public File ✓

Evaluation File 7/2

Date 8/7/04





# CAVAN COUNTY COUNCIL

Comhairle Chontae an Chabháin

Telephone: (049) 4331799/4361799

Fax: (049) 4361565

Courthouse  
Teach Na Cúirce

Correspondence should be addressed to:  
CENTRAL ADMINISTRATION DEPARTMENT

Cavan  
An Chabhán

Our Ref.: PC/OH

17<sup>th</sup> June 2004

Mr. Liam Ó Súilleabháin,  
Office of the Environmental Enforcement,  
Regional Inspectorate,  
John Moore Road,  
Castlebar,  
Co. Mayo.

**Re: IPC Licence 406 - Bailieboro Foods Ltd and Bailie Foods Ireland Ltd,  
Your Ref; M406/ca011os.doc**

Dear Mr. Ó Súilleabháin,

Further to the above letter and attachments I wish to reply as follows. Attached is a report based on a field visit, by Council staff, to the lands in the vicinity of the factory. This was a routine visit and was not carried out with any prior knowledge or forewarning regarding the alleged problems with the spray irrigation system.

The report clearly shows that the river suffered a decrease in quality. You informed me in a phone conversation that irrigation equipment had failed on the date of the inspection.

The company, in its letter dated 1<sup>st</sup> October, 2003, implies that it does not believe that the deterioration in the river water quality in the vicinity of the factory is due to its operations. Cavan County Council believes that until evidence shows otherwise, the factory operation remains the prime suspect as the source of the quality problems.

This river remains a pollution "hotspot" in the county and further investigations will be carried out.

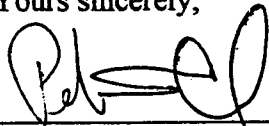
To assist the Council with this work you are requested to provide the Council with information on the lands used for spray irrigation.

1. Is there a nutrient management plan in place for these lands?
2. What are the results of the most recent soil P tests for the land parcels?
3. In consideration of the high conductivity of the discharge from the spreadlands, is this the result of a saline solution and what are the effects of such a discharge on the spreadlands and receiving waters?

4. What is the volume of liquid that is applied to the spreadlands and for how long has this landspreading been taking place?
5. It is noted that the IPC licence has provision for the phasing out of the landspreading of treated waste water. What progress has been made in this regard?

Thank you for your cooperation.

Yours sincerely,



**P. Cork, Senior Engineer,  
Environment Section.**

For inspection purposes only.  
Consent of copyright owner required for any other use.

## MEMORANDUM

**From:** Martina Smith  
Temporary Environmental  
Technician Grade II

**To:** Colm O Callaghan  
Senior Executive Chemist

**Date:** 10/06/04

**Subject:** Baileboro Foods Limited and Bailie Foods Ireland Limited.

A walk of the River Lear adjacent to the plants named above and of their associated spreadlands was carried out on the 27<sup>th</sup> of May 2004. This walk was to find reason for the deterioration in water quality at Lear Bridge.

During the inspection of the spreadlands it was noted that large quantities of effluent were being applied to the land via the spray irrigation system. The effluent application rates were so heavy that the effluent was ponding on the surface of the fields on which it was being sprayed and the effluent then eroded two channels in the river banks as it discharged to the stream (Grid Ref 682 984).

Samples were taken at nine locations along the river. See figure 1 for sample locations. These samples were then returned to Cavan County Council's Water Laboratory for analysis. The results were as follows:

Sample Point	Sample Number	COD mg/l O <sub>2</sub>	BOD mg/l	Suspended Solids mg/l	pH	Conductivity µS/cm	Ortho Phosphate µg/l
u/s Bailie Foods Spreadlands	1	20	2	<10	8.70	195	2.8
Discharge from Spreadlands	2	128	32	144	8.78	>11766	122.9
u/s of first tributary	3	32	3	<10	8.64	681	26.7
u/s of second tributary	4	33	4	12	8.59	710	27.0
d/s of second tributary	5	16	2	<10	7.95	336	5.8

u/s of council discharge	6	29	3	<10	8.49	683	26.0
d/s of council discharge	7	28	4	<10	8.36	627	29.9
d/s of cooling water discharge	8	21	4	10	8.25	498	22.4
d/s Bailie Foods plant	9	26	4	<10	8.32	600	28.6

The results clearly show that the discharges from the spread lands at Bailie Foods are having a negative impact on the overall water quality.

If sample number 1 (upstream Bailie Foods spread lands) and sample number 8 (downstream Bailie Foods plant) are compared a number of issues are highlighted. The ortho P increases 10 fold from 2.8µg/l P to 28.6 µg/l P. The conductivity also increases from 195 µS/cm to 600 µS/cm. The other parameters analysed do not show such a significant leap.

The results do highlight however that the impact of the two tributaries on the river is negligible in fact the second tributary seems to act as a diluting factor which may suggest that the water quality here is better than the River Lear itself. The sudden drop in ortho p levels and conductivity levels in sample 5 could quite possibly highlight an error in sampling. Due to this error the sample may be more representative of the tributary water than of the River Lear itself.

The County Councils discharge can also be eliminated as a contributing factor to the deterioration of the water quality at Lear Bridge as the results clearly show that it is not having a major impact on the water quality.

### **Conclusion:**

In conclusion the results of the analyses show that the major impact on this stretch of river is in fact Bailie Foods due to their poor effluent spreading practices. At no stage

along the length of the river sampled do the Ortho-p or Conductivity levels recover to what they were before the discharge of effluent from the Bailie Foods spread lands.

Martina Smith

Martina Smith

For inspection purposes only.  
Consent of copyright owner required for any other use.



Small Tributary 1  
approx 75m  
upstream

W3.2 Upstream of  
Spray Irrigation (250m approx)  
1. approx 200m upstream of point 3  
2. approx 100m upstream of point 3

3 u/s 1st Tributary  
← Tributary

Figure 1  
Map showing  
location  
of  
Bailieborough

LORRY PARKING  
AREA

Small tributary from  
Kingscourt side of  
Bailieborough town.

4 u/s Second  
Tributary

5 d/s Second  
Tributary

W3.3  
Downstream  
Spray Irr

Main Public Roadway

BAILIE FOODS SITE

Steel railing  
on wall

'BAILIE FOODS  
HEAD OFFICE SITE'

For inspection purposes only  
Consent of copyright owner required for any other use

Bank

Minor Public Roadway

Evaporator

Separators

Butter  
Making  
Room

CREAMERY SITE

Garage

Grassed Area

W2g

7. d/s Council  
discharge

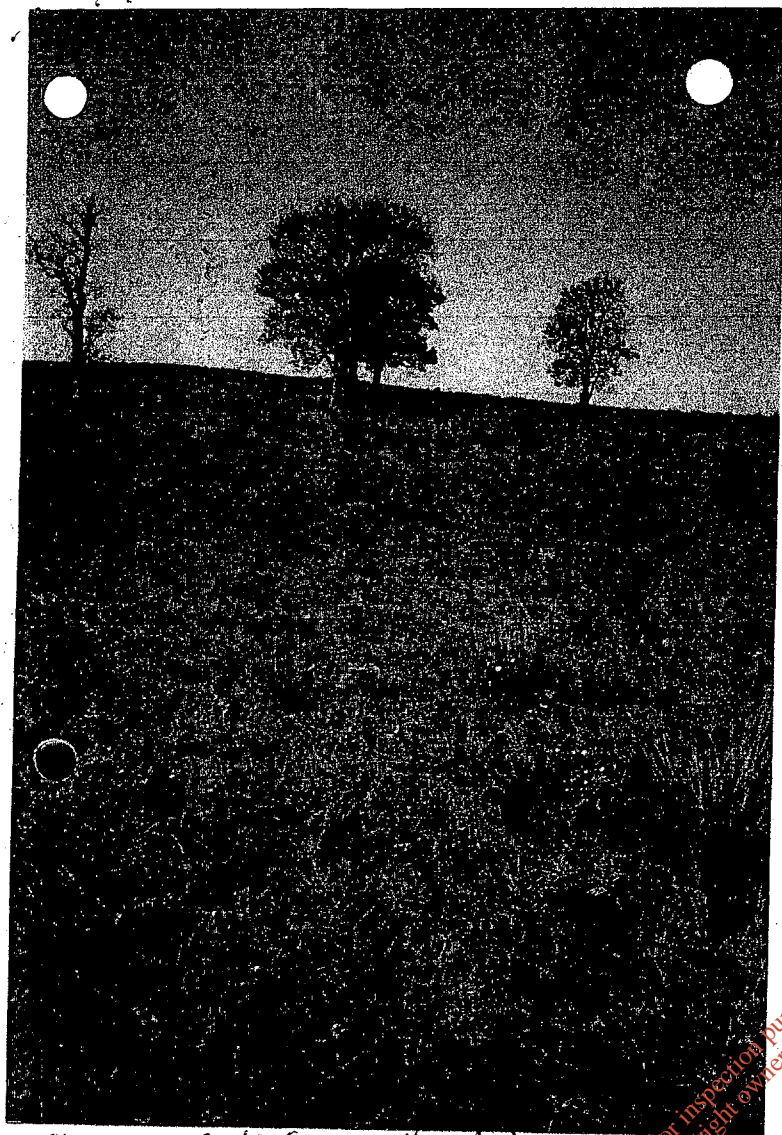
obsolete

Co. Council  
Discharge  
Chain Link Fence

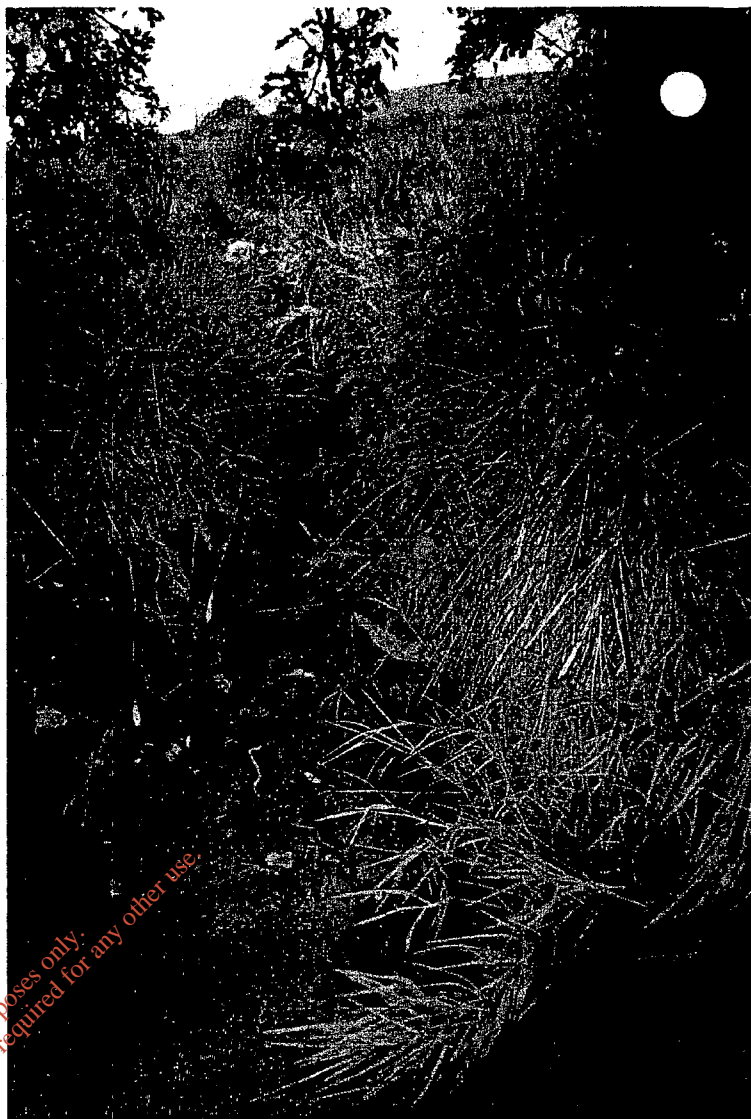
W2j  
monitoring after  
Cooling discharge

The Environmental Protection Agency  
The Environment Agency  
71 NOV 2003  
IPC ENFORCEMENT





Slope of field (spreadlands)  
Marking Smith 27/05/04.

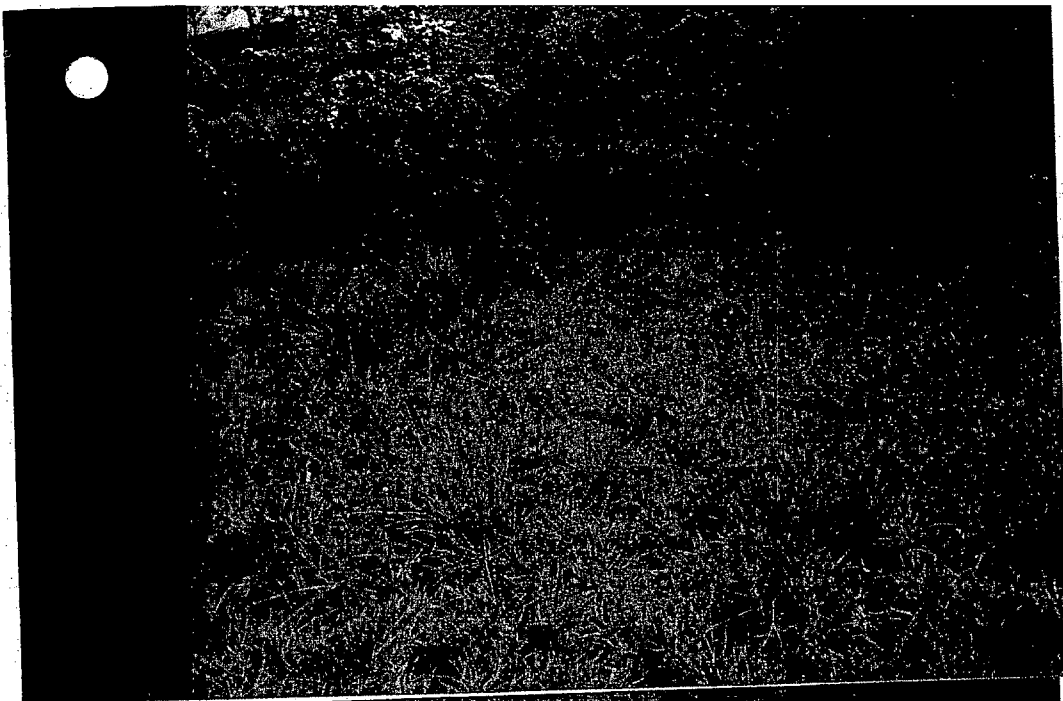


Discharge No. 2 to River  
Marking Smith 27/05/04



2 discharges to River from Bailey Foods  
spreadlands

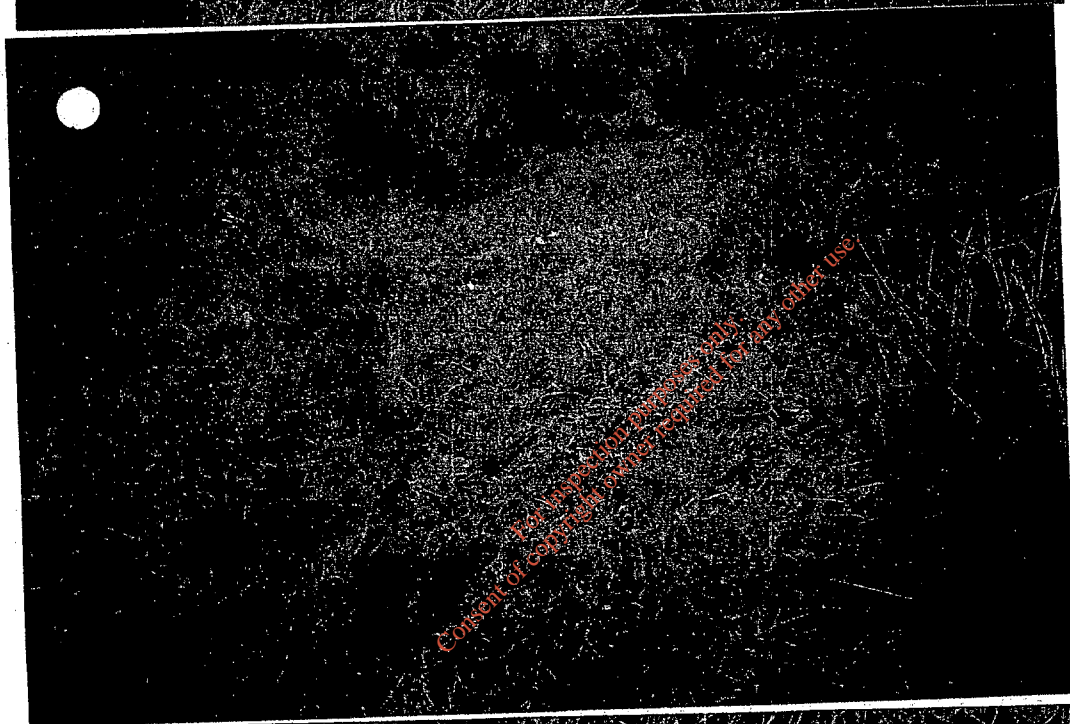
Marking Smith 27/05/04



Ponded  
Effluent

Martina  
Smith

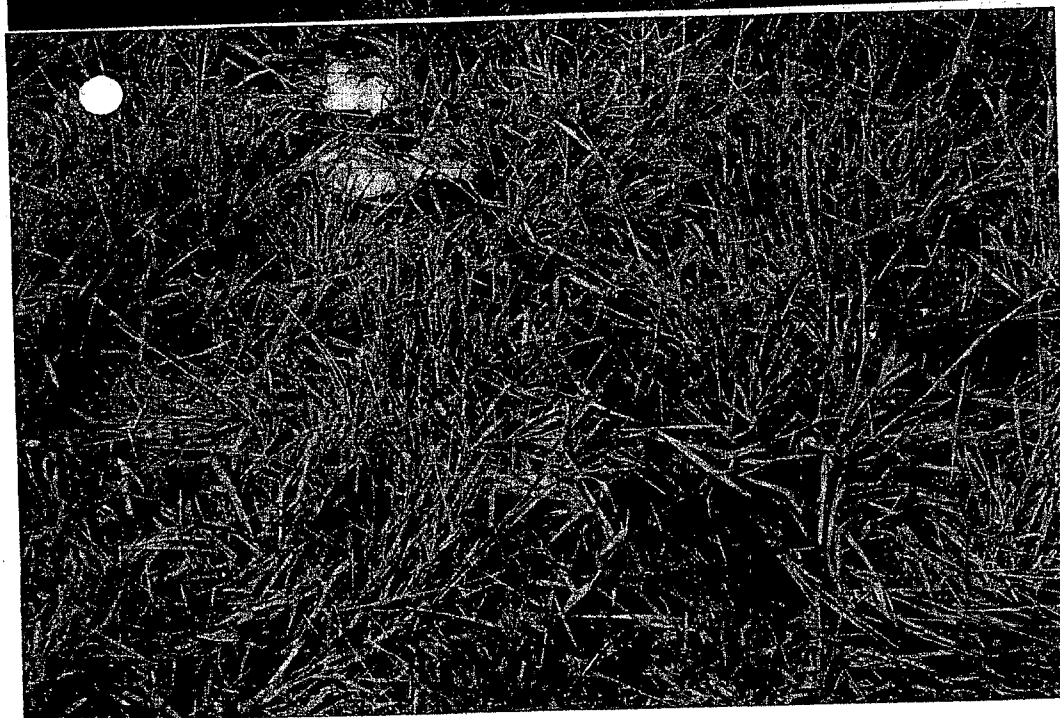
27/05/04



Ponded  
Effluent

Martina  
Smith

27/05/04

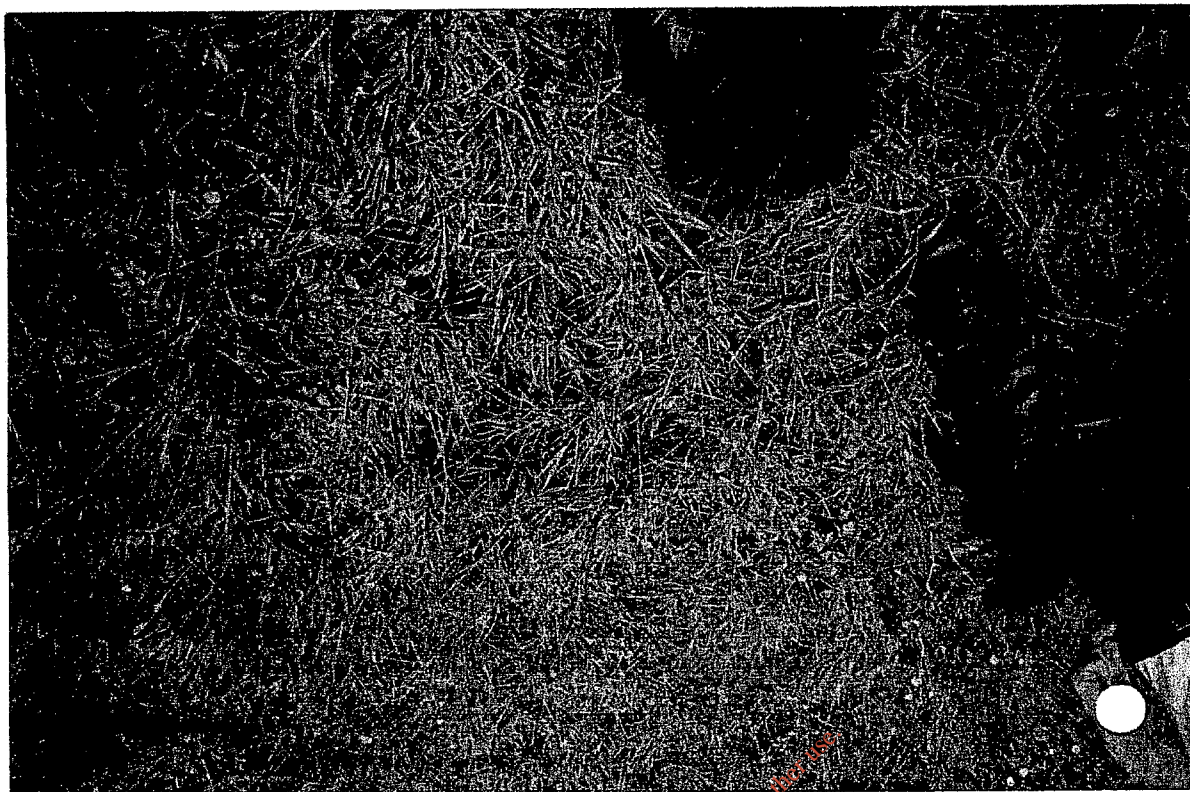


Ponded  
Effluent

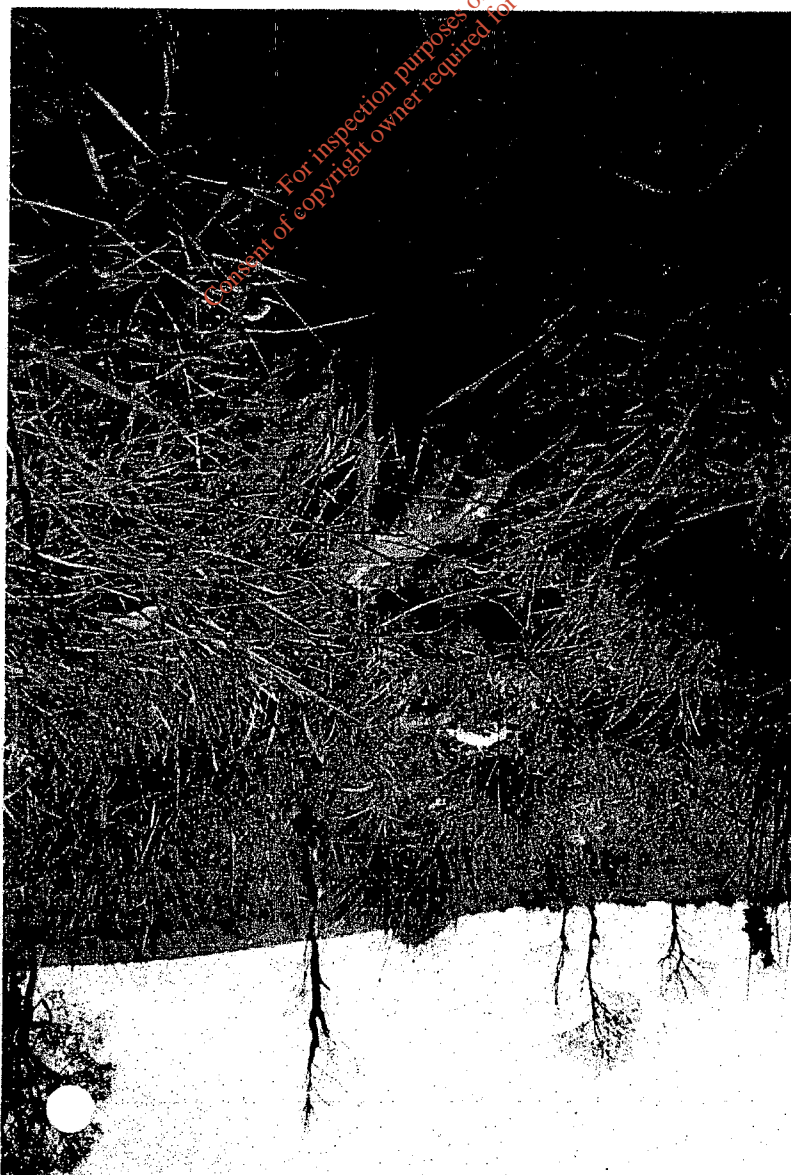
Martina  
Smith

27/05/04





Packed  
 Effluent  
 at 10/5/02  
 Alvarado  
 Smith



For inspection purposes only.  
 Removal of copyright owner required for any other use.

Discharge  
 1 to  
 River  
 Alvarado  
 Smith  
 at 10/5/04

# MEMO

TO: Emer Cooney

FROM: Noeleen Roche

DATE: 01/07/2004

SUBJECT: **Submission from Cavan County Council**

**Re: Bailieboro Foods Limited and Bailie Foods Ireland Limited**  
**Reg. No: (722)**

Please find attached a submission in connection with the Integrated Pollution Control licence review application submitted by Bailieboro Foods Limited and Bailie Foods Ireland. The Agency's reply is also attached.

Please consider this a formal submission to be given full consideration insofar as it relates to Integrated Pollution Control.

For inspection purposes only.  
Consent of copyright owner required for any other use.

EPA

Main File ✓

Public File \_\_\_\_\_

Evaluation File \_\_\_\_\_

Date 1/7/04 me



Environmental Protection Agency  
An Ghníomhaireacht um Chaomhnú Comhshaoil

Mr/Ms. P. Cook  
Senior Engineer  
Environment Section  
Central Administration Department  
Cavan County Council  
Courthouse  
Cavan

PO Box 3000, Johnstown Castle Estate  
County Wexford, Ireland  
Bosca Poist 3000, Eastát Chaisleán Bhaile Sheáin  
Contae Loch Garman, Éire

T: +353 53 60600  
F: +353 53 60699  
E: info@epa.ie  
W: www.epa.ie

Lo Call: 1890 33 55 99

01/07/2004

Reg. No: 722

Dear Mr/Ms Cook

I acknowledge receipt of your letter on 1st July 2004 in relation to a review application for an Integrated Pollution Control (IPC) revised licence by Bailieboro Foods Limited and Bailie Foods Ireland Limited, Lear, Bailieboro, County Cavan, (Reg. No. 722).

I am to advise you that your letter will be treated as a formal submission and will be considered as part of the examination and processing of the application. Your comments will be taken into account when determining the application.

The details of the proposed determination of this application by the Agency will be automatically notified to you in accordance with the requirements of the EPA Act 1992.

Yours sincerely

Noeleen Roche  
Office of Licensing & Guidance

EPA  
Main File ✓  
Public File ✓X2  
Evaluation File EC  
Date 1/7/04