

**From:** Noeleen Roche  
**Sent:** 10 May 2006 10:23  
**To:** Lisa McGuire  
**Subject:** FW: DAIRYGOLD IPC 404 & IPC 775.  
**From:** Wexford Receptionist  
**Sent:** 10 May 2006 09:07  
**To:** G Oglesby/D Richards (sharing)  
**Subject:** FW: DAIRYGOLD IPC 404 & IPC 775.

Rec'd at info...tks

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**From:** kfinn [mailto:kfinn@esatclear.ie]  
**Sent:** 09 May 2006 02:43  
**To:** Wexford Receptionist  
**Subject:** Re: DAIRYGOLD IPC 404 & IPC 775.

**Sent to Dee Richards OLG Emily W OEE Wed 10.5.06**

**Submission on DAIRYGOLD IPC 404 & IPC 775.**

In the review of the above Licenses, you might please consider the following:

1. When the Dairygold facility malfunctions and there is a problem in particular with Mal-odours, the effluent plant in one way or another becomes overloaded. It seems logical to me in this instance that a condition of their licence be that the product being delivered to the plant be stopped or reduced or curtailed immediately for a period of time until the ETP is righted/rebalanced again and the mal-odour problem is confirmed by an independent source as having been eliminated.
2. Checking, on foot of a complaint re Noise or mal-odour or other from a member of the public needs to be done by a person who is remote from the DG plants or similar noise/mal-odour environments such that they are not pre-conditioned and desensitised by them.
3. The Annual Noise Survey of the Castlefarm facility needs to be done at a time when the wind is predicted to be from the NW and the plant is in full production.
4. In re the Annual Noise survey, I request that a noise monitoring point be designated at a point on

Kingston Close at the centre of the south edge of the road opposite the centre of the front door to No 3 Kingston Close, where the Castlefarm Niro towers & plant are in direct view and barriers to noise transmission are locally at a minimum.

5. I understand that DG propose to address the problem of mal-odour from their Castlefarm facility by application of chemical deodorisers and additives. In my view these are problematical in that:

- a. Their application is non responsive to sudden peaks in load to the ETP.
- b. Their application is subject to human error.
- c. They are a treatment based rather than preventative based solution.
- d. The ETP facility is not manned 24 hours and both detection and treatment action response times are demonstrably inadequate.
- e. The effectiveness response times of such chemical based solutions are long/too long.
- f. The loading coming into the plant is subject to sudden surges.
- g. The plant itself is under designed and/or overloaded as it stands and has no spare capacity, making it impossible to deal with surges giving rise to mal odours.

In my view the only complete solution is to enclose the plant in-house and apply an air filtration & purification system to the exhaust air. This is part of the best available technology required under BAT criteria. Anything less is only tinkering with the problem(s) and non compliant with BAT criteria.

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