



Western Regional Fisheries Board

Bord Iascaigh Réigiúnach an Iarthair

18th January 2007.

Ms. Ann Kehoe,
Office of Licensing and Guidance,
EPA,
Johnstown Castle,
Co. Wexford,

Dear **Ms. Kehoe,**

OBJECTION BY THE WESTERN REGIONAL FISHERIES BOARD AGAINST PROPOSED DETERMINATION ON THE APPLICATION FOR A REVIEW OF AN IPPC LICENCE FROM DAWN MEATS TRADING AS WESTERN PROTEINS HAZELHILL BALLYHAUNIS CO. MAYO -REG No. P0048-02.

I refer to the notification as received on the 6th January 2007 of a proposed determination of a review of an integrated pollution licence in accordance with Section 87(2) of the Environmental Protection Agency Acts 1992 and 2003. The Board is concerned that apart from total phosphorus, there is little change in the emission limit values between the conditions imposed in the Integrated Pollution licence as issued on the 1st August 1997 and the proposed determination on the application for a review as circulated to this Board on the 5th January 2007.

Table 1 Comparison of volume limits and emission limit values, 1997 and 2007.

Parameter	1997	2007
pH	6 to 9	6 to 9
Toxicity	5	20
BOD, mg/l	20	20
COD, mg/l	50	50
Suspended Solids, mg/l	25	25
Total Nitrogen, mg/l	15	15
Ammonia (as N)	10	10
Total Phosphorus (as mg/l P)	3	2
Orthophosphate (as mg/l P)	1	1
Oils Fats and Grease, mg/l		15
Volume to be emitted:		
Volume/day(Max,m ³)	1250	1250
Volume/hour (Max,m ³)	55	55

Because of the fact that the discharge enters the headwaters of a salmonid river within the Corrib catchment, the Fishery Board had asked the EPA to implement conditions that would give rise to progressive reductions in the pollution load over a period. While the reduction in total phosphorus is a welcome development, the Board submits that the review of the licence could have gone further as the review provided an ideal opportunity to make more significant reductions in the organic, solids and nutrient load entering the Dalgan River. Please find prescribed fee in accordance with the regulations.

Yours sincerely,


Greg Forde,
Acting Chief Executive Officer

EPA

MAIN FILE ☒
PUBLIC FILE ☒
EVALUATION FILE ☐
DATE 19/01/07 OR



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