

Fingal County Council Comhairle Contae Fhine Gall



Ms. Noeleen Roche,
Office of Licensing & Guidance,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



13 February 2007

Re: Licence review – Kepak, Clonee, County Meath.

Dear Madame,

In response to your letter dated 11 January 2007 regarding the licence review of the Kepak facility in Clonee, Co. Meath, Fingal, County Council would like to submit the following points for consideration.

A review of sampling results 2005 & 2006 highlighted the following. Over this two year period, a 24 hour composite sample as dictated by the monitoring schedule was unattainable from the Kepak premises. With no alternative Grab samples had to be taken. The problem was reported but continued until July 2006. Failure to supply composite samples for an 18 month period constitutes a non-compliance with the existing Fingal County Council consent to discharge to sewer.

The existing IPC licence lists only 3 emission limit values for Kepak effluent grab samples – BOD (3,000 mg/l), COD (6,000 mg/l) and SS (1,500 mg/l). Therefore compliance of these samples can only be assessed against these parameters. In summary, 10 grab samples were received in 2005 and 6 grab sample samples and 5 composite samples were received in 2006.

Non compliances for grab samples are highlighted in the attached table. These show non compliances with BOD, COD and SS on 15/06/2005, SS on 21/12/2005, COD and SS on 29/03/2006 and COD and SS on 16/06/06. These represent four dates of the 21 sampled.

Water Services Department

Postal Address

P.O. Box 174,
County Hall,
Swords,
Fingal,
Co. Dublin

An Roinn Seirbhíse Uisce

Bosca 174,
Áras an Chontae,
Sord,
Fine Gall,
Contae Átha Cliath

Office Address

Grove Road,
Blanchardstown,
Fingal,
Dublin 15

Telephone

01 890 5970

Facsimile

01 890 5919

Email

waterservices@fingalcoco.ie

www.fingalcoco.ie

*Water is precious. Let's conserve it.
Tá uisce luachmhar. Caomhnaímís é.*



Fingal County Council Comhairle Contae Fhine Gall



Fingal would like to highlight the above exceedences in response to comments made in section D.3 of Kepak's submitted licence review application:

The treated effluent in 2005 has been within limit for all parameters, with the exception of BOD which exceeded the limit in November 2005.

If you would like any additional information on this matter do not hesitate to contact David Devine on 8906776 or by email at:
david.devine@fingalcoco.ie.

Yours Faithfully,

David Devine
A/Senior Executive Engineer
Water Pollution Control

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



/Sample Type:	Effluents :	Food Industry							
/									
Sample Source :	Kepak	Clonee							
/									
/									
/ Received	Sample	pH	Cond 20	Cl Ind	SO4 Ind	BOD_ATU	COD	OGF	Susp_Sols
/									
IPC Consent limit						3,000 mg/l	6,000 mg/l		1,500 mg/l
/*25/01/2005	485267	6.9	5750	22	32		2560		776
/*23/02/2005	488496	6.9	5480	702	6	828	1666	16	740
/*08/04/2005	492946	6.7	5570	11	2	2180	4347	97	760
/*11/05/2005	496303	6.6	4320	57	25	2260	4197	93	1304
/ 15/06/2005	500310	6.3	7430			> 6232	23389	2320	10840
/*27/07/2005	504384	7.9	703				185	3	66
/*24/08/2005	507196	7	6120			1124	2081	36	504
/*24/10/2005	512894	7.1	3740		30		2253	80	785
/*07/12/2005	517486	6.6	4640	1155	14	1508	2149	40	490
/*21/12/2005	519010	6.4	5200	1181	51		4781	92	1990
/*11/01/2006	520167	6.7	4320	1033	19	1420	1826	52	1044
/*15/02/2006	523955	7.4	1250	95	49	386	1143	8	55
/*29/03/2006	528313	6.5	6070			1556	6593	42	2875
/*25/04/2006	530802	6.7	6570				450		1010
/*24/05/2006	533853	6.4	4430	928	15	> 1604	3600	144	1440
/*13/06/2006	535650	6.7	6980	1010 <	5		13209	1140	6936
/*12/07/2006	538524	6.8	6610	1626	16		1842	0	292
/*16/08/2006	542059	6.8	5380	5	5		2515	16	526
/*26/10/2006	548575	6.6	5510	1655 <	5	> 390	1400	4	66
/*29/11/2006	551563	6.9	5540	1137	42	998	1539	16	98
/*13/12/2006	552927	6.9	5170	1050	37	706	1116	4	126