

Sub No. 12

Noeleen Roche**Subject:** FW: DAIRYGOLD IPPC 404-02**Attachments:** Blank Bkgrd.gif**From:** kfinn [mailto:kfinn@esatclear.ie]**Sent:** 26 February 2007 03:38**To:** Wexford Receptionist**Cc:** Sean O'Donoghue; kfinn**Subject:** Re: DAIRYGOLD IPPC 404-02**Re: DAIRYGOLD IPPC 404-02**

25th February 2007.

Dear Sirs

I refer to Dairygold submissions dated 1st February 2007 and 16 February 2006 (presumably should be 2007) and have the following initial observations/submission:

1. It is not acceptable that Dairygold should submit information of the nature submitted itself by way of simple letter, as it is not technically or corporately competent to verify the veracity of the information submitted itself. The information should be prepared and certified by independent consultants expert in their respective fields and the certified information should then be submitted under a cover letter from Dairygold.

2. Dairygold refer to the fact that it has commissioned independent consultants (specialists) to advise them on the most appropriate options for the site taking all aspects into consideration. Yet they have failed to submit any report from these independent consultants certifying the options and recommendations and more importantly the expected outcomes of any proposed upgrading and/or increase in production.

Dairygold should be requested to submit a certified copy of any and all such reports from their independent consultants dealing fully with the issues of noise, odour, and all other air emissions, as part of this application. I would ask the EPA to do so now.

3. In no part of their submission is it certified independently or otherwise that:

- a. The proposed works will result in full compliance with noise volume limits under all operating conditions and all weather conditions.
- b. The proposed works will result in full compliance with noise quality (tonal) limits under all operating conditions and all weather conditions.
- c. The proposed works will result in full compliance with odour limits under all operating conditions and all weather conditions.

Dairygold should be requested to submit such certification as part of this application. I would ask the EPA to do so now.

4. It is inconceivable that Dairygold be granted an IPPC licence to increase throughput/output in a situation where:

- a. The most recent annual noise survey and ongoing odour survey indicates clear breaches of its IPPC licence limits even under favourable weather conditions and prepared operating conditions.
- b. It has not demonstrated full compliance with Noise and/or odour limits in the interim.
- c. There are ongoing complaints and breaches of its existing licence in re noise and odour limits and conditions.

and without demonstrating or furnishing independent certification that compliance can and will be achieved for the proposed increase in production, making due allowance for accidental shock loadings, and including a +25% stress test over normal/expected peak loading, PRIOR to any such increase taking place.

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5. Any proposed licence should include provision for an immediate substantial financial and production cutback penalty in re any breach of noise and/or odour emission conditions, in order to encourage effective self monitoring, supervision, management, and compliance with the licence conditions/limits, BEFORE the occurrence of complaints from members of the public.

6. In any proposed licence, the limit values in re noise and odour emissions should apply at the boundary of the site(s) and at selected 'sensitive locations' in proximate residential and/or public areas.

7. In re Noise:

The limits should apply at the boundary of the site(s).

The volume limits should be reduced to a 40/50 dBA night/day standard with 5 dBA penalty in re any tonal noise.

The quality (tonal) limit condition should be reduced to "audible" instead of "clearly audible" tonal content.

Where there are persistent/repeat complaints the conditions should require DG to carry out a mini Noise Survey and post the full measurements and analysis/results within 24 hrs to the EPA and place on the public file.

The Annual Noise survey should be increased to a quarterly survey until there is at least two full production seasons with full compliance. In this I note that DG intend increasing production to 365/12 year round instead of hitherto 8 months (mid March to mid Nov).

The Annual survey should be split into two, one for the Castlefarm Plant and one for the Clonmel Road Plant. In re the Castlefarm Plant the measurements should be taken in a moderate wind from a NW direction +/- 20%. In re the Clonmel Road Plant the measurements should be taken in a moderate wind from an E direction +/- 45%.

The full of all noise measurements and noise survey reports should be placed on the public file at the same time as submitting to the EPA.

The annual report should include a summary of the results of Noise measurements, reports, monitoring and complaints during the year and should fairly reflect the factual conditions experienced during the year and not the fairy make-believe world that DG seem to live in.

8. In re Odour:

The limits should apply at the boundary of the site(s).

There should be no odour detectable at the boundary.

Refer above under Noise in re the annual report.

Please acknowledge receipt.

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