



office . obj ②  
**CAVAN COUNTY COUNCIL**

Comhairle Chontae an Chabháin

Telephone: (049) 433 1799/436 1799

Fax: (049) 436 1565

Courthouse

Teach Na Cúirte

Correspondence should be addressed to:  
CENTRAL ADMINISTRATION DEPARTMENT

Cavan

An Caobhán

Our Ref.: OH/PC

09 November 2007

**Registered Post**

Marie Harris,  
Office of Climate, Licensing and Resource Use,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

**Environment  
Protection Agency**

**12 NOV .**

**Re: IPPC Licence Reg No P800-01 (Lakeland Dairies, Killeshandra, Co. Cavan)**

Dear Ms. Harris,

Our letter dated 1<sup>st</sup> November, 2007 in relation to the above IPPC licence refers.

Please now find enclosed a cheque in the amount of €63 made payable to the EPA, being the required objection fee.

Any correspondence in relation to this matter should be forwarded to;

**The Environment Section**

**Cavan County Council**

**17, Farnham Street,**

**Cavan,**

**Co. Cavan**

**Or Telephone 049 - 4378486**

Yours sincerely,

**Peter Cork,  
Senior Engineer,  
Environment Section**



# CAVAN COUNTY COUNCIL

Comhairle Chontae an Chabháin

Telephone: (049) 433 1799/436 1799

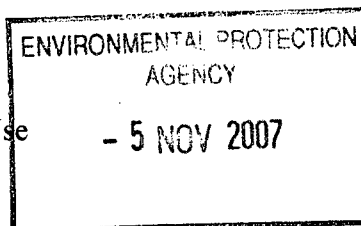
Fax: (049) 436 1565

Courthouse  
Teach Na Cúirte

Correspondence should be addressed to:  
CENTRAL ADMINISTRATION DEPARTMENT

Cavan  
An Caobhán

Marie Harris  
Office of Climate, Licensing and Resource Use  
Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford



01/11/07

**Re: Licence Reg No P0800-01 (Lakeland Dairies, Killeshandra Co. Cavan)**

Dear Ms. Harris,

I refer to the above referenced letter and wish to make the following comments.

The treated effluent from this facility discharges to the Cullies River which generally has ortho-phosphate levels varying from approx 10 to 200 ug/l based on monitoring by Cavan County Council. The contribution of Lakeland Dairies to these levels is unknown however it is clear that there is a problem with phosphorus levels in this river. Close attention needs to be paid to the phosphorus concentration in discharges from Lakeland Dairies.

Lakeland Dairies is currently licensed by Cavan County Council to discharge to waters (licence SS/W006/03) The limit specified for Total Phosphorus is 1 mg/l. In the last 3 years, the licensee has been relatively compliant with this limit, median result in this period has been 1.007 mg/l. Therefore it is recommended that the proposed limit of 2 mg/l be reduced to 1 mg/l

Section C.2.3 of the proposed IPPC licence specifies parameters and monitoring frequencies for Storm Water emissions However, apart from a temperature limit of 25 degrees C (stated in section 5.4) there do not appear to be any limit values associated with these storm water emissions. The limit values in section B.1 appear to refer to the treated process effluent only. Cavan County Council's discharge licence SS/W006/03 specifies limits for both process effluent and non process effluent. The latter were included in the licence due to problems with contaminated surface water runoff from the facility and specific limits on contaminants with requisite monitoring need to be included in the IPPC licence.

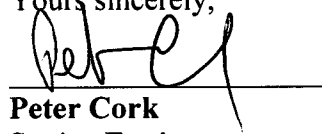
It is noted that in section 6.13.3 that SW 1, 2 and 3 will have discharges of reverse osmosis permeate etc., however in section C.2.3 these discharges are referred to as "storm water". In the glossary, storm water is defined as "rain water run-off from roof

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

and non-process areas". It is suggested that instead of referring to "storm water" that the licence refer to "non process water" and that it be made clear exactly what this includes.

For information, please find attached a copy of licence SS/W006/03.

Yours sincerely,



**Peter Cork**  
**Senior Engineer**  
**Environment Section**

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

# CAVAN COUNTY COUNCIL

## Local Government (Water Pollution) Acts, 1977 & 1990 Licence to Discharge Trade or Sewage Effluent to Waters

LICENCE NUMBER: SS/W006/03

To: Lakeland Dairies,  
Killeshandra,  
Co. Cavan.

The Cavan County Council, in exercise of the powers conferred on it by the Local Government (Water Pollution) Act, 1977 and 1990, hereby grants a revised licence to discharge trade and sewage effluent from the treatment works located at Cornaclea to a river connecting Town Lake and Tullyguide Lake, Cornaclea and from their premises located at Killeshandra to Town Lake at Killeshandra, as outlined in plans and particulars submitted, subject to the conditions set out below.

Dated this 14<sup>th</sup> day of January 2004

\_\_\_\_\_  
Senior Engineer  
Order No. ENV 009

### SCHEDULE

#### **Emissions of Trade Wastewater**

1. No untreated effluent shall discharge directly to the receiving waters. All such effluents shall pass through the on-site wastewater treatment plant and through a single outfall to waters.
2. No treated wastewater emission shall exceed the emission limit values set out in schedule 1.1. There shall be no other emission to waters of environmental significance.
3. Fats, oils and grease shall not be present in quantities such as to: -
  - a) Form visible films on the surface of receiving waters;
  - b) Form coatings on the bed of the receiving waters;
  - c) Cause deleterious effects on aquatic life, and
  - d) Impart a detectable taste or odour to edible aquatic species.
4. No substance shall be discharged in a manner or at a concentration which, following initial dilution, causes tainting of fish.
5. In the event that the flow in the Cullies river is less than 0.24 m<sup>3</sup>/s and/or a breakdown or malfunction of the treatment works occurs, giving rise to a treated effluent which exceeds its Emission Limit Values, the effluent is to be spray irrigated on the Lakeland Dairies farm at Cornaclea in accordance with schedule 1.5 of the licence.

.....Contd.

6. The licensee shall undertake a sampling and analysis programme of the discharge from the wastewater treatment plant. The frequency of sampling and analysis is set out in Schedule 1.2.
7. The licensee shall forward the results of all monitoring undertaken in compliance with the requirements of this licence to Cavan County Council on a quarterly basis.
8. The licensee shall notify Cavan County Council by both telephone and facsimile, if available, within 24 hours and by registered letter within four working days after the occurrence of any of the following:
  - 8.1 Any emission which does not comply with the requirements of this licence,
  - 8.2 Any malfunction or breakdown of control equipment or monitoring equipment which is likely to lead to loss of control of the wastewater treatment plant,
  - 8.3 Any incident with the potential for environmental contamination of surface water or groundwater, or posing an environmental threat, or requiring an emergency response by the Local Authority,
  - 8.4 The licensee shall include as part of the notification, date and time of the incident, details of the occurrence, and the steps taken to minimise the emissions and avoid recurrence as well as details of the circumstances giving rise to the incident and all actions taken to minimise the effect on the environment and minimise wastes generated.
9. A logbook shall be maintained, noting all transactions as specified in this licence associated with the wastewater treatment plant and any other details as may be required by Cavan County Council.
10. A visual examination of the receiving river for a distance of 100 metres downstream shall be carried out weekly. All inspection findings shall be recorded in the logbook.
11. The Licensee shall within one month of the issuing of this licence forward the name of a competent person to be responsible for the daily maintenance and orderly running of the wastewater treatment plant, including desludging as required.
12. The Licensee shall within one month of the issuing of this licence submit details regarding the routine servicing and maintenance of the wastewater treatment plant. This should include the frequency of the work, the name of the person and/or company carrying out the work. A record of all service and maintenance shall be maintained in the logbook.
13. The Licensee shall within one month of the issuing of this licence submit details of all chemicals used in the wastewater treatment process. This is to include dosing rates and names of chemical used. A record of such details shall be maintained in the logbook.
14. The licensee shall provide and maintain a suitable sampling location and ensure that direct access to the sampling point is available at all reasonable times to personnel authorised by Cavan County Council.

.....Contd.



15. The Licensee shall forward within two months of the issuing of licence and yearly thereafter, details on the use of any dangerous substances as categorised under the Water Quality (Dangerous Substances) Regulations 2001. These details shall include the compounds they occur in and the quantities used and shall include substances that are either used in any process or utilised in any servicing or maintenance.
16. All sludges generated at the wastewater treatment plant shall be disposed of taking cognisance the Waste Management Act of 1996. A sludge waste register shall be maintained on site and shall be available for inspection by authorised personnel of Cavan County Council at all reasonable times. This register shall include details of the following:
  - 16.1 For sludges removed and spread on lands not owned by Lakeland Dairies,
    - 16.1.1 Date, volumes removed and name of waste contractor involved.
    - 16.1.2 Address of ultimate destination of waste.
    - 16.1.3 Results of analysis as per Schedule 1.3.
  - 16.2 For Sludges removed and spread on lands owned by Lakeland Dairies
    - 16.2.1 Date and volumes removed.
    - 16.2.2 Results of analysis as per Schedule 1.3.
    - 16.2.3 Weather conditions at the time and weather forecast for subsequent 48 hours.
    - 16.2.4 Volumes of organic waste applied to individual fields/plots
- 17 All landspreading of sludge wastes and effluents on Lakeland Dairies lands shall be undertaken in accordance with a Nutrient Management Plan, to be submitted within four months of date of grant of this licence and which must be agreed in advance with Cavan County Council.
- 18 All landspreading activities on the Lakeland Dairies lands shall be carried out in such a manner as to avoid contamination of surface waters and groundwaters.
- 19 Monitoring of the soil at the Lakeland Dairies lands utilised for the landspreading of sludge wastes and effluents shall be in accordance with Schedule 1.4.
- 20 Landspreading of sludge wastes and effluents on the Lakeland Dairies lands shall be carried out in accordance with Schedule 1.5 of this licence.
- 21 The licensee shall notify Cavan Council of any proposed changes in the operation of the premises and/or wastewater treatment plant likely to cause an alteration in the volume and/or composition of the effluent and sludge waste being generated.

### **Emissions of Non-Process Waters**

1. A visual examination of the Non-Process water discharges shall be carried out weekly or more frequently as required. All inspection findings shall be recorded in the logbook.
2. The Licensee shall within one month of the issuing of this licence forward the name of a competent person to be responsible for the daily inspections.
3. No Non-Process water emission shall exceed the emission limit values set out in schedule 1.6. There shall be no other emission to waters of environmental significance.

.....Contd.

4. The licensee shall undertake a sampling and analysis programme of the Non-Process water discharges. The frequency of sampling and analysis is set out in Schedule 1.7.
5. The licensee shall forward the results of all monitoring undertaken in compliance with the requirements of this licence to Cavan County Council on a quarterly basis.
6. The licensee shall notify Cavan County Council by both telephone and facsimile, if available, within 24 hours and by registered letter within four working days after the occurrence of any of the following:
  - 6.1 Any release to the surface water system of any contaminating materials,
  - 6.2 Any emission which does not comply with the requirements of this licence,
  - 6.3 Any malfunction or breakdown of control equipment or monitoring equipment which is likely to lead to contamination of the non-process waters,
  - 6.4 Any incident with the potential for environmental contamination of surface water or groundwater, or posing an environmental threat, or requiring an emergency response by the Local Authority,
  - 6.5 The licensee shall include as part of the notification, date and time of the incident, details of the occurrence, and the steps taken to minimise the emissions and avoid recurrence as well as details of the circumstances giving rise to the incident and all actions taken to minimise the effect on the environment and minimise wastes.

### **Provision of Monitoring Equipment**

1. The Licensee shall provide safe and permanent access to the following sampling and monitoring points:
  - 1.1 Final effluent as discharged from the wastewater treatment plant.
  - 1.2 Non process water points SW1, SW2 and SW3 as marked on site plan submitted by Lakeland Dairies.
2. The Licensee shall install on all emission points, automatic sampling equipment capable of 24 hour, flow proportional, composite sample collection and equipment capable of continuous flow recording.

### **Financial Provisions**

1. The licensee shall pay to Cavan County Council an annual contribution of €2,320 towards monitoring costs incurred by the Council in the performance of its functions under the Local Government (Water Pollution) Acts 1977 and 1990. The initial payment shall be made within three months of the grant of this licence. The licensee shall in subsequent years pay to the Council this amount updated in accordance with changes in the Consumer Price Index. The licensee shall fund any additional monitoring costs incurred by the council.

**NOTE** An appeal in relation to this licence may be made to An Bord Pleanala, 64, Marlborough Street, Dublin 1, within one month of the date of grant of licence. Any appeal made to An Bord Pleanala will be invalid unless a fee of €126.00 is received by the Board within the statutory appeal period. Submissions or observations made to the Board by or on behalf of a person (other than the applicant) as regards an appeal made by another person must be accompanied by a fee of €38.00.

.....Contd.



### Schedule 1.4 Monitoring of Lands used for Landspreading of Sludges and Spray Irrigation of Treated Effluent in Emergency Situations.

Conditions	Monitoring Frequency	Technique
Where no soil test available	Within 12 months of date of grant of licence	Morgan's P test
Where soil test <10mg P/litre	Every two years	Morgan's P test
Where soil test >10mg P/litre	Annually	Morgan's P test

### Schedule 1.5 Buffer Zones for Landspreading

No sludges or treated wastewaters shall be spread within the following buffer zones:

Area	Buffer Zone (m)
Sensitive buildings (hospitals, schools and churches)	200
Dwelling houses	100
Karst features	30
Lakes and main river channels	20
Small watercourses	10
Public Roads	10
Domestic wells	50
Public supply well	300

.....Contd.

## Schedule 1.1 Emissions of Trade Wastewater Emission Limit Values

<i>Parameter</i>	<i>Emission Limit Value</i>
Maximum Daily Discharge	1500 m <sup>3</sup> in any one day.
Maximum Hourly Discharge	125 m <sup>3</sup> in any one hour

<i>Parameter</i>	<i>Emission Limit Value</i>
BOD	20 mg/l O <sub>2</sub>
Suspended Solids	30 mg/l
pH	6 - 9
Total Phosphorus as P	1 mg/l P
Ammonia as N	5 mg/l N
Oxidised Nitrogen as N	15 mg/l N
(All analysis to be carried out as per Standard Methods)	

## Schedule 1.2 Emissions of Trade Wastewater Monitoring Schedule

<i>Frequency</i>
- Samples shall be taken weekly
- Samples shall be composed of a 24 hr composite flow proportional sample

## Schedule 1.3 Sludge Waste Analysis

<i>Analysis and Frequency</i>
Sludge samples are to be taken and analysed monthly for the Following;
% Dry Matter, Total N, Total P and Total K.

## Schedule 1.6 Emissions of Non-Process Waters Emission Limit Values

Parameter	Emission Limit Value
Maximum Daily Discharge	2500 m <sup>3</sup> in any one day.
Maximum Hourly Discharge	210 m <sup>3</sup> in any one hour

Parameter	Emission Limit Value
BOD	3 mg/l O <sub>2</sub>
Suspended Solids	25 mg/l
pH	6 - 9
Temperature	Not exceeding 25 °C
Total Phosphorus as P	0.1 mg/l P
Ammonia as N	3 mg/l N
Oxidised Nitrogen as N	5 mg/l N
(All analysis to be carried out as per Standard Methods)	

## Schedule 1.7 Emissions of Non-Process Waters Monitoring Schedule

Frequency
<ul style="list-style-type: none"> <li>- Samples shall be composed of a 24 hr composite flow proportional sample</li> <li>- Samples shall be taken weekly during the first year</li> <li>- Samples shall be taken monthly in subsequent years, if it can be shown that the discharge during the first year complies with the provisions of this licence</li> <li>- If two or more of the 12 monthly samples fails, samples must be taken weekly in the year that follows</li> </ul>

.....Contd.

### *Glossary of Terms*

The Licensee	Lakeland Dairies, Killeshandra, Co. Cavan
Annually	All or part of a period of twelve consecutive months
Biannually	All or part of a period of six consecutive months
BOD	5 day Biochemical Oxygen Demand
Daily	During all days of plant operation, and in the case of emissions, when emissions are taking place; with no more than 1 measurement on any one day
Day	Any 24 hour period
DO	Dissolved Oxygen.
Local Authority	Cavan County Council
Monthly	At least 12 times per year at approximately 30 day intervals.
Quarterly	All or part of a period of three consecutive months, beginning on the first day of January, April, July or October
Standard Methods	As detailed in "Standard Methods for the Examination of Water and Wastewater", (prepared and published jointly by A.P.H.A., A.W.W.A & W.E.F) 20th Ed. 1998, American Public Health Association, 1015 Fifteenth Street, N.W., Washington DC 20005, USA
Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place; with no more than one measurement in any one week