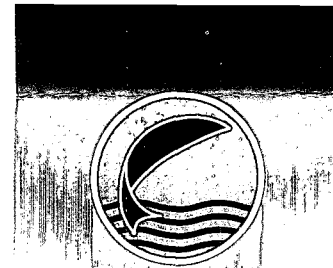


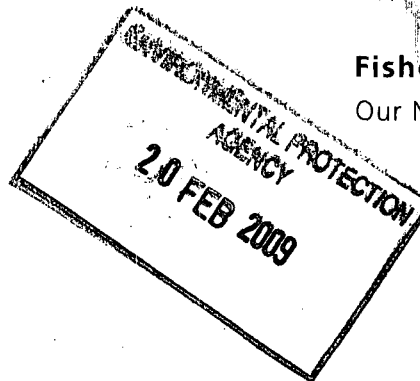


Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland
Our Natural Heritage



Office of Climate, Licensing & Resource Use
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
County Wexford

13 February 2009

Dear Sir

Section 4 Discharge License by Ballon Meats Ltd at Raheen, Ballon, Co. Carlow

Dear Sir,

With reference to the further information supplied regarding the IPPC License Application by Ballon Meats Ltd. the following are the concerns of the Board.

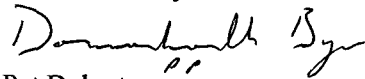
- It is our understanding that the current practice of discharging clean uncontaminated rain water run-off from 8450m² of yard and roof space will not be permitted under this IPPC License. The Board have serious concerns that there is insufficient hydraulic capacity in surface water drains / pipes on site to convey these significant quantities of water to surface waters. The Board also have concerns relating to bank erosion in the receiving watercourse and we request that attenuation of these surface water discharges is addressed.
- The Board request that this IPPC License addresses discharges of uncontaminated surface / rain water from lands surrounding the ICW ponds and that measures are taken to prevent these waters from entering the ICW pond system.
- The serious pollution of the receiving watercourse immediately downstream of the storm-water drain (which appears to run underneath / between ICW ponds 1 & 2) noted by Fisheries Board staff has not been addressed. No biological assessment of the receiving watercourse has been undertaken, such an assessment would provide an indication of long term water quality status, and address the Q1 (seriously polluted) conditions noted by Fisheries Board staff a short distance downstream from the plant.
- The surface water drain mentioned above flows beneath the willow plantation area. The Board have serious concerns that the irrigation of the willow plantation poses a serious threat of contamination of this surface water drain (we request that this be addressed). We note that the applicant now proposes to spread the effluent using a vacuum tanker and have serious concerns that this can be done and achieve a controlled and even spread over the willow plantation area.

The Eastern Regional
Fisheries Board
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- The Board request that the Paunch Storage be moved to a covered site and that any run-off from this be directed to the secondary waste water treatment facility (including P removal to maximum 2ppm) prior to discharge to the ICW system.
- We note that the out-Wintering pad was constructed in 2005 prior to the Department of Agriculture Guidelines which were released in February 2007. The Board has serious concerns with the statement that the out wintering pad is in **General Compliance** with the Department Guidelines. The Board have noted very poor quality discharges from ICWs used to "treat" run-off from out-Wintering Pads in farm inspections. Given the above statement by the applicant it is our understanding the out-wintering pad is not fully compliant with the Dept. of Agriculture Guidelines and we request that the run-off from this site be directed to the secondary waste water treatment facility (including P removal to maximum 2ppm) prior to discharge to the ICW system.
- The watercourse with a catchment area of approx. 0.25km² which adjoins this site represents the extreme upper reaches of the Douglas River is an important salmonid system with very good populations of trout & salmon. Given the limited flows in this watercourse it is unlikely that assimilative capacity exists in this watercourse for any discharges of effluent and it is imperative that there are no discharges from the site through contributions from contaminated groundwater or from infiltration of effluent into land / surface water drains.

Yours faithfully



Pat Doherty
Chief Executive Officer

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