

Our Ref: sw/e100/mmp/100

Environmental Protection Agency
Regional Inspectorate
Inniscarra
Co. Cork

09 November 2011

**RE: Carbery Milk Products, Ballineen, Co. Cork
P0390-03 & P390-04 – Licence Review.**

A chara,

I refer to your recent correspondence informing IFI that a review of the IPC for the Carbery Milk Products(CMP), Ballineen facility is currently taking place.

The Bandon River is one of the premier salmonid spawning, nursery and angling waters in the South West of Ireland and it is in this context that IFI makes the following comments. IFI has a number of concerns in relation to the current application as detailed below.

IFI has received a number of complaints in recent years regarding an accumulation of sediment on the river bed and or the presence of sewage fungus downstream of CMP outfall SW1. On each occasion these complaints have been notified to the EPA by IFI. When checked on the ground by IFI staff these reports were found to be accurate.

In the current application CMP acknowledges that the assimilative capacity of the Bandon River is believed to be negligible. CMP states that it has calculated emission limits using a notional clean river approach and mean flows. However these notional values selected for parameters such as BOD and ortho-phosphate do not remotely reflect the reality of the current water quality in the river. Neither does the use of mean flows reflect the times at which water quality is under most pressure i.e. the 95%ile flows and lower. It is the opinion of IFI that the continued use of this idealistic approach to calculate the assimilative capacity of the river will result in a continuance of the aquatic habitat difficulties exemplified by the above referred to complaints.

In relation to receiving water flows the CMP application suggests that the 95%ile flow in the receiving water is 0.379m³/s (32745m³/day). CMP is applying for a maximum daily discharge of 6000m³/day, a dilution factor of just over 1 in 5 at 95%flows and even less at flows approaching dwf. The maximum discharge permitted under CMP's current licence is 4000m³/d. IFI does not consider a discharge volume increase such as that proposed to be compatible with the maintenance and improvement of water quality in the Bandon River.

In relation to the cooling water discharge it came to the attention of IFI during the summer of 2011 when investigating a fish kill in the area, that there were no monitoring records maintained in respect of this discharge with the exception of pH. IFI would a continuous monitoring regime be put in place for this discharge which could detect any extraneous matter entering the cooling waters. In relation to temperature monitoring IFI would ask that a daily monitoring regime occur to measure the impact of both the cooling water and treatment plant outfalls on downstream waters relative to upstream levels.

IFI would ask to be informed when a determination is made in relation to this review

Yours sincerely,



Michael McPartland
Environmental Officer.

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