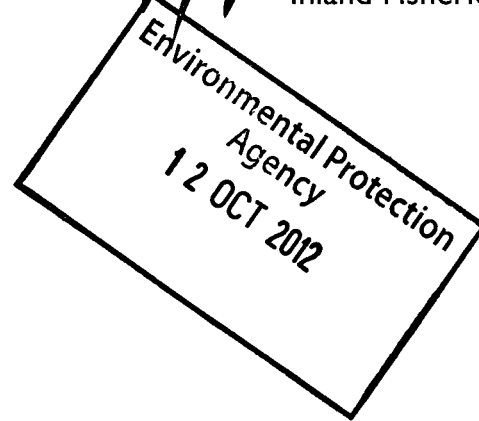


Sub ① .



Iascach Intíre Éireann
Inland Fisheries Ireland

Ms. Ann Kehoe,
Programme Officer,
Office of Climate, Licencing & Resource Use,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
County Wexford.



11th October 2012

Re: Waste Licence Application
Applicant: Ormonde Organics Limited, Killowen, Portlaw, Co. Waterford.
Application Ref: W0287-01

Dear Sir/Madam,

While Inland Fisheries Ireland (IFI) is not in principle opposed to the granting of the licence, we do wish to make the following observations on the application as submitted to the Agency:

Storage of Digestate.

Section 8.3 of the EIS on Wastewater states "The AD process will not generate a wastewater that requires treatment on-site. The liquid digestate produced in the process will be stored in the converted wastewater treatment tanks, which will provide a minimum three months storage, and then sent from the site and applied to agricultural lands. Any run-off from the silage storage area will be collected and treated in the AD plant. The European Communities (Good Agricultural Practice For Protection Of Waters) Regulations 2010 (S.I. No. 610 of 2010) specifies storage periods for livestock manure as 16 weeks in relation to holdings in counties Carlow, Cork, Dublin, Kildare, Kilkenny, Laois, Offaly, Tipperary, **Waterford**, Wexford and Wicklow. IFI would expect that similar minimum periods/requirements should be applied to the storage of digestate. Indeed, these minimum periods may be insufficient when one considers the poor climatic conditions/increased rainfall experienced in Ireland during recent summers when one would expect to landspread such material. It is our view that the three months (presumably 13 weeks) storage capacity proposed is insufficient.

Discharge of polluting matter such as silt and fuel oils during the construction phase of the development.

The discharge of silt-laden waters to receiving waters due to insufficient silt control measures can negatively impact on the receiving environment leading to loss or degradation of valuable habitat. It is important to incorporate best practices and strategies to minimise discharges of silt/suspended solids to waters. Silt traps if appropriate should be constructed at locations that will intercept run-off from the site.

Fuel oils etc. should be stored on a sheltered dry elevated site well removed from aquatic zones. It is our view that refueling of vehicles should take place in a designated area well away from aquatic zones and fuel oils must not, under any circumstances, discharge into an aquatic zone.

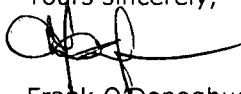
Site drainage.

In terms of site drainage IFI recommends that sustainable urban drainage systems (SUDS) be employed to mimic water flow patterns as exist in greenfield runoff, and provide treatment systems which ensure no deterioration in water quality as a result of site runoff.

Fire fighting and containment & treatment of effluents potentially generated by fire fighting activities.

IFI recommends that the Agency should be entirely satisfied with the access to and adequacy of water supply in the event of a fire, and the adequacy of facilities for containment of effluents that would result from fire fighting activities.

Yours sincerely,



Frank O'Donoghue,
Senior Fisheries Environmental Officer

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