



Comhairle Chontae Dhún na nGall

Donegal County Council

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Ms Máire Buckley
Environmental Licensing Programme
Office of Climate, Licensing & Resource Use

Re Reg No: P0416- 03 United Fish Industries
19/11/2012

A Chara

I refer to your letter of the 24/10/2012 relating to the objection by the applicant to their proposed licensing conditions on emissions to sewer and wish to make the following observations on the conditions involved.

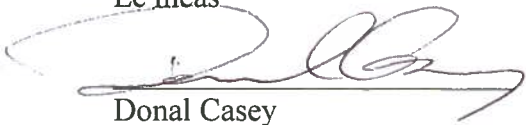
22 Schedule C.3.2 (sewer)

The main parameter of concern is terms of toxicity here is Ammonia which is monitored. The discharge is to sewer which is discharged under a WWDL licence to waters and has provision for toxicity testing. It would appear to be unnecessary to set down a requirement for this test given the ammonia levels, which can be easily measured, is the parameter leading to toxicity. Toxicity testing is an expensive test and in this case is unlikely to provide additional information that is of value in relation to the discharge in question.

23 Schedule C.3.2. (sewer)

Monitoring for complex organic compounds on a biannual basis would appear to be excessive given the Fishmeal manufacturing processing involved which does not involve the use of such substances. It is recommended that this parameter is measured once within 6 months of the licence being issued and then provided no concerns are raised by this analysis that no further tests are required unless a process change within the plant warrants a review of this condition.

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Donal Casey
Senior Executive Chemist
Donegal County Council