



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

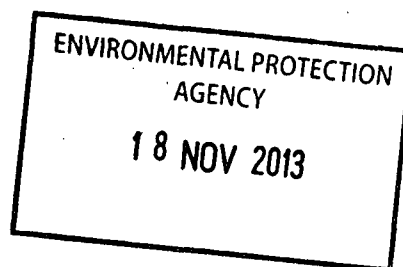
Submission No. 1  
Environmental Health Service,  
HSE Dublin/North East,  
Cavan and Monaghan,  
18 The Grange,  
Plantation Walk,  
Monaghan.

Tel No: +353 (0) 47-30906  
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Ref/ IMcC/CO'D

30<sup>th</sup> October, 2013

Ms Noeleen Keavey,  
Environmental Licensing Programme,  
Office of Climate, Licencing & Resource Use,  
Environmental Protection Agency Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
Co Wexford.



**Re: Application for Integrated Pollution Prevention and Control License review.**

**Class and Nature of Activity: Class 7.2.1**

**The treatment and processing of milk, the quantity of milk received being greater than 200 tonnes per day (average value on a yearly basis).**

**Applicant: Baileboro Foods Limited, Lear, Baileborough, Co. Cavan.**

**Ref. No: PO406-04**

**EHIS Ref: 0062**

Dear M<sup>s</sup> Keavey,

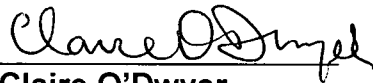
Please find enclosed the Health Service Executive consultation report in relation to the above application.

If you have any queries regarding the report, the initial contact is Ms. Claire O'Dwyer, Acting Principal Environmental Health Officer.

The Environmental Health service response to the application is in the attached consultation report. The report was compiled based on the following:

- A site visit.
- An assessment of documentation submitted to this office.
- EPA guidance documents.
- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the Health Service Executive.

Yours sincerely,



**Claire O'Dwyer**  
**A/Principal Environmental Health Officer**

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30<sup>th</sup> October, 2013

Ms. Claire O'Dwyer,  
A/Principal Environmental Health Officer,  
Environmental Health Office,  
The Arcade,  
Main Street,  
Cavan.

**Re: Application for Integrated Pollution Prevention and Control License review.**

**Class and Nature of Activity: Class 7.2.1**

**The treatment and processing of milk, the quantity of milk received being greater than 200 tonnes per day (average value on a yearly basis).**

**Applicant: Baileboro Foods Limited, Lear, Baileborough, Co. Cavan.**

**Ref. No: PO406-04**

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Dear Claire,

I refer to the recent submission of an application for an IPPCL review from Baileboro Foods Ltd. The following are observations and comments made whilst reviewing the said application and related documents in conjunction with EPA guidance documents and associated legislation and discussions with personnel during the Baileboro Foods Ltd site visit on the 30<sup>th</sup> October 2013.

#### **Wastewater**

Milk volumes within the dairy catchment serviced by Baileboro Foods plant are projected to increase significantly in the next 3-5 years. This is largely due to the ending of the current milk quota scheme in 2015. It is proposed to increase the daily wastewater discharge from 2100m<sup>3</sup> to 2750m<sup>3</sup> in order to facilitate additional wastewater arising through processing additional milk volumes at the Baileboro site and to avoid the transportation of wastewater to Lakeland Dairies Ltd. Lough Egish, Castleblayney, Co. Monaghan. Currently an average of 300m<sup>3</sup> of wastewater is transported to Lough Egish on a daily basis. The increase in processing capacity can be achieved through increased utilization of already permitted and operational processing plant within the site. A 4million euro investment upgrade and expansion of the WWTP was carried out in 2010/2011. It is proposed to carry out upgrade works to treat the cooling water /condensate

as an effluent. There is an accredited Environmental Management System in place at this site since the late 1990's. The applicant liaised closely with Cavan Co Co and the Fisheries Authority when developing these proposals.

Baileboro Foods Ltd. propose to combine the treated waste water discharge (W3) and Cooling water discharge/Condensate (W1) to a new single combined discharge outfall at W4 into Castle lake. The 2 existing discharge points would be decommissioned. It is proposed to retain the existing cooling water/condensate discharge volume & increase the Final effluent discharge to the Castle lake to a max of 1300m<sup>3</sup>. Currently process water is extracted through an underground pipeline from Castle Lake to the site. There is also an additional existing pipeline along the same route which is proposed to take the wastewater from the site to the lake.

Baileboro Foods Ltd is not proposing to change the discharge limits of the existing IPPC license P0406-03. It is proposed to increase the flows and to use the limits currently present for W1 as the New Discharge Limits. The Water Assimilative Capacity (WAC) calculations indicate that Castle lake water quality will comply with the EC Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009), i.e. Castle lake has the capacity to assimilate an increase in the maximum discharge volume of final treated effluent and cooling water from the Baileboro site.

### **Sludge**

Sludge is produced at the Waste Water Treatment Plant (WWTP). According to the application the existing Nutrient Management Plan has adequate capacity to deal with any additional sludge arising. The total amount of sludge spread in 2010 was 2437 tonnes (ref AER 2011), well below the total capacity available (3472 tonnes). The total capacity of sludge produced in 2013 has been reduced to 708 tonnes due to the addition of a sludge press in the WWTP. Sludge is currently removed from the site by an approved contractor.

### **Storm Water**

Storm water from road and parking areas on site are collected and pass through oil/petrol interceptors and combined with storm water from other areas on site (mainly roofed areas). All water passes through a chamber where it is monitored for pH, BOD and conductivity. There are 10 monitoring locations for storm water emissions, after oil water interceptors on site. These surface waters discharge to the surrounding river Lear.

### **Ground Water/Well**

There are four concrete septic tanks on this site, which are assessed and inspected every 3 years.

There is a deep bored well which supplies the sanitary and canteen facilities and is the drinking water source for the site. Annual monitoring of this drinking water supply, for a range of parameters is carried out. The application states that results to date show that there is no adverse effect on water quality in light of the European Communities Environmental Objectives (Ground water) Regulations 2010 (S.I. No 9 of 2010).

This well was bored over 20 years ago. There is no water treatment system on this well. It is contained inside a building and it has a removable sealed cover on the top of it to protect it from surface contamination.

The HSE advise to test wells at least once a year for microbial contamination, and at least once every three years for chemical contamination. The best time to test the well is following a period of heavy rain or flooding since this is when the well may be overwhelmed and become contaminated.

### **Waste**

Waste recyclables are segregated on site and collected by permitted waste contractor. Hazardous waste e.g. laboratory waste is labeled appropriately and collected by a permitted hazardous waste contractor.

No new wastes will be generated on the site as a result of the changes in this application.

### **Odour**

The main potential source of odour from the facility is the WWTP. An odour Management Plan was prepared and agreed with the EPA. This office has not received any odour complaints regarding this facility.

### **Noise**

The documentation states there will be no significant noise generating items of equipment installed during the proposed Castle Lake pipeline development works. The proposed development will not result in additional noise sources operating on the site. The existing ambient noise environment experienced at the noise sensitive receptor will remain unchanged.

This office has not received any noise complaints regarding this facility.

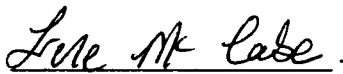
### **Air**

The main emissions to air are from boilers, dryers & CHP exhausts. The installation has a Green House Gas (GHG) permit from the EPA. No changes are required regarding control and monitoring for this license application regarding the boilers and CHP plant.

### **Construction**

Baileboro Foods Ltd operates 24hrs a day. Proposed construction hours are 9am to 5pm, Mon-Fri, & 9am-4pm on Saturdays, with limited or no construction work outside of this period. The proposed construction work is predicted to take approximately 2 months.

Yours faithfully,



Irene McCabe  
Environmental Health Officer