



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

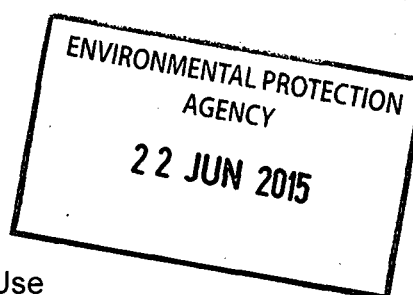
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Ref/ IMcC/CO'D

19 June, 2015

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).**

Class 2.1- Combustion of fuels in installations with a total rated thermal input of 50 MW or more.

Applicant: Bailieboro Foods Limited, Lear, Bailieborough, Co. Cavan.

Ref. No: PO406-05

EHIS Ref: 0328

Dear Ms Keavey,

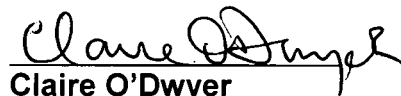
Please find enclosed the Health Service Executive consultation report in relation to the above application.

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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19 June, 2015

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

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

Class and Nature of Activity: Class 7.2.1 - The treatment & processing of milk, the quantity of milk received being greater than 200 tonnes per day (average on a yearly basis).

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Applicant: Bailieboro Foods Limited, Lear, Bailieborough, Co. Cavan.

Ref. No: PO406-05

EHIS Ref: 0328

Dear Claire,

I refer to the recent submission of an application for an IPPCL review from Bailieboro Foods Ltd. The following are observations and comments made whilst reviewing the said application, EIA and related documents in conjunction with EPA guidance documents and associated legislation and discussions with personnel during the Bailieboro Foods Ltd site visit on the 10th June 2015.

Introduction

The EIA was submitted as part of a planning application to Cavan Co Co in July 2014. Ref;14245. Planning permission was granted in October 2014 to extend the existing dryer facility, silos and bagging area, to construct a new CHP plant, a new dryer plant and 2 new evaporators. Construction works commenced January 2015 and are currently ongoing and projected to be completed by end of 2015 with commissioning in March 2016. It is expected that milk processed will increase from 750 million litres of milk to over 1 billion litres annually by 2020, as a result of the expiration of the milk quota system in 2015. A license review is

required for new air emissions points, increase in cooling water condensate discharge, the addition of a new class of activity (Class 2.1), and relocation of oil water separators. The company also has a Green House Gas Permit from the EPA. 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.

Consultation

Scoping- As part of the scoping process, prior to submission of planning permission in 2014, pre-application consultations were held with various bodies. The HSE were not included in the scoping process. The HSE would recommend that that it be included in scoping processes so that matters and observations where applicable can be communicated as early as possible to the applicant. These communications can be of benefit to the applicant as they may provide information which will assist them in the EIA process.

Public Participation

It is noted that the local Regeneration group, Development association, Community Alert and GAA club were consulted as part of the pre-planning application process.

Construction

Construction will take approximately 18 ~ 24 months. A Construction Environmental Management Plan (CEMP) is in place. The applicant confirmed that Cavan co.co. are overseeing the construction works and implementation of mitigation measures.

Process Wastewater

It is proposed to increase the cooling water (condensate) discharge from 1450m³ to 2200m³ per day which will be re-routed from the River Lear to form part of a combined discharge to Castle Lake.

It is proposed to increase the Total Nitrogen discharged from 4mg/l to 15mg/l. The Water Assimilative Capacity (WAC) calculations takes into account the increase in the proposed total Nitrogen Limit and indicates that Castle lake has the capacity to assimilate the proposed volume and Nitrogen increases. The EIS states that the water quality will comply with the EC Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009).

Domestic Effluent

The EIS states that there is sufficient capacity in the existing Wastewater Treatment system to cater for the extra effluent to be generated by extra staff on site. The installation of finishing sand filters and upgrade works will result in the discharge of the domestic effluent on site to ground.

Sludge

Sludge is produced at the Waste Water Treatment Plant (WWTP). The majority of sludge is sent to an Anaerobic Digestion Plant. The remainder sludge is sent for landspreading which is not located in the local area. 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 was reduced to 708 tonnes due to the addition of a sludge press in the WWTP. The total sludge landspread in 2014 was 394 tonnes and 10280 tonnes sludge sent for anaerobic digestion. 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 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 plant operates 24 hours/day, 7 days/week all year round with a scheduled week for maintenance and cleaning. The documentation states that the existing 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 the boilers, dryers & CHP exhausts. Bag filter technology will be installed as a dust abatement on the new dryer. Four new air emission points are proposed for the new dryer stack, CHP stack, and two gas burners. Based on the dispersion modeling there will be no exceedances of EU Ambient Air Quality Standards (Based on Directive 2008/50/EC).

At this time the HSE has no concerns provided that all mitigation measures for the construction and operational phases are implemented in full and that license limits are complied with in full.

Yours faithfully,

Irene McCabe

Irene McCabe
Environmental Health Officer

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