



### Submission

Submitter:	Mr Niall Leahy
Organisation Name:	Optima Technical Ltd
Submission Title:	Dairygold
Submission Reference No.:	S005530
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### Application

Applicant:	Dairygold Co-Operative Society Ltd and TINE Ireland Ltd
Reg. No.:	P1103-01

See below for Submission details.

Attachments are displayed on the following page(s).

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**Title:**

P1103-01 Dairygold

**Subject:**

Ref: P1103-01 regarding the granting of an effluent discharge licence to Dairygold Co-Operative Society Ltd and TINE Ireland Ltd

**Grounds for the submission:**

I strongly object to the application for an EPA licence. The following are issues that seriously threaten the environmental quality of Cork Harbour and the quality of life of its inhabitants.

1. The proposed scale of the plant given the lack of a suitable wastewater solution. The application itself has found that the proposed wastewater solution is likely to have significant disturbance/displacement impacts to the Cork Harbour SPA and Great Island Channel SAC (Special Protection Area and Special Areas of Conservation for wildlife)
2. The location of the proposed wastewater outfall, into a relatively stagnant upper harbour, and only meters from a Special Area of Conservation and a Special Protection Area
3. The volume of wastewater (4 million litres per day, with a pollution loading stated population equivalent (PE) of 69,000 (58,000 + 11,000), equivalent to over 5 times the population of Midleton. This is expected to be diluted and washed out to sea from Rathcoursey, which is 15km from the open sea, despite scientific evidence warning of the unsuitability of the location for adequate dilution.
4. The lack of consideration of an alternative outfall directly to open sea to avoid toxic build-up in the inner harbour.
5. The lack of traceability, and therefore accountability, in the event that the proposed receiving waters become polluted, as the proposed outfall coincides with the existing Midleton town outfall. The applicant has previously been convicted of environmental pollution.

6. The inadequate monitoring of levels of fats oils and greases (FOGs) being discharged into the harbour ("quarterly" as per application is inadequate), and the lack of remote and continuous monitoring by EPA or independent bodies.

7. The entrusting of water quality in Cork Harbour, including the protection of SPA & SAC areas, to a private company (previously convicted of pollution offences) that seeking to dispose of such vast quantities - 4 million litres of wastewater per day.

8. The greatly increased stormwater run-off to the Kiltha river, as a result of the greatly expanded Mogeely site, and the lack of stormwater attenuation proposed to prevent washout of the Kiltha ecosystems.

9. The potential for the numerous (classified as "dangerous") chemicals listed in the application to be washed into Cork Harbour, and the lack of control over the volumes used of these chemicals.

10. The potential risks, not only to the environment, but to the health of Cork Harbour and the 400,000 people in metropolitan Cork, many of whom are water users.

11. The lack of accounting for the significant additional discharge due to unprecedented population increase planned for Midleton. Outfall capacity calculations and pollution levels are based only on current population levels.

12. The admission in the application that concentrations of suspended solid wastes (several tonnes per week proposed) may daily breach Environmental Quality Standards when exiting the Rathcoursey outfall, which is both an area of scenic beauty and a local boating and swimming area.

## References:

*Note that "Attachment" refers to the title of the relevant applicant document as listed on the EPA website for this application.*

1. [Attachment-6-3-6 090151b2806d6d6b.pdf]

Section 4.7:

It has been concluded that the proposed Dairygold development is likely to have a significant effect, or significant effects cannot be ruled out at this stage, on the following Natura 2000 sites:

a) Cork Harbour SPA (004030)

b) Great Island Channel SAC (001058)

Further assessment is required to determine whether the project is likely to adversely affect the integrity of these Natura 2000 sites. This assessment is presented in the Natura Impact Statement (NIS).

Section 4.6.6:

"There is potential for significant cumulative impacts to the receiving water dependent Natura 2000 sites arising from the proposed works".

Section 4.6.4.4

"Therefore, it is concluded that significant disturbance/displacement impacts to the Cork Harbour SPA cannot be ruled out at this stage. Further assessment is required."

Section 4.6.3.2

Significant habitat alteration impacts to the Cork Harbour SPA and/or the Great Island Channel SAC cannot be ruled out.

2. [Attachment-6-3-6 090151b2806d6d6b.pdf page 21].

3. [Attachment-4-5-1 090151b2806d6d46.pdf]

The proposed volumes of wastewater to be disposed to the harbour are given as 58,000 PE (additional loading) and 11,000 PE (existing loading). This equates to a PE of 69,000, equivalent to well over 5 times the population of Midleton.  
[<https://savecorkharbour.wordpress.com/>]

5. [Attachment-2-5-1 090151b2806d6d2d.pdf]

6. [Attachment-7-3-1 090151b2806d6d86.pdf]

Is a monitored alarm triggered if the pollution reaches trigger levels?  
Is the EPA automatically notified of such events?

7. [Attachment-2-5-1 090151b2806d6d2d.pdf]

9. [Attachment-4-8-2- Appendices 1 & 2 090151b2806d6d5e.pdf]

A variety of acids, chlorites, chlorides, peroxides, hydroxides, sulphites, sulphates, nitrates, caustic sodas, ethanol, diesel and other chemicals are proposed to be used at the plant that will be washed into the wastewater piped to Cork Harbour. Many of these are "classified as dangerous for the environment" as per EPA application document referenced above.

11. [Attachment-6-3-7 Section 3 090151b2806d6d6c.pdf]

<https://www.corkcoco.ie/sites/default/files/2017-08/Cork%202050%20Main%20Report.pdf>

12. [Attachment-6-3-7 Fig. 4.6 090151b2806d6d6c.pdf]

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