
MEMORANDUM

DATE: 12 August 1998
TO: Board Members
FROM: Ken Macken
RE: Objection to the proposed determination of an IPC licence for MMF Limited, Glenawinna, Toomevara, Nenagh, Co. Tipperary. (Reg. No. 375)

This report is based on the findings of the Inspector dealing with the above licence application (Cormac Mac Gearailt), following a detailed examination of the above objection. These findings were presented to a Technical Committee comprised of:

Dr. Ken Macken (Chairman)

Dr. Vera Power

Dr. Michael Henry

who discussed the objection with Cormac Mac Gearailt on 12 August, 1998.

Application Details	
Register Number:	375
Class of activity:	6.2 The rearing of pigs, in installations where the capacity exceeds 3,000 units.
License application received:	23 rd December 1997
Proposed Determination Issued:	9 th July 1998
Third party objections:	None
Objection by Applicant lodged:	31 st July 1998

Consideration Of the Objections:

The company has raised 3 objections to the Proposed Determination as issued.

Objection 1

Condition 7.1.2

This objection refers to the time scale outlined for installation of rain-water guttering. The applicant objects to the stipulated six month time frame, and requests that it be extended to between 1-2 years.

Response

The applicant specifically stated as part of the IPC licence application, that "installation of rainwater gutterings will take place in the next nine months". At that time nine months was considered as dating from May 8th, 1998 and hence the six months period was inserted in the PD to allow for time already elapsed. As the objection would appear to indicate some slippage in the timeframes, it is now recommended that the nine months timeframe should date from grant of the licence.

Recommendation :- Alter Condition 7.1.2 from "....within six months of date of grant of licence." to ".... within nine months of date of grant of licence."

Objection 2

Condition 7.2.7

This objection refers to the time scale outlined for inspection and testing of existing over and underground tanks. The applicant requests that tanks be tested when destocking of a building occurs. This will be concurrent with the construction of new buildings on site. The applicant has outlined no time frame for these tests.

Response

Testing of underground tanks is considered an essential check in controlling environmental impact of these activities. However, the disruption caused by destocking is noted.

Recommendation :- Change Condition 7.2.7

From:

7.2.7 The licensee shall prepare a programme for agreement with the Agency on testing and inspection of under and over-ground effluent storage tanks and pipelines to ensure that all effluent storage tanks and pipelines are tested within six months of the issue of this licence and at least once every five years thereafter. A report on such tests shall be included in the AER.

To:

7.2.7 The licensee shall prepare a schedule for testing and inspection of under and over-ground effluent storage tanks and pipelines. This schedule shall ensure that all effluent storage tanks and pipelines are tested within an agreed time frame from the date of issue of this licence, and at least once every five years thereafter. This schedule shall be submitted to the Agency for agreement, within three months of date of grant of licence. A report on such tests shall be included in the AER.

Schedule 5(i) Recording and Reporting to the Agency shall also be changed to reflect the above:

From:

Schedule 5(i) Recording and Reporting to the Agency

.....
 Reports are required to be forwarded as set out below:

Report	Reporting Frequency	Report Submission Date
..... Tank and pipeline testing and inspection programme. Every 5 years Six months from the date of grant of licence; thereafter as part of the AER.

To:

Report	Reporting Frequency	Report Submission Date
<p>.....</p> <p>Schedule for tank and pipeline testing and inspection programme.</p>	<p>.....</p> <p>Every 5 years</p>	<p>.....</p> <p>Three months from the date of grant of licence; thereafter as part of the AER.</p>

Objection 3

Schedule 4(iv) Ambient Soil Monitoring

This objection refers to the monitoring frequency for ambient soil sampling. The applicant objects to the requirement for bi-annual sampling in the case of <10mg/l P soils and annual sampling of ≤15mg/l soils.

Response

These respective sampling frequencies are considered essential in order to effectively monitor phosphate levels in soils used for landspreading of slurry, but where it becomes apparent, after an appropriate amount of monitoring, that no significant soil phosphate accumulation is occurring, then under condition 8.2 the monitoring frequency could be reduced by the Agency.

Recommendation :- No change.

Dr. Ken Macken