

EPA

MAIN FILE ✓

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EVALUATION FILE en ✓

DATE 25/5/05 (en)

**Objection to Integrated Pollution Prevention
and Control License**

by

Reenard Farms Ltd.

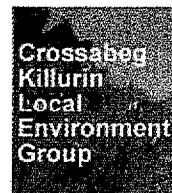
at Killurin Co.Wexford

received by the EPA on the 1st April 2005

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Reg No: 742

Environmental Protection Agency	
IPC Licensing	
Received	24 MAY 2005
Initials	<u>en</u>



In Opposition to the Application for an Integrated Pollution Prevention and Control License by Reenard Farms Ltd. at Killurin Co. Wexford received by the EPA on the 1st of April 2005

Introduction

We the Crossabeg/ Killurin Local Environment Group, representing over 200 families on both sides of the River Slaney, strenuously oppose the granting of an EPA IPPC following an application lodged on April 1st 2005 with the EPA, Reg. No. 742 for a review and extension of the license by Reenard Farms Ltd. due to grave concerns arising from its application to operate an Anaerobic Digester on a site abutting the River Slaney, a candidate SAC site.

This area has traditionally a farming and fishing area, the river is extensively used as a recreational facility (anglers, fishermen, oarsmen) and is an area of great natural scenic beauty (See photos attached). The area has in recent years become more densely populated residential area with a demographic profile covering all ages. It is home also to a number of protected wildlife species. The proposed development is of an industrial nature and is not in keeping with the history of the area.

The application for this licence was found to be deficient in a number of key areas as outlined below. In addition all of the required attachments for licence approval have not been provided in the submission.

In this report we outline the issues of greatest concern to the local community in the following summary (Page 2). We then present a full technical review of the IPPC licence application and we outline the sensitivity of the receiving environment.

Summary

Issues of greatest concern to the local community:

- **The Pollution of the River Slaney a candidate SAC-**

Poor management of the proposed development, proximity to the reed beds and the river.

- **Total unsuitability of the site-**

High water table, area prone to flooding.

- **Land ownership conflicts with management of the site-**

No consultation with adjoining landowners with regard to surface run-off of water pipeline.

- **Odours-**

No assessment of odour nuisance which is "Potentially injurious to human health". Link between odour nuisance and human health is well documented.

- **Traffic-**

No evidence that the load bearing capacity of the bridge and approach roads is sufficient for this commercial activity. The danger and nuisance of heavy lorries to local residents. The local community centre is located on the approach road.

- **Groundwater-**

A number of people in the community have sunk groundwater supply wells. The risk of organic contamination to the groundwater has not been quantified.

- **Competency of the management-**

Bearing in mind the sensitivity of the area and the previous record of the applicant we have concerns in this area.

- **Heritage of the site-**

An ancient Urn now preserved at the National Museum was discovered in the sandpit spanning the adjoining Freeman farm and the present pig fattening unit.

- **Visual Impact-**

The height and scale of the proposed development is totally at odds with its rural scenic location.

Technical Review of IPPC application

The section headings in the following review refer to the headings outlined in the licence application.

Section A – Non- Technical Summary

Poorly presented application for review of IPPC Licence.

1. Public file presented to EPA by the applicant has the following pages missing; 15,18,19,20,24,45,49,50,51,66,67,68,69,& 70. The EPA kindly provided us with all of the above with the exception of page 45 which is still outstanding.
2. Because the IPPC application form itself is the only part of the document to be numbered (i.e. 1-71) it is not possible to ascertain if the application is complete or if other pages or sections are missing.
3. Poor quality of photocopies, and print quality of large areas of drawings, means that large amounts of information are illegible. Consequently the submission as presented to the public does not clearly "Identify and describe the entire activity" as required by this section.
4. Attachment No A1 – supporting information cannot be found.

Section B

Section B3- Class of Activity

1. An increase in pig production from 7500 to 8500 is proposed. An increase of approximately 15% in production may warrant a full environmental assessment.
2. A new Class of Activity Class 11.1 i.e. Waste Handling for the proposed development of an Anaerobic Digester is sought. The principle of changing from intensive piggery to waste management sits uncomfortably with the existing site activities and core competency if any.

Regarding Attachment B5-

1. Previous planning application drawings submitted with the application were impossible to read.

2. The latest planning application Planning Reg. No. 20050055 to Wexford County Council which fully reflects this license application was refused planning permission on 8 March 2005.
3. The applicant was required to provide confirmation from the planning authority whether or not an Environmental Impact Statement was required for the proposed development. The applicant did not provide this confirmation, and indeed makes no reference what so ever to an EIS requirement.
4. **Attachment No. B8** cannot be found.

Section C- Management of the Installation

Regarding page 17 of 71:

1. The EPA has previously experienced problems regarding other licensed activities managed by the operator of this proposed development (Appendix I details examples of mis-management by this operator). In light of this one would question the competency of this candidate to hold an IPPC License at this sensitive site.
2. The operator has no experience in operating an anaerobic digester and the perception gleaned from this section clearly leaves one with the impression that the Management are not fully aware of the problems associated with an anaerobic digester.
3. The proposed development is subject to sub-contraction. There is no evidence for effective management historically between the management and the proposed operator. The link between the owner and the operator of the system is unspecified.
4. The operation of this complex technology requires high levels of competency from staff, no specific details of a particular training course have been provided. No criteria for staff competency are available.
5. The anaerobic digester is a fully automated process that operates 24 hours per day and seven days per week. Manual staffing will only be provided for 2 to 4 hours per day, all other monitoring will be remote. This is problematic as digesters are prone to breakdown resulting in the escape of gases to the atmosphere while corrective actions are being taken, with a risk of explosion.

Section D – Infrastructure and Operation

Regarding page 18 of 71:

The feasibility of anaerobic digestion at the Killurin site as determined by NRGE Ltd appears to be dependent on the importation of gases from the existing Landfill. How was this feasibility determined? Has this been agreed with Wexford County Council? In the absence of this agreement is anaerobic digestion at the proposed site a feasible option? There is nothing in the Wexford County Council Residual Management Plan for the Killurin Landfill site to suggest that the export of Landfill gas to a commercial enterprise is a sustainable decommissioning procedure.

Regarding page 19 of 71:

1. Belly grass, commonly known as Paunch, which will be used as an organic raw material, comprises of a mixture of different gases and aggressive acids (Ammonia, Methane, Hydrogen sulphide, Mercaptans, Sulphides, Polysulphides etc.). The leachate from Pauch is a major pollutant, and is also very odorous (often non detectable by chemical means but very overwhelming to the human olfactory system). 95% of Slaney valley residents live downwind of the proposed site.
2. The proposed operating temperature within the digester of 55°C may not be sufficient to destroy pathogens and weed seeds. A similar plant at Kristianstad in Sweden is licenced to operate at 70°C to ensure destruction of pathogens and weed seeds (information obtained from IFA headquarters).
3. The Digester and storage tanks are to be constructed from Mild Steel. This is of concern as it can result in a major risk of pollution to the River Slaney and to the underlying groundwater and to the environment, due to the highly corrosive nature of the variety of acids emanating from the bellies.
4. The organic matter arriving at the site will be transported by trucks, and will be tipped directly into the covered mixing tank, or pumped into material tanks. This could result in major spillages and release of odours into the environment both during the transport and when tipping the material into the reception area for the raw material.

Regarding page 20 of 71:

With regard to gas extraction

1. There is no quantification of the risk of explosion from the gases generated by the digester.
2. What are the proposals to deal with the odours in the event of the digester breaking down?
3. Totally inadequate consideration is given to dealing with the contamination generated by a variety of gases other than H_2S as mentioned above. Is the method of abatement of H_2S gases inadequate in dealing with the other gases generated eg. mercaptans.
4. As the abatement is dependent on microbial activity, it is of concern that micro organisms are very susceptible to shock loading. Performance would be compromised in this event; what controls are in place to reduce the likelihood of shock loading?

There is no assessment given to the risk of Fire.

There is no traffic impact assessment included.

Section E - Emissions

Regarding page 34 of 71:

No predictions of odour emissions have been included. Bearing in mind that the site is situated in a valley on the bank of the River Slaney, and the odours both from the adjoining Landfill site and the Piggery, tend to hang in the valley, and meander like a fog along the river, and inland to the surrounding area it seems negligent that:

1. **No map** detailing the situation and aspect (relative to prevailing winds) of residences in the area is included.
2. **No quantification** of the impact that the odour will have on the residences in the area has been presented (even at present odour from the existing piggery and landfill causes a nuisance to local residents (see Appendix II)
3. **No quantification** of the impact of the odour at the site boundary has been investigated, which is particularly worrying as the adjoining area is one of such a sensitive nature.
4. **No quantification** on the impact that the odour will have on anglers, rowers, boating enthusiasts and visitors to this tourist area. The degradation of this high value amenity area is contrary to the concept of sustainability in estuarine ecosystems.
5. **No quantification** of the impact that the odour will have on each individual species of protected wildlife in the area (this comment holds true for all environmental impact issues i.e. noise, groundwater contamination (See Appendix III page one). This area is a candidate Special Area of Conservation (SAC) selected for alluvial wet woodlands which are a priority habitat on Annex I of the E.U. A number of species listed on Annex II of the same directive are found here – including the Sea Lamprey, River Lamprey, Brook Lamprey, Freshwater Pearl Mussel, Twaite Shad, Atlantic Salmon and Otter (See Appendix III for full habitat details of the site).
6. The transport and storage of animal wastes such as fish, belly grass etc. will attract pestiferous species such as rats, grey crows, gulls, magpies that may cause an imbalance in this protected fragile ecosystem.

Section E2- Emissions to Surface Water

Regarding page 36 of 71:

This site is prone to flooding. Water is known to run down from the site and out onto the road causing the road to flood before discharging to the river. In this application there is **no quantification of the surface water discharging** from the site, **no characterisation of the surface water** on the site and there is the likelihood that soiled surface water and clean water cannot be separated in times of heavy rainfall. This creates a situation where there is a very **high risk of its discharge** into the River Slaney, a designated candidate SAC and a known salmonid river. Salmonids (trout and salmon) are highly sensitive to water quality and environmental stress. Major omissions in this section include:

Attachment No E2 cannot be found. However licence application drawings are included. Supporting information for "Proposed Works" cannot be found with reference only to current IPC Licence 453.

1. Drawing No 10 cannot be found.
2. Print type is very faint on several drawings, and when photocopied cannot be read.
3. Drawings do not indicate ground levels. As such it cannot be ascertained if tanks etc, are above or below the ground.
4. Drawing No1 & Drawing No 11 are the same drawing, titled 'Proposed Site Layout'.
5. Storm water monitoring point 'C' is called up but not located.
6. Storm water monitoring points 'A', 'B', & 'D' is not indicated.
7. The final outfall of storm water is not indicated on drawings, as required for clarity.

8. The main storm water drain travelling from East to West passes under, through, or over the proposed Tanks 29 & 30, depending upon the position of these tanks in relation to existing ground level. This is totally unacceptable.
9. Storm water drains from roofs of proposed buildings and tanks is not indicated. Where does this storm water go?
10. Storm water drains to West and East travel to the site boundary line and stop dead at adjoining land owners property, with no further explanation as to the final outfall. No agreement has been reached with the adjoining land owners in relation to the routing of storm water onto their lands.
11. A drawing prepared for a much older planning application (site layout plan 1:200, date illegible) was submitted with licence application drawings. This drawing shows two drains piped to "streams", however this drawing shows none of the proposed works, and can not be tied in with more up to date site layout plans.
12. The site layout plans do not indicate a soiled water collection system. The applicant states that soiled surface water will be diverted to the pig manure storage tanks. This is unacceptable. What happens after heavy rainfall if pig manure tanks are full of soiled surface water? Surely it makes more sense to quantify all soiled water areas and provide a separate storage tank for same, sized accordingly to allow for excessive rainfall.
13. The site layout plan does not clearly show the extent of soiled water areas i.e. concrete yards, driveways, hard standing areas, circulation areas, and does not show any drainage collection system for these areas. Is the soiled water from these areas presently going to pig manure tanks?
14. Attachment E2 referring to meteorological data for the region where the site is located cannot be found on the licence application.

Emissions to Ground

1. The applicant states that "*there is no discharge of storm water from this facility to ground. Therefore this section is not relevant to this application*". This is totally incorrect, as can be determined by the above points regarding soiled water.

N.B. There is no soiled surface water collection system indicated on the drawings and therefore soiled storm water from uncovered areas, yards, driveways, etc. will discharge to ground water. As is the case now it will discharge directly on to the public road and into the River Slaney.

2. Drawing No 12 & Drawing No 13 indicate a network of drainage pipes connecting to the existing storm water drain. This network of pipes is directly under the following;
 - Proposed Tank No 1
 - Proposed Tank No 2
 - Proposed Tank No 3
 - Proposed Mixing Tank
 - Proposed Digester
 - Proposed New Fattening House 9 A

It is totally unacceptable to collect surface water from around and under these buildings, and then connect into a clean storm water drain. These areas along with others (i.e. around proposed tanks 29,30, & 24 , and proposed secondary digester, plus around existing buildings), are most vulnerable to becoming soiled in the day to day workings of such a plant, spillage leakage etc.. These are the very areas from which drainage should be collected separately, - thereby creating some degree of a safety net in the event of leakage or spillage. Collecting from these areas and collecting to storm water as proposed is giving a pathway for pollution directly to the River Slaney and is both incompetent, and unacceptable.

1. The 'Typical Cross Section' on Drawing No 14 shows that the proposed new fattening house is of shallow tank construction with the proposed network of drainage pipes under same.
2. There are no drainage invert levels on any of this pipe work. Considering the depth of the pipe work under the fattening house.
 - a. Is it possible as proposed to connect to the existing storm water drain?
 - b. At what depth is the storm water drain?
3. Why is there no drainage network under tanks 29, 30, 24, and the secondary digester? The environmental risk to underlying groundwater has not been quantified.

To summarise, regarding "Emissions to surface Water" and "Emissions to Ground", in this instance:-

- 1) Rainwater off roofs should only discharge to the storm water drain

- 2) Rainwater under and around all proposed and existing buildings should be considered 'Soiled Water'. It should be collected separately in holding tanks. It then should be environmentally assessed and disposed of accordingly.
- 3) All proposed works should take full cognisance of 'Emissions to Surface Water' and 'Emissions to Ground' which clearly this application as proposed does not.

Section E4- Noise Emissions

Regarding page 40 of 71:

We totally refute the statement that "*noise levels are not generated beyond the site boundary*". The noise emanating from the existing equipment being used in the Pig Farm can be heard in the surrounding area (See Appendix II a list of householders attached which confirms this). Furthermore the additional noise of a gas fueled generator engine in this peaceful rural setting has not been quantified or adequately addressed. There is no proposed monitoring, management or abatement plan for these increased noise levels.

1. No background noise survey has been included
2. No quantification of existing noise impact has been included
3. No quantification of the additional noise impact arising from the proposed development has been included
4. No assessment of the effects of additional noise on the quality of life of residents or the impacts on wildlife in the area.

Sound travels better over water and at night and resonates through valley topography this explains why so many people at present hear the auger operating in the piggery at night. The disturbance of sleep patterns has serious implications for health (immune system), productivity and well being of local residents.

Regarding page 46:

6000 tonnes per annum of additional waste is to be imported annually to the site namely belly grass from meat factories and flotation sludges from the dairy industry

1. Will this sporadic influx of different waste constituents lead to increased occurrences of shock loading to the digester bacterial flora and subsequent operational and emissions risks?
2. Will the source of these additional wastes be properly documented and controlled?

3. Is there a risk that additional waste types other than those stated may be used at this facility, and digestate of these wastes spread on local farms?
4. The reference to additional waste inputs on page 19 fails to specify the exact type and nature of the waste with the word “*etc.*” being used to identify these inputs which is totally unacceptable. It would appear that waste will be taken in at a whim with no complete list of waste types being furnished.

Section H2- Waste Handling

Regarding page 47 of 71:

There is no evidence that any of this material is being transported by an appropriately permitted contractor, or is being disposed of in an appropriate licensed facility.

Section H3- Waste Handling

Regarding page 48 of 71:

There is no evidence that any of this material is being transported by an appropriately permitted contractor, or is being disposed of in an appropriate licensed facility.

Section H4-Waste Handling

Regarding page 49 of 71:

There is no evidence that any of this material is being transported by an appropriately permitted contractor, or is being disposed of in an appropriate licensed facility.

Section H5-Waste Handling

Regarding page 50 of 71:

There is no evidence that any of this material is being transported by an appropriately permitted contractor, or is being disposed of in an appropriate licensed facility.

Section 1 – Existing Environment and Impact of the Activity

Regarding pages 53, 54, 55 and 56:

There is no quantification of environmental impact anywhere in this section. It is completely deficient up to and including page 56. The deficiency of this section exhibits a complete disregard for the staff of the facility, the residents of this area, the fragility of the location of this site and the bordering environment.

Accident Prevention and Emergency Response

Regarding page 56

It is alarming how inadequate the procedures are to address the risks of fire, gas leakage, explosion, structural collapse and contamination etc.

1. There is no information regarding measures to be taken in the event of the above giving the impression that humans are not as important as the environment.
2. Emergency procedure seems to rely entirely on a series of telephone numbers.
3. We are very concerned that in the event of an emergency there is no procedure to alert residents in the adjoining area.

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Additional Observations

1. There are no ground water monitoring proposals to deal with sub surface tank leakages.
2. There are no measures to prevent the contamination of ground water in an area where the water table is high, and the downstream effects of contamination are great.
3. No consideration has been given to the effects of worsening high tides at this site compounded by climate change increases in Sea level and frequencies of Easterly and South-Easterly storm events.
4. Overland flow of contaminated surface water and the movement of contaminated groundwater is not limited by the boundary of this proposed development; it is of huge concern that the site location is in such close proximity to the River Slaney especially taking into account the inadequacy of the monitoring and management strategies to tackle pollution events.
5. There is no assessment of the impact on the neighbouring residents, or the protection of the Flora and Fauna of the River Slaney (a candidate SAC), protection of which is implemented through a suite of Irish and European legislation.

The proposed development is situated on the banks of the River Slaney, an area that is designated under the following headings in the Wexford County Development Plan 2001.

The River Slaney is designated water, under the European Communities (Quality of Salmonid Waters) Regulations 1988 and one of few remaining spring salmon rivers in Ireland. The Council recognizes the fishing status of the Slaney and its tributaries and the contribution it can make to tourism. The River Slaney is a candidate for Special Area of Conservation

and supports several species listed in the European Habitats Directive. As such the River Slaney is not only of national conservation significance, but

has now been included in European legislation. (Section 5.11) Natural Heritage Area. (Section 8.3.1)

The River Slaney is designated an area of Vulnerable Landscape, which represents the County's highest quality scenic landscape, with limited potential to absorb intensive industrial development, and needs to be given the greatest possible protection. (Section 8.5.3)

The River Slaney is designated as an area of High Amenity (Section 8.5.13)
Killurin Bridge is on a scenic Route No 9B (Section 8.5.15)

It is the policy of Wexford Co. Council to protect inland waterways as resources for water based activities, including angling and cruising. (Section 6.3.5)

The Slaney Valley in Killurin is now a candidate for SAC. It has now been designated as a SCI, a Site of Community Importance, and has now been sent back to Dublin for formal ratification, which is purely a formality.

6. This is an Archaeological site of great significance. Bearing in mind the construction of tanks below ground level a cultural heritage assessment should be required.
7. There is no acknowledgement of the grave responsibility of the operator of such a facility in such an area to act in a way that shows due care to both the neighbouring residents and the neighbouring environment.
8. Local farmers of adjacent lands are opposed to the development due to potentially adverse effects on, and unquantified risks to their property.
9. The spread of digestate fertiliser is not without risk. At a recent IFA delegates monthly meeting concerns were raised regarding the quality assurance of produce derived from lands on which digestate was spread. The teagasc expert on slurry disposal is of the opinion that digestate should ideally be spread on tillage land. There is potential risk when spread on grass land. It should not be spread on grassland grazed by milking cows.

Other digestate problems include (a) Nitrogen Levels of digestate are not consistent; they can vary from 20% - 60%. (b) There is an inherent risk of leaching into streams & rivers and (c) there is an increase in odour during storage.

10. Because of the Nitrates Directive (and potentially due to negative attitudes to digestate) it will be necessary to store large volumes of digestate over long periods of time (November to February especially). This site is most unsuitable for long term storage of such material. Leaking tanks or pipes coupled with the surface run off and flash flooding will result in contaminated water running directly downhill to pollute the river, especially in winter.

In Conclusion

We the local community have no confidence in the accuracy and comprehensiveness of documentation submitted to date. As we are sure the EPA is aware, according to statute the EPA is not authorised to grant an IPPC licence to a facility which will cause environmental pollution. Based on the limited resources available to our community, even at this stage the documentation submitted does not demonstrate that the proposed development will not cause environmental pollution nor does it evaluate the possible environmental impacts. We would request that the community action group is circulated with all correspondence and associated reports related to the proposed development because we as a community are significant 'stakeholders' in its consequential implementation. We are prepared to engage further in specific queries.

Signed :

John Morris
Michael O'Sullivan
Gerry Walsh

Correspondence Address:

C/o John Morris
Ballyharran Upr
Crossabeg
Wesford

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Photo 1: View from Killurin pier showing existing piggery in background.



Photo 2: View of bridge on access road, with piggery in background.



Photo 3: View of pier directly opposite the proposed development.

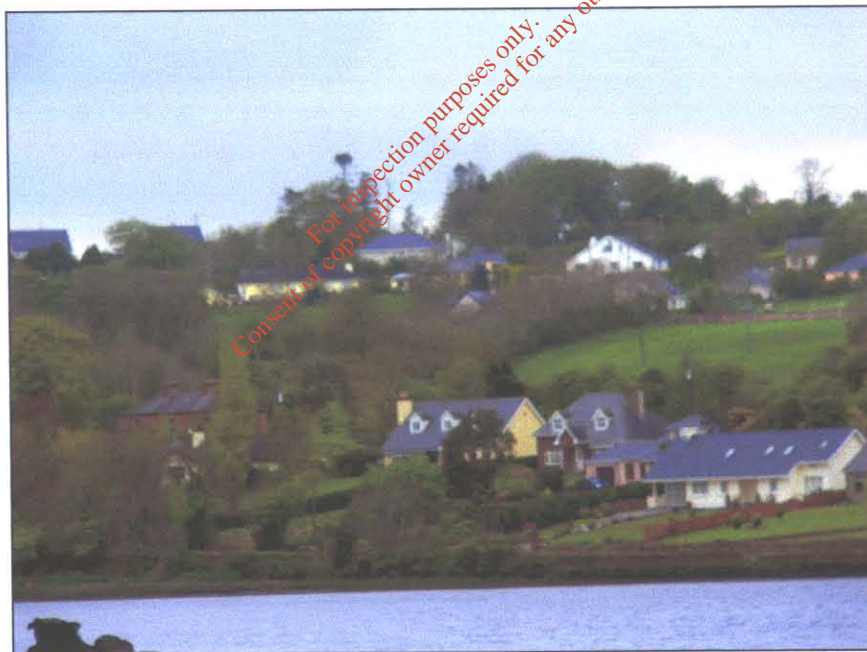


Photo 4: View of houses adjacent to the pier above.



Photo 5: View showing pier and piggery in background.

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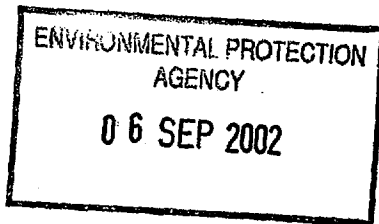
Appendix I- Management Record of the Licensee

A = Complaints against the Licensee (RE-licence REG No. 565)

B = Notification of non-compliance of a previous IPPC licence (licence REG No. 565)

C = Letter of concern from Department of Agriculture in relation to operating procedures by the operator while holding an IPPC (licence REG No. 565)

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Ms Grainne Feighery,
The Lodge,
Ballydoyle,
Cashel,
Co. Tipperary.

Environmental Protection Agency,
Johnstown Castle,
Co. Wexford.

5th September 2002

Dear Sir/Madam,

I am writing to highlight to you a continuous problem we are experiencing in our small community of Rosegreen, Cashel, Co. Tipperary.

My name is Grainne Feighery and I have been living in the Rosegreen area for five years. During this time I have lived with offensive odours from the local Ronan Industries Plant. When the smell arises the first thing I do is close all windows in my house, usually by this time the smell is already in my house. It's difficult to sleep by night when the smell is most prevalent. You would not understand the extent of this problem until you live in the area.

As of late this problem is on the increase. While driving from Clonmel recently I met an oncoming truck from Ronan Industries, the smell from the vehicle was immediate and as I travelled back the road the smell was prominent in the air for many miles.

The idea of Ronan Industries trying to set up an Incinerator in the area is devastating. Like Aidan O'Brien I know I would be leaving the area.

Please look at our side of the story, hoping you can do something for our community,

Yours faithfully,

Grainne Feighery
Grainne Feighery



A E R

JAN - DEC 2002

A = COMPLAINTS

Complaints Summary

Table 1 shows complaints received by National By-Products during the reporting period. Table 2 provides the Summary Table as per AER guidance.

Table 1

Date	Jan	Feb	March	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
2002	4	1	0	0	2	1	1	7	30	7	3	0

Table 2

Environmental Complaints		2002
Categories of complaint	Complaints received	56
	Complaints requiring corrective action	56
		2002
	Odour	56
	Noise	
	Water	
	Air	
	Procedural	
	Miscellaneous	

ENVIRONMENTAL PROTECTION AGENCY
An Ghníomhaireacht um Chaomhnú Comhshaoil



Mr. Stephen Houze
Environmental Engineer
National By-Products
Castleblake, Rosegreen
Cashel
Co Tipperary

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Johnstown Castle Estate
County Wexford
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Tel: +353 53 60600
Fax: +353 53 60699

Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman
Éire
Email: info@epa.ie
Website: www.epa.ie

Date

Our ref.

Your ref.

9th September, 2002.

M565/cc48ew.doc

Dear Mr. Houze

Please find enclosed a copy of a complaint received from Grainne Feighery on 09/09/2002 in relation to your facility. The contents of the enclosed have been noted and may be subject to further action by the Agency.

Please revert to the Agency detailing your response to this complaint, outlining any unusual incidents or circumstances concerning the period in question and where relevant, the measures put in place to prevent a reoccurrence of such incidents. Please quote the above reference in all future correspondence in relation to this matter.

Yours sincerely

Emily Williamson

Licensing and Control

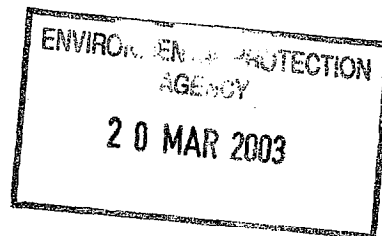
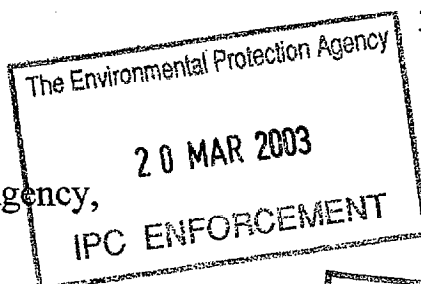
Encls.



MS65

Mr. & Mrs. Andrew Murphy,
2, Coronation Street,
Rosegreen,
CASHEL,
CO. TIPPERARY.

Environmental Protection Agency,
P. O. Box 3000
Johnston Castle Estate,
Co. Wexford,



16th March 2003

Dear Sir/Madam,

Re : Ronan's Factory, Clonmel Road, Rosegreen.

We wish to complain yet again about the continuing foul smell yet again from the spreading of slurry resulting from Ronan's factory. Now we realise that they are decommissioning the lagoons from your previous correspondence to us. However we were lead to believe that they were not allowed to spread on Sundays. Well following yesterday's horrific stench I refrained yet again from putting out washing and not allowing my 6-month baby to be out in the garden through out the day. Well today, Sunday, the smell was unbearable. We had to bring washing back in that we had hung out first thing. Furthermore we were unable to air the house by opening any windows. We live in a row of houses more than a mile away from Ronan's and to be honest none of use could appreciate the glorious weather we are experiencing.

We appeal to you to take action against the continuing floundering by Ronan's of the regulations they are bound by. Once again we appeal to you to help our family as I am continually questioning my Husband as to why he brought us to this so say wonderful area when we cannot enjoy it. We live in fear for our family's health.

We thank you for your time concerning the aforementioned problems.

Yours truly,

Andrew & Polly Murphy.

EXAMPLE

14

The Environmental Protection Agency
28 APR 2003
IPC ENFORCEMENT

Tullamaine,
Fethard,
Co. Tipperary.
Friday April 25th, 2003

m565

Mr Pat Geoughan,
Environmental Protection Agency,
Johnstown Castle Est,
Co. Wexford.

RE: National-By-Products

Dear Mr Geoughan,

I am writing to you with a list of complaints in relation to
"National-By-Products" at Rosegreen, Cashel, Co. Tipperary. I already sent a list of
dates to you in December last, but as I have not received any confirmation I am
forwarding them again along with some new dates.

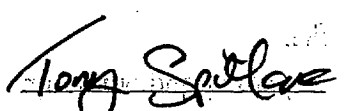
Enclosed you will find two pages with a number of dates and
times ranging from Monday June 10th, 2002 to Sunday March 2nd, 2003. These dates
are just some of the many occasions on which I got a foul and repulsing odour from
the aforementioned plant. The locations range from my home address in Tullamaine,
to the village of Ballyclerihan (approximately four miles from Ronan Industries)
along the public road.

This is just one aspect of the many problems associated with this
plant and I am hoping that the EPA under its current remit will do something of
"relevance" to correct the problem as it is a serious breach of environmental
legislation.

I look forward to hearing from you soon and hope that the EPA
will not yet again make an excuse for the behaviour of the plant as was done in the
past. My patience is running thin and from all the information I have gathered it
certainly does not improve my opinion of the EPA and their role in environmental
legislation.

Awaiting your prompt reply,

Yours Faithfully,


Tony Spillane

DAY	DATE	TIME
Wednesday	18/09/02	09:05
Wednesday	18/09/02	18:55
Wednesday	18/09/02	20:20
Thursday	19/09/02	02:10
Sunday	22/09/02	12:57
Monday	23/09/02	19:25
Tuesday	24/09/02	01:45
Tuesday	24/09/02	19:15
Wednesday	25/09/02	01:50
Wednesday	2/10/02	00:00
Saturday	5/10/02	18:50
Sunday	6/10/02	20:45
Monday	7/10/02	08:45
Monday	7/10/02	23:15
Wednesday	9/10/02	22:50
Thursday	10/10/02	20:00
Thursday	10/10/02	20:15
Thursday	10/10/02	22:25
Friday	11/11/02	08:15
Friday	18/10/02	08:30
Friday	18/10/02	13:45
Wednesday	30/10/02	13:40
Wednesday	30/10/02	19:50
Friday	3/01/03	11:26
Friday	3/01/03	17:25
Thursday	27/02/03	17:00
Thursday	27/02/03	17:29
Thursday	27/02/03	18:13
Sunday	2/03/03	18:35

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DAY	DATE	TIME
Monday	10/06/02	01:30
Wednesday	12/06/02	20:30
Thursday	13/06/02	18:00
Wednesday	03/06/02	20:11
Friday	05/07/02	15:05
Friday	05/07/02	16:40
Thursday	11/07/02	01:45
Thursday	18/07/02	18:21
Thursday	18/09/02	19:57
Friday	19/07/02	09:00
Tuesday	23/07/02	01:47
Sunday	28/07/02	13:00
Sunday	28/07/02	20:34
Monday	29/07/02	18:35
Wednesday	31/07/02	22:25
Friday	9/08/02	14:55
Friday	9/08/02	18:10
Saturday	10/08/02	14:25
Sunday	11/08/02	00:05
Wednesday	14/08/02	21:26
Friday	16/08/02	03:00
Saturday	17/08/02	17:45
Wednesday	21/08/02	02:10
Thursday	22/08/02	19:26
Sunday	25/08/02	13:40
Sunday	25/08/02	18:30
Sunday	25/08/02	01:30
Thursday	29/08/02	22:18
Friday	30/08/02	01:55
Sunday	1/09/02	18:25
Sunday	1/09/02	18:30
Monday	2/09/02	20:45
Monday	2/09/02	20:55
Tuesday	3/09/02	01:40
Tuesday	3/09/02	09:35
Tuesday	3/09/02	16:30
Friday	6/09/02	02:40
Wednesday	11/09/02	21:55
Thursday	12/09/02	02:15
Friday	13/09/02	03:10
Saturday	14/09/02	11:45
Saturday	14/09/02	15:35
Saturday	14/09/02	18:49
Sunday	15/09/02	18:20
Monday	16/09/02	08:43
Tuesday	17/09/02	01:55
Tuesday	17/09/02	19:10
Tuesday	17/09/02	22:35

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ENVIRONMENTAL PROTECTION AGENCY
An Ghníomhaireacht um Chaomhnú Comhshaoil



Ms Jean Hayden
Blackcastle
Rosegreen
Cashel
Co Tipperary

PO Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Tel: +353 53 60600
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Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman
Éire

Email: info@epa.ie
Website: www.epa.ie

Date

25/10/02

Our ref.

M565/gc21.doc

Your ref.

Dear Ms Hayden

Thank you for your letter to the Environmental Protection Agency regarding odour emissions from National By-Products. We received a significant number of complaints in relation to this facility and in response to these, which included yours, the following action was taken.

- We requested a written response to all complaints and carefully assessed these.
- EPA Inspectors carried out a number of daytime and night-time unannounced site inspections during August, September and October on the following dates:
August: Thursday 22nd & Friday 30th.
September: Thursday 5th, Monday 23rd, Friday 27th & Sunday 30th.
October: Tuesday 1st & Wednesday 2nd.
- We requested and received, from National By-Products, computerised data specific to wind direction and wind speed. This data has been validated.

Thorough examination by the EPA, of the above information, identified the following:

- A rendering odour was detected at locations downwind of the plant during a number of Agency inspections. These locations were at the lay-by, just past the factory gate and also approximately 200 metres down the cottages road. No odour was detected at any other location. This rendering odour is being generated from decommissioning of earthen lagoons on-site, mainly through agitation of the material in the lagoons in order to facilitate its removal.

This is part of an agreed programme and the timeframe for completion of this project is 31 October 2002. On its completion, approximately 50% of the effluent lagoons, which have been on-site for approximately 15-20 years, will have been decommissioned and land restoration finished.

The remainder of the lagoons are to be fully decommissioned in 2003 as part of an agreed programme of works. The Agency considers this work to be necessary to eliminate a significant potential source of odours from the site and to provide protection for streams and groundwaters in the vicinity of the site.

- A number of complaints could not be validated on the basis of wind direction. Inspection findings did not correlate with complainants allegations, or production records as certified by the Department of Agriculture and Food, which indicated that the facility was not in production during times when odour complaints were made.

You will be interested to learn that the revised Integrated Pollution Control licence, issued by the EPA to National By-Products in October 2001, imposes strict environmental controls on the company to limit, abate and reduce all emissions from the activity. As a direct result of strict enforcement of these conditions of the licence a number of major improvement works have been implemented on site. These works include the following:

- Installation of two Thermal Oxidation (TO) systems for the treatment of odours from both production plants in accordance with Best Available Techniques for the rendering sector.
- Elimination of rendering liquid effluent from the process through the installation of the TO systems, thereby eliminating any requirement for effluent lagoon storage and the associated landspreading practices.
- Construction of new process buildings and upgrade of existing buildings designed to ensure no odour escape.
- Installation of a new surface water collection/disposal system to improve quality of surface water discharges to the River Moyle.
- Construction of reinforced concrete bunding around blood storage and tallow tanks to ensure containment of these materials, in the event of spillage.
- Decommissioning of uncovered earthen lagoons for the storage of effluent – phase one is almost completed. Final phase to be completed in 2003, at which time approximately 2.4 hectares of lagoons are expected to have been fully decommissioned with the land area being returned to grassland use.

We consider that the above works if properly managed and operated by the company should ensure compliance with the licence. We are committed to maintaining a close watch on the site to ensure that this is the case.

The Environmental Protection Agency will continue to enforce the revised IPC licence and will take such enforcement action, as it considers necessary to ensure compliance with the licence. We will continue to log all complaints and to notify the company seeking explanations. Where possible, complaints should be made to the company in the first instance. The Agency will continue to inspect the site as it considers necessary.

May we thank you for your support, interest and assistance in this matter and to assure you of our commitment to enforcing this licence.

Yours sincerely,

P.P. E. Butler
Dr Tom Stafford.
Licensing & Control

B - NON-COMPLIANCE

ENVIRONMENTAL PROTECTION AGENCY
An Ghníomhaireacht um Chaomhnú Comhshaoil



Mr. Stephen Houze
Environmental Engineer
National By-Products
Castleblake, Rosegreen
Cashel
Co Tipperary

Regional Inspectorate
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Cigireacht Réigiúnach
Dea-Radharc
Bóthar Cluain Sceach
Baile Átha Cliath 14, Éire

Email: info@epa.ie
Website: www.epa.ie

Date

Our ref.

Your ref.

26 June 2003

M565/mnc02ls.doc

Notification of Non-Compliance

Dear Mr. Houze

The non-compliances with IPC licence Register No. 565 as detailed in the attached audit report have been noted by the Agency.


ACTION REQUIRED

- Submit a schedule to the Agency within ten working days which details how and when the non-compliances specified within the audit report will be rectified.

Failure to comply with the requirements specified in this notification of non-compliance will lead to further enforcement action by the Agency. If you have any queries please contact the Lead Auditor specified in the report.

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely


Leo Sweeney.
Licensing and Control

Encl.



ISO 9002



IPC LICENCE AUDIT REPORT

Licensee: National By Products

Register Number: 565 **Date of Audit:** 10/04/2003

Location: Castleblake **Announced/** Unannounced
Rosegreen **Unannounced:**
Cashel
County Tipperary

Person Contacted: Mr Stephen Houze **Previous Audit:** 08 July 1999

Position: Environmental Manager **Audit Criteria:** IPC Licence Reg. No. 565
Issued: 17/10/2001

Lead Auditor: Leo Sweeney **Inspector:** Patrick Geoghegan

1. SITE MEETING

On arrival at the site at 10.30 am the audit team were met by Mr Stephen Houze and Mr Michael Fitzgerald and an immediate inspection of the site was undertaken. The meeting to review reports, assessments, records documentation and procedures required under the IPC licence, commenced at 14:05 and the following were in attendance:

Representing National By Products:

Mr Stephen Houze Environmental Manager
Mr Michael Fitzgerald General Manager (for part of the meeting)
Mr Paul Whelan Plant Engineer (for part of the meeting)

Representing the Environmental Protection Agency:

Mr Leo Sweeney Lead Auditor
Mr Patrick Geoghegan Inspector

2. ON-SITE ASSESSMENT

2.1 Site Tour

A tour of the site was conducted, special attention was paid to the waste intake/ handling areas, bunding and containment of wastes stored on site, thermal oxidation systems, surface water collection/disposal system, earthen lagoons as well as general site housekeeping.

2.2 Interview

The following representatives were interviewed during the audit

Mr Stephen Houze	Environmental Manager
Mr Michael Fitzgerald	General Manager (for part of the meeting)
Mr Paul Whelan	Plant Engineer

2.3 Documentation

The following documentation was requested for review:

Record	Comment
Incident requiring Condition 4.1 notification	Adequate
Incident requiring notification to Local Authority	Adequate
Odour audit	Generally adequate
Fugitive emissions programme	Generally adequate
Management plan for handling, processing of raw materials	See observations (No. 4)
Energy audit	Adequate
Bund integrity assessments	See observations (No. 5)

3. CLOSING MEETING

The closing meeting commenced at 16:30 and the attendees were as at the opening meeting

Leo Sweeney gave a summary of the audit result. The licensee was found to be in non-compliance with the Integrated Pollution Control Licence in the area listed below. Observations made during the audit (listed below), were discussed.

The licensee was briefed on the Agency's reporting procedures and was advised that an audit report would be issued.

Finally, the licensee was thanked for the courteous and co-operative manner of the staff, and the assistance and co-operation extended during the audit.

4. AUDIT FINDINGS:

4.1 Audit Non-Compliances:

The audit process is a random sample on a particular day of a facility's compliance with some of its IPC licence conditions. Where a non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

The licensee was found to be in non-compliance with the requirements of the IPC licence in respect of the following on the day of the audit (Schedule and Condition numbers refer to the IPC Licence):

1. The building where blood is unloaded is not under negative pressure and consequently it is not capable of achieving a minimum air ventilation rate of 8 air changes per hour.

Condition 5.15 states

The air extraction rates throughout all buildings where animal by-products, blood, fish, intermediates or finished products (excluding cooled finished products) are deposited, stored, processed or manufactured shall be increased to provide a minimum air ventilation rate of 8 air changes per hour, within six months from the date of grant of this licence. A completion report, which shall form part of an air treatment improvement report, shall be submitted within seven months from the date of grant of this licence.

Corrective Action Required

The air extraction rates through the buildings where blood is unloaded shall be engineered to provide a minimum air ventilation rate of 8 air changes per hour as per Condition 5.15 above.

2. Tallow storage tanks (3) located at the SRM processing plant are not vented to air abatement plant. Tallow from storage tanks is being loaded out to road haulage tankers without any venting to air abatement plant.

Condition 5.19 states

The licensee shall, within six months of the date of grant of this licence, ensure that all air emissions arising from loading/unloading of on-site tallow storage tanks and blood storage tanks are vented to suitable air abatement plant. In addition all tallow and blood transport tankers shall be vented to suitable air abatement plant or back vented. A report on the venting of emissions to air abatement plant shall be submitted to the Agency within one month of completion.

Corrective Action Required

Vent air emissions arising from loading of on-site tallow storage to road haulage tankers and from on-site tallow storage tanks to suitable air abatement plant as per Condition 5.19 above.

3. A raw material skip was observed leaving the confines of the raw material intake building without having its covering refitted.

Condition 7.9 states

All vehicles, trailers and containers used for the transport of animal by-products and fish to the site of the activity shall be washed down and shall have their coverings refitted prior to leaving the confines of the raw materials intake buildings and shall pass through a wheel wash after exiting the material intake building and prior to leaving the site of the activity.

Corrective Action Required

Ensure that all vehicles, trailers and containers have their coverings refitted prior to leaving the confines of the raw materials intake buildings as per Condition 7.9 above.

4. Raw material (SRM) was being stored in the open yard in a skip and a trailer unit.

Condition 7.10 states

Raw material for processing shall be uncovered, unloaded and deposited within the confines of the intake building. Raw material shall not be uncovered or deposited or stored in the open yard.

Corrective Action Required

Raw material shall not be stored in the open yard having regard to the requirements of Condition 7.10.

5. Underground pump sumps located at the blood intake building and SRM raw material intake building were not fitted with high level liquid alarms.

Condition 11.3.5 states

All pump sumps or other treatment plant chambers from which spillage might occur shall be fitted with high liquid level alarms within nine months from the date of grant of this licence.

Corrective Action Required

All pump sumps or other treatment plant chambers from which spillage might occur shall be fitted with high liquid level alarms in accordance with Condition 11.3.5 above.

4.2 Audit Observations:

While these observations do not constitute non-conformances with any condition of the licence, they should be addressed by the licensee and reported back to the Agency in accordance with the request under Follow-Up Actions below.

1. Waste Storage Lagoons

Decommissioning of the earthen lagoons is currently underway however there are four lagoons which contain high levels of waste. It is necessary to undertake a re-evaluation and assessment of the structure and integrity of lagoons which continue to be used to store waste to ensure that there are no possibilities of breaches or collapse resulting in spillage's. The decommissioning should focus on the reduction of waste levels in all remaining lagoons.

2. Raw Material Intake Buildings

The opening of doors on raw material intake buildings result in the escape of odours to the external environment. Inevitably this continues to be a source of odorous emissions from this facility. The company should provide air locks at each of the raw material intake buildings to ensure that odours from this source are avoided.

3. Covering of Raw Material

It was observed that some vehicles, trailers and containers used to transport raw materials are fitted with a mesh type covering. This type of material is not suitable for minimising odours and should in all instances be replaced with a suitable waterproof, washable covering.

4. Management of Blood

Management plans for the collection, transfer and processing of blood (in accordance with Condition 7.11) should be reviewed to incorporate the venting of collection tankers during the collection of blood at outlying sites.

5. Bund Integrity

There is a small ope on the tallow/oil storage bund which may allow the escape of liquids in the event of a spillage to this area. This ope should be sealed to ensure the integrity of the bund structure.

6. **Blood handling procedure**

A documented procedure should be developed and all relevant staff trained in blood handling and transfer such that spillage's and in particular nuisance odorous are avoided.

7. **Surface water interceptors**

Surface water interceptors (2) have been installed on-site through which all surface waters must pass prior to discharge. It is necessary to develop a documented procedure for the routine de-sludging of these interceptors.

8. **Maintenance and checking of High Level Liquid Alarms**

High level liquid alarms which are fitted to tanks from which spillage's might occur, shall be included as part of the routine maintenance schedule to ensure that they are maintained and tested routinely.

4.3 **General comment:**

National By Products received a revised IPC licence on 17/10/2001 which required significant upgrading of the facility over that which was required in the previous IPC licence. Since this revised IPC licence has been issued the company have installed two thermal recuperative oxidisers to treat the most odorous air streams arising on-site, in addition to eliminating waste water streams arising for disposal. The air bio-filters continue to deal with the low odour high volume air streams, arising primarily from raw material intake and processing buildings.

In addition the company have undertaken upgrading programmes to improve building integrity and have substantially completed phase one of the decommissioning of on-site lagoons. The final de-commissioning phase is currently underway.

Blood handling arrangement need to be significantly tightened up as detailed earlier in this audit report. In addition it is the view of this audit team that the provision air locks at raw material intake buildings would eliminate a significant source of fugitive emissions to atmosphere.

The company have invested significant resources in upgrading and improving this site since the previous site audit. The current situation represents a noteworthy improvement in environmental management and operations on site.

5. **FOLLOW-UP ACTIONS**

The licensee should inform the Agency of the actions taken to close out the Corrective Action Requests raised in this audit report. These actions will be verified during subsequent audits.

Report prepared by:

A. Geoghegan

Reviewed by:

Pat Geoghegan

Date:

26/05/03

Date:

26/05/03



Mr. Stephen Houze
Environmental Engineer
National By-Products
Castleblake, Rosegreen
Cashel
Co Tipperary

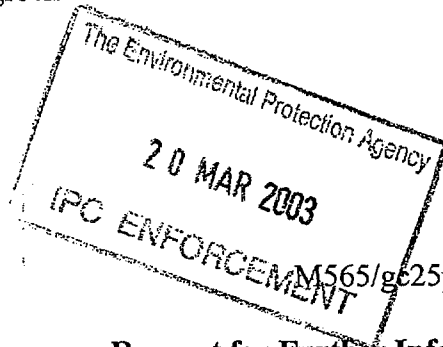
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Contae Loch Garman
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Email: info@epa.ie
Website: www.epa.ie

Date

19/03/2003



Our ref.

Your ref.

Request for Further Information

Dear Mr. Houze

The Environmental Protection Agency has reviewed the Notification report submitted on 12/03/2003 in response to spillage of effluent from earthen lagoons. The Agency requests that you submit the following additional information so that a complete assessment of the incident may be completed.

1. Provide an estimate of the total quantity of effluent which escaped from the lagoons onto:

- (i) the adjacent land
- (ii) the nearby land drain and river Moyle.

This estimate should be based on pumping rates of the mechanical plant employed to return the effluent to the lagoons. Cognisance should be taken of all losses through ponding etc.

2. Confirm that the loss of integrity of the lagoon wall as evidenced by the undersigned during the EPA site inspection of 13/3/2003, resulting in some effluent still escaping the lagoon, has now been remedied and that the breach of this lagoon wall has since been fully repaired through additional embankment restoration.
3. Submit weekly reports to this office detailing the progress on decommissioning of the remaining earthen lagoons on-site. These reports shall detail the following:
 - (i) quantity of effluent that is landspread and quantity remaining in lagoons
 - (ii) the date of landspreading
 - (iii) the identity of the contractor and method used



(iv) A 1:2500 scaled map of the area landspread

The first report shall be submitted by Monday 24 March 2003 and by Monday of each week thereafter.

Please revert to the Agency with information items 1 and 2 above within 5 working days of the date of this notification. If you have any queries please contact the undersigned at the above number.

Please quote the above reference in future correspondence in relation to this matter.

Yours sincerely



Patrick Geoghegan
Licensing and Control

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Mr. Sheridan DCVO
Dr. Gunn SSVI
Mr. Cassidy PO
Mr. Dinneny AP

Ronans Rendering Plant.

In earlier reports, I have expressed my concerns about the treatment of waste water at this rendering plant.

Background:

When animal by-products are treated at a rendering plant most of the water, which accounts for 60% of the weight of the raw material (90% in the case of blood), is removed as steam. This steam is condensed back into water and traditionally was sent to the waste water treatment plant where the nutrients were removed and the water then returned to nature. Lately a number of rendering plants have installed thermal oxidisers which burn off the steam and release the gasses to the atmosphere. (Ronans rendering plant was unique in that up until late in 2002 no proper treatment for waste water existed. This water was sent through a series of underground channels to lagoons on the land adjacent to the rendering plant and allowed to soak away).

The other type of water in a rendering plant is pathogenic water, which comes in with the raw material and derives from the washing of both raw material trucks and of the floors of the unclean part of the plant. This water must be directed to the processing line and be processed with the other raw material.

Numerous letters from Ronans, the most recent being that of 09/01/03 signed by Mr. Jack Ronan, claim that wash water is returned for processing. However, the report of Mr. Carthy SVI of 01/02/03 and the photographs of Dr. O'Driscoll VI make it clear that this was not the case and that water which should have been treated in the rendering system continued to make its way to a series of lagoons on the land below the rendering plant.

The explanation offered by the company is that one of the manholes over the drainwork to the lagoons was filled with concrete last November, thus preventing the waste water leaving a sump. The waste water, according to the company was then pumped back for treatment. This system failed due to corrosion of the concrete poured into the manhole.

This explanation is hard to believe.

The Department of Agriculture has been suspicious for some time that waste water from this plant was still being sent to the lagoons and the evidence of Mr. Carthy and Dr. O'Driscoll tends to confirm these suspicions. It must be emphasised that this water probably came from the unclean part of the plant and must be considered to have been pathogenic.

C - Letter OF
CONCERN FROM MS65
DEPARTMENT OF AG.

FAX COVER SHEET**TO : Dr. Gerry Byrne****EPA****Johnstown Castle****Wexford****Fax : 053-60699****Ph.****From: David Lynch****TSE Section****Department of Agriculture,****Food & Rural Development****Agriculture House (1W****Kildare Street****Dublin 2****Ireland****Fax 353 1 6072370****Tel 353 1 6072792****Date : 14/02/2003****Number of Pages to Follow : 17 (including cover sheet)****MESSAGE****Gerry,**

Ass.Sec. Tom Moran has requested that this apparent breach at the Ronan Rendering plant be investigated as a matter of urgency.

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Par A

The recent report on the cross-over of the MBM and bloodmeal lines is another example of the Department discovering that the facts were different from that which the company claimed.

These facts should be taken into account in any decision to award a SRM rendering licence to this company.

David Lynch SVI
14/02/2002

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District Veterinary Office,
Government Buildings,
Davis St. Tipperary
01/02/2002

Re: Leakages & Spillages at National By-Products Ltd.

Mr. David Lynch S.V.I.

Further to our phone call concerning the above Plant, the following are the main items of concern.

I received a phone call on Friday from Dr. H. O'Driscoll V.I. who stated he had great concerns over spillages and leakages which had occurred from the above Plant. He requested that I should visit the Plant and see for myself.

I arrived at the Plant at 4.45pm and had requested Mr. M. Fitzgerald, Plant Manager, to accompany me (together with Mr. John Hegarty S.A.O. and Mr. James Ryan S.A.O.) around to where these incidents occurred. Due to other commitments he did not arrive until post inspection had occurred.

As you are familiar with the Plant let me point out the location where the spillages and leakages happened as found by the Dept. Staff.

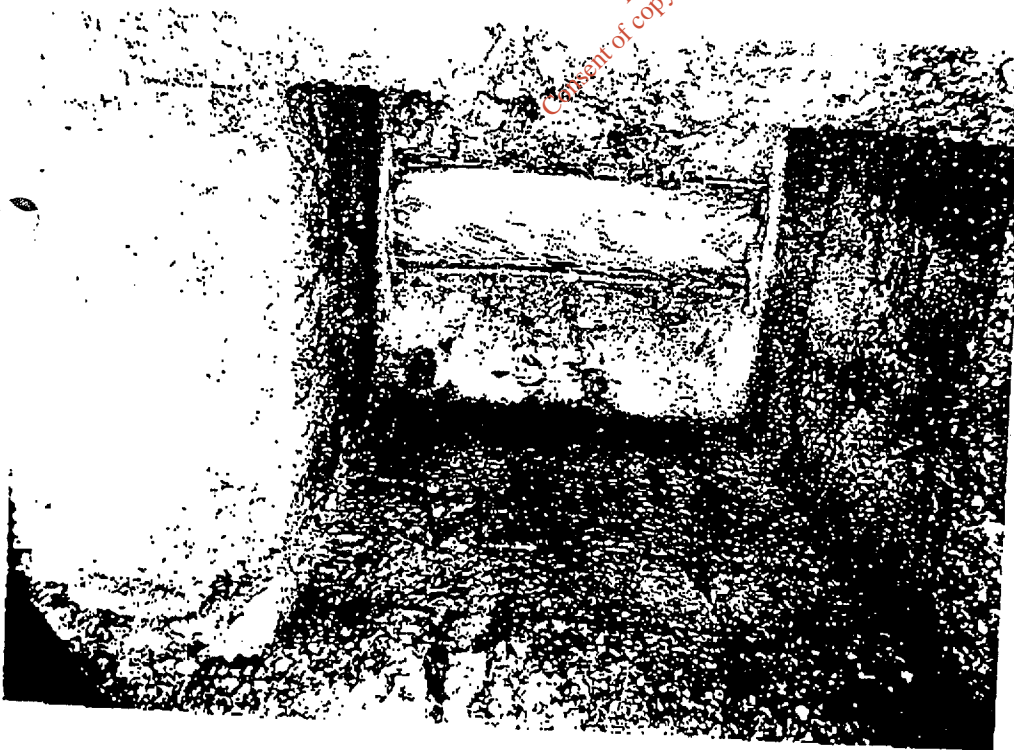
- a) The interceptor in the field beside the heatherbed of the "Bone & Fat Plant". On arrival three employees of the Plant were gazing down at the solid tallow that had accumulated in the interceptor and pipe leading into it. They were considering how to dislodge it and how it could have got there. We followed the pipe from the interceptor to its end but found no evidence of leakage to this point. Management had informed both yourself, myself and other Dept. Officials previously that this interceptor was required by the EPA to collect only rain water from both the bungalow yard area and surface water from the roof and yard of the "Bone & Fat Plant". Photos of today's evidence were taken by Dr. O'Driscoll V. I. And are enclosed.
- b) A manhole near the pig slurry tank - On my inspection there was no evidence of liquid flow thro' this system. However, 5 hours earlier the above named Dept. Officials observed a fast full flow of liquid thro' it. Dr. H. O'Driscoll had taken pictures to prove that is the case. We were informed that this pipe, which emanates from the holding tank in the yard, was made redundant when the factory installed the new Thermal Oxidizer. The holding tank is supposed to retain all spillages and washings from the clean area of the Plant and the tallow tank enclosed area for pumping into the steel tank. The liquid is then supposed to be pumped from there into the raw material intake container at the start of the sterilizer. Clearly this is not the case. It was quite obvious that the washings were going directly from the holding tank thro' this manhole directly into the lagoons and the volume and strength of flow did not suggest that it was a leak as suggested by the Plant personnel.
- c) The ground area around the tallow tanks has been sealed off by means of a low wall. It is alleged that the water downpipe from the roof of the adjacent building runs underground to flow into the holding tank referred to above. It was plain to see that this was broken possibly during construction of the retaining wall. It was thro' this pipe the spillage of tallow appeared to flow. I understand from Management that up to 4 tonnes of tallow could have overflowed during this spillage and that a similar spillage occurred the previous Saturday.

In light of the apparent breaches and the fact that it is at this location it is proposed to site the SRM Tallow tank for the incineration of tallow, Dept. Officials locally have grave concerns as to the granting of such a concession. I received a phone call to say the Co. is getting an outside contractor to look at the leakages and would forward a report to me.

Ray Carthy



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National By-Products

Reg. No.

565.

Address Castleblake
Rosegreen
Cashel
Co. Tipperary

Phone 052 35600

Notification Report

Date: 03/02/03

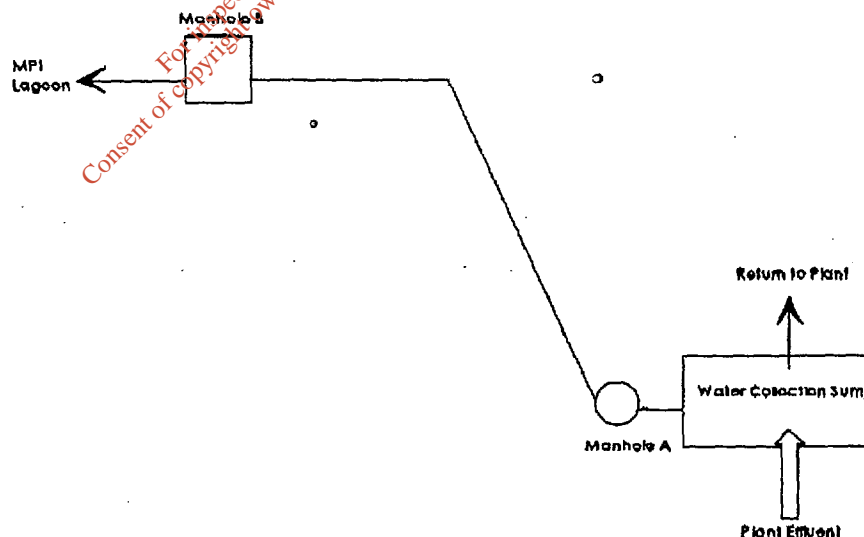
Occurrence Details

On the afternoon of Friday 31/01/03 it was reported that there was a discharge to the lagoon coming from the MPI plant.

Background

A thermal oxidiser was installed in MPI in September 2002. Subsequent changes to the pipework to ensure zero emissions from the plant were carried out in Nov 2002. This work meant that all effluent from the rendering plant was been treated in the plant.

Under the old system effluent from the plant went to the Water Collection Sump, onto manhole A and B and on to the lagoons for storage. After the thermal oxidiser was installed Manhole A was filled with a concrete mix so that discharge to the lagoon was no longer possible. A pumping system was installed in the water collection sump to pump liquid back to the MPI plant for processing. It was discovered on Friday that liquid was visible at Manhole B passing through to the MPI lagoon.



A coil was fitted to the small tank adjacent to the down pipe approx. one week ago. The coil is designed to keep any tallow coming from the valve and control system on the tallow tank from solidifying. During this work the old down pipe from the MPI building was broken at ground level. This is shown in red in photo No. 4.

On Tuesday the 28/01/03 an error in stock reports led to over-filling of the tallow tank adjacent to this downpipe. The overflow from the tank was of the order of 500 gallons. The vast bulk of this spillage was contained by the bund. But as the old downpipe from the guttering was broken at ground level some tallow made its way to the surface water drain.

Corrective Actions:

On Saturday morning 01/02/03 concrete was poured in order to seal off the old surface water pipe. The old down pipe was removed. This is shown in photo No. 5.

The tallow was removed from the interceptor and line and returned to plant.

Munster Drain were on site early Monday morning to finish this work.

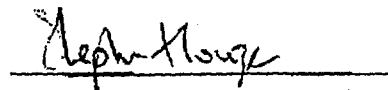
New level controls and stricter stock monitoring is been implemented in the MPI plant to ensure that no overflow can occur from the tallow storage tanks.

Conclusion.

The cause of the incident was a combination of a breach in the integrity of the bund when an old downpipe was broken at ground level. A subsequent spillage of tallow, although largely contained by the bund, contaminated the surface water system. The interceptor on the surface water system did the job it was designed for and ensured that no contamination entered the receiving water. The contamination was cleaned quickly and effectively. The sealing of the old pipe and the introduction of new controls on tallow stock taking will ensure that this occurrence will not happen again.

Signed

Stephen Houze
Environmental Manager



03/02/03

Photo No.2 illustrates the position after bund construction and prior to this incident. The downpipe was intercepted at the point shown and diverted away and out of the bund. The pipe was joined into the guttering system on the adjacent boiler system. The old down pipe was left in position as the pipe was sealed into the concrete on the floor of the bund.

Photo No. 3 shows this guttering system on the boiler house and the pipe from the MPI guttering.

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Appendix II-
**A list of householders affected by odour and noise from the
existing piggery and landfill**

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Crossabeg/ Killurin Local Environment Association

We the undersigned have suffered over the last 25 years, and are continuing to suffer from bad odours both from the dump, and from the adjoining piggery.

The odour from the dump since the capping has occurred has seen a noticeable improvement, but the odour from the piggery contrary to what the management of the pig farm would have us believe is totally unacceptable.

We can accurately predict the intensity of the odours, from the weather conditions, and time of the year.

We also know the routes which the odours take as they leave Killurin in summer, with little wind and high humidity, they will meander like a fog along the river.

Since these smells are not found at such levels in the vicinity of other piggeries, we can only conclude that the problem was one of location, it being situated in a valley on the bank of the river Slaney.

It would be considered a grave error of judgement to compound the errors of the past, by granting a licence for an increase in the number of pigs on site, and the granting of a licence for the erection of an anaerobic digester.

The smells emanating from the anaerobic digester will be a combination of

- Ammonia,
- Hydrogen Sulphide,
- Mercaptans
- Volatile fatty Acids,
- Fish waste
- Animal waste.

The granting of this licence is perceived as a further burden on the long suffering community, who have put up with unpleasant odours during the last 25 years.

Monica Walsh	Ballydickon
Alie Devine	Ballydickon
James Devine	"
Killy Devine	"
James Walsh James	"
Reg & Edna Rothwell	The Deeps Crossabeg
Marion O'Leary, Frances	The Deeps Crossabeg
Maurice Gordon	The Deeps Crossabeg
John FREEMAN	THE DEEPS CROSSABEG
Ann Kavanagh, Kiam Kavanagh	The Deeps Crossabeg

Jean & Ian Flinn ^{Riverside Cottage Ballycliff}
 J. Fox ^{The Deep}
 Paddy O'Leary ^{The Deep Crossabeg}
 Anita O'Leary ^{The Deep Crossabeg}
 Mary Kidd ^{Newtown Crossabeg}
 Marie Len Carey ^{DEPS Crossabeg}
 Michael Walsh ^{Ballycliff}
 Sue Walsh ["]
 Dave Walsh ["]
 Gary Ward ^{Widewater of Lave. Burn}

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Noise Emissions

We the undersigned strongly refute the statement on the EPA Licence Submission Section E.4 Noise Emissions Page 40 of 71 which states that "The activities currently on site do not generate noise levels that could be detected at site boundary".

The noise emanating from the existing equipment being used in the Pig Farm can be heard in the surrounding area. (See list of householders attached.)

We also note the following are not included in the EPA Licence submission;

- No background noise survey included
- No quantification of existing noise impact included
- No quantification of noise impact arising from the proposed development.

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Ann Kavanaugh	Ann Kavanaugh	The Deep Crossbeg
Olivia Devine	Ballydickon	
James Denne	"	
Lily Devine	"	
James Walsh	"	
Reg & Edith Pothwell	Ballydickon	
Charles Freeman	The Deep Crossbeg	
Maurice Jordan	The Deep Crossbeg	
Wendie Walsh	Ballydickon	
John Freeman	THE DEEP CROSSBEG	
John & Ian Filduff	Riverside Cottage Ballydickon	
Paddy O'Leary	The Deep Crossbeg	
Arlita O'Leary	The Deep Crossbeg	
Mary Kidd	Newtown Crossbeg	
Sue Walsh	Ballydickon	
Dave Walsh	"	
Mickal Walsh	"	
Mame Carley	DEEPS CROSSBEG	
Genny Walsh	Rippling Rylands	

Noise Emissions

We the undersigned strongly refute the statement on the EPA Licence Submission Section E.4 Noise Emissions Page 40 of 71 which states that "The activities currently on site do not generate noise levels that could be detected at site boundary".

The noise emanating from the existing equipment being used in the Pig Farm can be heard in the surrounding area. (See list of householders attached.)

We also note the following are not included in the EPA Licence submission;

- No background noise survey included
- No quantification of existing noise impact included
- No quantification of noise impact arising from the proposed development

Jackie Kelly
James Morrissey
Dorothy Kennedy
PAULINE LEONARD
PAUL LEONARD
MARY BARRON
BRIDGET BARRON
Joe Cashe
Mary Cashe
Eliane Cashe
Chris Cashe
PAUL BONNINGTON
JANE BONNINGTON
THOMAS BONNINGTON
ECHO BONNINGTON
Ger Power
Mason Power
Ger Power
Cepta Power
Sam Power
Dorothy Power

J J Doyle
Mary Doyle
James Doyle
Mildred Walsh
Ger Walsh
Sarah Walsh
Arlene Walsh
Cathy Walsh
Shane Walsh
Ollie Rafferty
Catherine Rafferty
Gibbie Rafferty
Edel Rafferty
Eoin Rafferty
Cori Rafferty
Kitty O'Leary
Mark Donohue
Julie Donohue
Andrew Corbett

Noise Emissions

We the undersigned strongly refute the statement on the EPA Licence Submission Section E.4 Noise Emissions Page 40 of 71 which states that "The activities currently on site do not generate noise levels that could be detected at site boundary".

The noise emanating from the existing equipment being used in the Pig Farm can be heard in the surrounding area. (See list of householders attached.)

We also note the following are not included in the EPA Licence submission;

- No background noise survey included
- No quantification of existing noise impact included
- No quantification of noise impact arising from the proposed development.

7 Randall

Bridget Scott

C Randall

Chris Corley

Melanie Murphy

Albert Randall

Catherine Randall

Lee Randall

Alanna Randall

A Lynell

Noel S. Dunne

Stephen Kelly

John Kelly

Edith Brennan

Maurice Brennan

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Noise Emissions

We the undersigned strongly refute the statement on the EPA Licence Submission Section E.4 Noise Emissions Page 40 of 71 which states that "The activities currently on site do not generate noise levels that could be detected at site boundary".

The noise emanating from the existing equipment being used in the Pig Farm can be heard in the surrounding area. (See list of householders attached.)

We also note the following are not included in the EPA Licence submission;

- No background noise survey included
- No quantification of existing noise impact included
- No quantification of noise impact arising from the proposed development.

John Dempsey John Dwyer
 Dennis Doyle - Betty Wilson
 Ann Donoghue Martin & Bill Wheeler
 J. Donoghue Terry White
 Roseanne
 John Dwyer
 Nick Donoghue
 Lora Roche
 Pat Cashin
 Dwyer
 Gal O'Neill
 Mary Wheeler
 Willie Wheeler

Appendix III -

Habitat Details of the Slaney Site

The site supports populations of several species listed on Annex II of the EU Habitats Directive including the three Lampreys - Sea Lamprey (*Petromyzon marinus*), River Lamprey (*Lampetra fluviatilis*) and Brook Lamprey (*Lampetra planeri*), Otter (*Lutra lutra*), Salmon (*Salmo salar*), small numbers of Freshwater Pearl Mussel (*Margaritifera margaritifera*) and in the tidal stretches, Twaité Shad (*Alosa fallax fallax*). A survey of the Derreen River in 1995 estimated the population of Freshwater Pearl Mussel at about 3,000 individuals. This is a significant population, especially in the context of eastern Ireland. The Slaney is primarily a spring salmon fishery and is regarded as one of the top rivers in Ireland for early spring fishing. The upper Slaney and tributary headwaters are very important for spawning.

The site supports important numbers of birds in winter. Little Egret are found annually along the river. This bird is only now beginning to gain a foothold in Ireland and the south-east appears to be its stronghold. Nationally important numbers of Black-tailed Godwit, Teal, Tufted Duck, Mute Swan, Little Grebe and Black-headed Gull are found along the estuarine stretch of the river. The mean of the maximum counts over four winters (1994/98) along the stretch between Enniscorthy and Ferrycarrig is: Little Egret (6), Golden Plover (6), Wigeon (139), Teal (429), Mallard (265), Tufted Duck (171), Lapwing (603), Shelduck (16), Black-tailed Godwit (93), Curlew (81), Red-breasted Merganser (11), Black-headed Gull (3030), Goldeneye (45), Oystercatcher (19), Redshank (65), Lesser Black-backed Gull (727), Herring Gull (179), Common Gull (67), Grey Heron (39), Mute Swan (259) and Little Grebe (17). Wexford Harbour provides extensive feeding grounds for wading birds and Little Terns, which are listed on Annex I of the E.U. Birds Directive have bred here in the past.

The Reed Warbler, which is a scarce breeding species in Ireland, is regularly found in Macmine Marshes but it is not known whether or not it breeds in the site. The Dipper also occurs on the river. This is a declining species nationally.

- The site supports many of the mammal species occurring in Ireland. Those which are listed in the Irish Red Data Book include Pine Marten, Badger, Irish Hare and Daubenton's Bat. Common Frog (*Rana temporaria*), another Red Data Book species, also occurs within the site.

Further south of Macmine are expanses of intertidal mudflats and sandflats and shingly shore often fringed with a narrow band of salt marsh and brackish vegetation. Narrow shingle beaches up to 10 m wide occur in places along the river banks and are exposed at low tide. Upslope the shingle is sometimes colonised by Saltmarsh Rush (*Juncus gerardi*), Townsend's Cord-grass (*Spartina townsendii*), Common Saltmarsh-grass (*Puccinellia maritima*), Sea Aster (*Aster tripolium*), Hemlock Water-dropwort (*Oenanthe crocata*) and Himalayan Balsam (*Impatiens glandulifera*).

The site is a candidate SAC selected for alluvial wet woodlands, a priority habitat on Annex I of the E.U. Habitats Directive. The site is also selected as a candidate SAC for floating river vegetation, estuaries, tidal mudflats and old oak woodlands, all habitats listed on Annex I of the E.U. Habitats Directive. The site is further selected for the following species listed on Annex II of the same directive - Sea Lamprey, River Lamprey, Brook Lamprey, Freshwater Pearl Mussel, Twaite Shad, Atlantic Salmon and Otter.

Floating river vegetation is found along much of the freshwater stretches within the site. Species present here include Pond Water-crowfoot (*Ranunculus peltatus*), Water-crowfoot (*Ranunculus* spp.), Canadian Pondweed (*Elodea canadensis*), Broad-leaved Pondweed (*Potamogeton natans*), Water Milfoil (*Myriophyllum* spp.), Common Club-rush (*Scirpus lacustris*), Water-starwort (*Callitriche* spp.), Hemlock Water-dropwort, Fine-leaved Water-dropwort (*Oenanthe aquatica*), Common Duckweed (*Lemna minor*), Yellow Water-lily (*Nuphar lutea*), Unbranched Bur-reed (*Sparganium emersum*) and the moss *Fontinalis antipyretica*. Two rare aquatic plant species have been recorded in this site: Short-leaved Water-starwort (*Callitriche truncata*), a very rare, small aquatic herb found nowhere else in Ireland; and Opposite-leaved Pondweed (*Groenlandia densa*), a species that is legally protected under the Flora Protection Order, 1999.

Good examples of wet woodland are found associated with Macmine marshes, along banks of the Slaney and its tributaries and within reed swamps. Grey Willow (*Salix cinerea*) scrub and pockets of wet woodland dominated by Alder (*Alnus glutinosa*) have become established in places. Ash (*Fraxinus excelsior*) and Birch (*Betula pubescens*) are common in the latter and the ground flora is typical of wet woodland with Meadowsweet (*Filipendula ulmaria*), Angelica (*Angelica sylvestris*), Yellow Iris, Horsetail (*Equisetum* spp.) and occasional tussocks of Greater Tussock-sedge (*Carex paniculata*). These woodlands have been described as two types: one is quite eutrophic, is dominated by Willow and is subject to a tidal influence. The other is flushed or spring-fed subject to waterlogging but not to flooding and is dominated by Alder and Ash.

The shrub layer is well-developed with Hazel (*Corylus avellana*) and Holly (*Ilex aquifolium*) occurring. The ground layer consists of Great Wood-rush (*Luzula sylvatica*) and Bilberry (*Vaccinium myrtillus*), with some Bracken (*Pteridium aquilinum*) and Brambles (*Rubus fruticosus* agg.). Herbaceous species in the ground layer include Primrose (*Primula vulgaris*), Wood-sorrel (*Oxalis acetosella*), Common Cow-wheat (*Melampyrum pratense*) and Bluebell (*Hyacinthoides non-scripta*). Many of the trees carry an epiphytic flora of mosses, Polypody Fern (*Polypodium vulgare*), and lichens such as *Usnea comosa*, *Evernia prunastri*, *Ramalina* spp. and *Parmelia* spp.

Below Enniscorthy there are several areas of woodland with a mixed canopy of Oak, Beech, Sycamore (*Acer pseudoplatanus*), Ash and generally a good diverse ground flora. Near the mouth of the river at Ferrycarrig is a steep south facing slope covered with Oak woodland. Holly and Hazel are the main species in the shrub layer and a species-rich ground flora typical of this type of Oak woodland has abundant ferns - *Dryopteris filix-mas*, *Polystichum setiferum*, *Phyllitis scolopendrium* - and mosses - *Thuidium tamariscinum*, *Mnium hornum*, *Eurynchium praelongum*.

Other habitats present within the site include species-rich marsh in which sedges such as *Carex disticha*, *Carex riparia* and *Carex vesicaria* are common. Among the other species found in this habitat are Yellow Iris (*Iris pseudacorus*), Water Mint (*Mentha aquatica*), Purple Loosestrife (*Lythrum salicaria*) and Soft Rush (*Juncus effusus*). Extensive marshes occur to the west of Casltebridge associated with the tidal areas of the River Sow.

Agriculture is the main landuse. Arable crops are important. Improved grassland and silage account for much of the remainder. The spreading of slurry and fertiliser poses a threat to the water quality of this salmonid river and to the populations of Annex II animal species within it. Run-off is undoubtedly occurring, as some of the fields slope steeply directly to the river bank. In addition, cattle have access to the site in places. Fishing is a main tourist attraction along stretches of the Slaney and its tributaries and there are a number of Angler Associations, some with a number of beats. Fishing stands and styles have been erected in places. Both commercial and leisure fishing takes place. There are some gravel pits along the river below Bunclody and many of these are active. There is a large landfill site adjacent to the river close to Hacketstown and at Killurin. Boating, bait-digging and fishing occur in parts of Wexford Harbour.

Waste water outflows, runoff from intensive agricultural enterprises, a meat factory at Clohamon and a landfill site adjacent to the river and further industrial development upstream in Enniscorthy and in other towns could all have potential adverse impacts on the water quality unless they are carefully managed. The spread of exotic species is reducing the quality of the woodlands.

The site supports populations of several species listed on Annex II of the EU Habitats Directive, and habitats listed on Annex I of this directive, as well as important numbers of wintering wildfowl including some species listed on Annex I of the EU Birds Directive. The presence of wet and broad-leaved woodlands increases the overall habitat diversity and the occurrence of a number of Red Data Book plant and animal species adds further importance to the Slaney River site.

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Appendix IV

A list of objectors to planning permission number
20050055

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We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Gary Ward	KILPATRICK GLEBE CROSSABEG.
Iain Nash	Kilpatrick Glebe, Crossabeg
John Kehoe	Kyle Upper - Crossabeg - Co. Wexford
Peter Ryan	Kyle Upper Crossabeg Co. Wexford
Robert Corish	Kyle Upper, Crossabeg, Co. Wexford.
Graham Corish	Kyle Upper Crossabeg Co. Wexford
Martin Lohan	Kyle upper crossabeg CO- Wex
Marlyn Duff	Kyle Crossabeg, Wexford -
S. Keenan	Kyle Crossabeg Co. Wexford
Dorcas Maher	Kyle upper CROSSABEG, Wex
Ken Maher	Kyle Crossabeg Wexford
John O'Connor	Ballydicken upper Kyle CROSSABEG
Berni O'Connor	Ballydicken Upper Kyle Crossabeg Co. Wexford.
Fiona O'Connor	Ballydicken, Kyle Upper, Crossabeg, Co. Wexford
Viv J. Doherty	Coolcalt's Wexford
Kimelda Doyle	Coolcalt's Wexford.
Louise Sullivan	Kyle upper, crossabeg, Wexford.
Vivian Sullivan	KYLE UPPER CROSSABEG, Wexford.
Anna Sullivan	Kyle Upper Crossabeg Wex

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Lawrence Smith	13 Clonmore Upper Wicklow
Neil Doyle	Garrywilliam Crossabeg
M. V. V. V.	Long Crossabeg
Darragh O'Reilly	Cross upper Crossabeg
Bridget Doyle	Garry William Crossabeg
Matt Doyle	Garry William Crossabeg
M Hayes	Crossabeg
Gr. Buckley	Crossabeg
L. J. Buckley	Ballyreagan Crossabeg
Melina Carley	Crossabeg
Joan O'Leary	Crossabeg
James Quinn	Crossabeg
Paddy Carley	Crossabeg
Rose Karagh	Bantown
Seán Karagh	Bantown
Margaret Carley	Crossabeg
M Ennis	
Sheila Quinn	Crossabeg
Kathleen Hayes	Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Paul Murphy	"Sunny-Dek" Newcastle Upper, Crossabeg.
Catherine Murphy	SUNNY-DEK NEWCASTLE upper CROSSABEG.
Peggy. Connolly	NEW CASTLE
SEAN PURCELL =	
Clare =	=
N. Sinnott	Newcastle
Shirley Roche	Newcastle
James Roche	Newcastle
Kyle Roche	Newcastle
Mike Mythen	
Maive Mythen	
Lyndal McArthur	Crossabeg
John Walsh	"
May McArthur Walsh	"
David Connolly	CROSSABEG.
Laura Halpin	Crossabeg
Michael Halpin	Crossabeg
Maureen	Crossabeg
Eileen Coughlan	Crossabeg.

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Brendan Roche	Ballyharron Crossabeg.
Michelle Roche	Ballyharron, Crossabeg.
Tom Bernick	Newcastle Upper, Crossabeg
Valerie Bernick	Newcastle Upper, Crossabeg.
Sue & M. Frithamher	THISTLE DOWRY, KILLOWEN CROSSABEG, CO. WEXFORD.
Violet Doyle	Three Red Bungalow KILLOWEN Crossabeg.
Pat Dooley	16 Walnut Grove Wexford.
Stasia Clancy	16 Walnut Grove Wexford.
Maureen Drish	Newcastle Upper, Crossabeg Wexford
Thomas Grah	Newcastle Upper, Crossabeg Wexford
Gerard O'Neil	KILLOWEN, CROSSABEG, Co. WEXFORD.
Stasia O'Reilly	KILLOWEN CROSSABEG, Co WEXFORD
David Gayer	Kilbowen Crossabeg, Co. Wexford
Ruth Fox	Kilbowen Crossabeg Co. Wexford
Mary Fox	Crossabeg Co. Wexford
Paul Kinsell	Kilbowen, Crossabeg Co. Wexford
John Doyle	The Red Bungalow KILLOWEN Crossabeg.
Ann Meagher	Newcastle Upper, Crossabeg
John Meagher	Newcastle Upper, Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Jeon Cloney	Kereight Cross
Martin O'Connor	KILPATRICK KYLE UPPER CROSSABEG
Mark O'Connor	KILPATRICK KYLE, CROSSABEG
Dorothy O'Connor	Kilpatrick, Kyle, Crossabeg
J GRAHAM	KILPATRICK KYLE
A Edmund	KILPATRICK KYLE CROSSABEG
FINTON Lacey	UPPER KYLE CROSSABEG
KEVIN McDELMON	KYLE - CROSSABEG
Paddy Fox	Kyle upper, Crossabeg
Kere Fox	Kyle Upper Crossabeg
Lacey Kelly	Kyle Upper Crossabeg
Tony Bernie	Kyle upper Crossabeg
Tom Corish	Kyle Upper, Crossabeg
Tony Corish	Kyle Upper, Crossabeg
NO. KERRAN	Kyle, Crossabeg
SOADY	ALLEN EWARD KYLE X
SOADY	ALBERT EWARD KYLE X
Kevin Forde	Kyle upper, Crossabeg
Paul Forde	Kyle upper, Crossabeg
Romay Forde	Kyle upper, Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Jimmy & Monica Walsh	Ballyduken Crossabeg
Michael Walsh	Ballyduken Crossabeg
David Walsh	Ballyduken Crossabeg
Sue Walsh	Ballyduken Crossabeg
Marie Dillon	Kyle Crossabeg
Tom Devine	Ballyduken Crossabeg
Allie Devine	Ballyduken Crossabeg
Lily Devine	Ballyduken Crossabeg
Collette O'Brien	Ballyduken Crossabeg
Pete O'Brien	Ballyduken Crossabeg
John & Joan Flanagan	Ballyduken Crossabeg
Dennis Hean	Woodcock Hollow Ballyduken Crossabeg
Noeline Culleton	Moat Park Ballyduken Crossabeg
Eamon Culleton	Moat Park Ballyduken Crossabeg
Lisa Quicke	Kyle Crossabeg
Idel Quicke	Kyle Crossabeg
Tom Hall	Kyle Crossabeg
Paddy Quicke	Kyle Crossabeg
Patrick Kehoe	Newton Crossabeg
Freda Kehoe	Newton Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Frank Carley	Newcastle upper Crossabeg
Margaret Carley	Newcastle upper Crossabeg
Jenna Carley	Newcastle Upper Crossabeg
Daniel Carley	Newcastle upper Crossabeg
Jillian Roche	Ballyharron Crossabeg wexford.
Alan Roche	Newcastle Crossabeg.
Vicky Roche	Newcastle Crossabeg.
Emer Carley	Newcastle Crossabeg
Stephen Carley	Newcastle Crossabeg.
Veronica Roche	Newcastle Crossabeg
Aidan Roche	Newcastle Crossabeg
Des Kinsella	Killowen Crossabeg
Kieran Donohue	Killowen Crossabeg
Michael Donohue	Killowen Crossabeg.
Clifford Donohue	Killowen Crossabeg
Carl Donohue	Killowen Crossabeg
Hanna Donohue	Killowen Crossabeg.
NATALIE NOLAN	NEWCASTLE CROSSABEG.
VANESSA NOLAN	NEWCASTLE CROSSABEG

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Lois O'Brien	Kyle Upper, Crossabeg
Michael O'Brien	Kyle Upper, Crossabeg
John Kehue	Kilpatrick Crossabeg
John Kehue	" "
John E. Kehue	Kyle Crossabeg
John Culhane	Kyle Crossabeg
Miriam O'Connor	Kyle Crossabeg
Sileen O'Leary	Newtown Crossabeg
J. Freeman	THE DEEPS, CROSSABEG CO. WEXFORD
M. Gordon	THE DEEPS CROSSABEG CO WEXFORD
Michael Gordon	THE DEEPS, Crossabeg Co Wexford
Hannah Gordon	THE DEEPS Crossabeg Co Wexford
Eoin Gordon	THE DEEPS Crossabeg Co Wexford
Aimee Gordon	THE DEEPS, Crossabeg, Co Wexford
John Freeman	THE DEEPS Crossabeg Co Wexford
Yara Freeman	THE DEEPS, Crossabeg, Co Wexford
Anne Freeman	THE DEEPS Crossabeg Co Wexford

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
PATRICK NOLAN	NEWCASTLE CROSSABEG
MARIA NOLAN	NEWCASTLE CROSSABEG
James Raydon	Killowen Crossabeg.
Catrina Corish	Newcastle, Crossabeg
John Holohan	Crossabeg
Agnes Holohan	Crossabeg.
Michael Holohan	Crossabeg
Shane Holohan	Crossabeg
Jim Kelly	Crossabeg
Sam Kelly	Crossabeg
Brian Kelly	Crossabeg
Guadalupe Kelly	Killowen Crossabeg
Pedro Kelly	" "
John Walsh	Ferryway, Crosby
Donna Marie	
Donna McDonald	Saunderscourt Crossabeg.
Eoin McDonald	Saunderscourt Crossabeg
Aoife McDonald	Saunderscourt, Crossabeg
Jenny Mc KERNAN	Bayfield HOUSE SAUNDERSCOURT.

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Maura Kearns	Kereight Crossabeg
Pat Kearns	Kereight Crossabeg
Margaret McGargle	Kereight "
Patricia McGargle	Kereight "
Deanna Kehoe	Kereight "
Gibbhan Kehoe	Kereight "
Seán Kehoe	Kereight "
Niall Gormley	Kereight Crossabeg
Maire Breen	Newcastle Crossabeg
David Curley	Newcastle Crossabeg
Mo O'Shea	Newcastle Upper, Crossabeg
Frank Whitty	Newcastle Upper Crossabeg
Nicky Whitty	Newcastle upper Crossabeg
Patricia Whitty	Newcastle upper Crossabeg
Veraica Donaghy	Newcastle Crossabeg
Bobby Kennedy	" "
Laora Kennedy	Newcastle, Crossabeg
Declan Horne	" "
Haven Maddock	Newcastle Up, Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Ken Foley	CROSSABEG.
Michael Murphy	Bachelors Hall
James Dwyer	CROSSABEG
MICHAEL MURPHY	CROSSABEG
John Quinn	Newcastle, Crossabeg
Mary Doyle	Wexford Town
Deirdre Doyle	Wexford town
John Doyle	97 Bedeane Lane Wexford
Tom Doyle	112 Loughmellows PP Wexford
Sandra Beaney	Crossabeg.
Jim Jordan	Lacken, Ballyhale
Dani Lambert	Lacken Ballyhale
Garrett Laffan	Monmore Crossabeg
Michael Doyle	Newcastle Crossabeg
James O'Keefe	Kilbarrin
Wesley Holton	Kilbarne.
Mary O'Connor	Kyle Crossabeg
Peader O'Connor	Oaklands Park Crossabeg.
Des Healy	Crossabeg

We the undersigned, object to the granting of planning permission to develop a major industrial waste disposal complex, for the disposal of animal offal, industrial, and commercial waste.

NAME	ADDRESS
Bue Carr	Newcastle Upper, Crossabeg
Kate McGarr	ditto
K. McKeown	ditto
Queen/Kearney	ditto
Cyril Keenan	ditto
Ed Keenan	Saunderscount Horse Crossabeg
Ballyhannon	Saunderscount Horse Crossabeg
Elizabeth Carroll	Saunderscount Crossabeg
Gerda McKeown	Saunderscount Crossabeg
Michael Goggin	Ballyhannon upper
Myra Goggin	" "
P. S. Cully	Ballyhannon upper Crossabeg
Julie Butler	Ballyhannon Crossabeg
Marty Butler	BALLYHANNON CROSSABEG
MARTIN Furlong	BALLYHANNON "
Ann Furlong	" " "
Therese Furlong	" " "
MARY D. FERRY	" " "

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NAME	ADDRESS
Lathema Dixon	Kyle Crossabeg Co Wexford.
Jim Dixon	Kyle Crossabeg.
Mairiad Dixon	Kyle Crossabeg.
James J. Dixon	Lonsdale, Kyle, Crossabeg.
Bridie J. Donald	Lonsdale, Kyle, Crossabeg.
Pas & Brenda	Lonsdale Crossabeg
Elaine Griffiths	Lonsdale Crossabeg
Barbara Allen	KYLE, CROSSABEG
Bernie Kelly	Kyle Crossabeg.
Gary Fature	Tykehill Cottage, Crossabeg.
Phil Fortune	Tykehill Cottage Crossabeg.
Mary Nash	Tykehill, Crossabeg.

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NAME	ADDRESS
Julie Sullivan	Kyle, Crossabeg, Wexford.
Robert [Signature]	Kilpatrick, Crossabeg
John G. [Signature]	KYLE CROSSABEG
Joe Wilson	KYLE UPPER CROSSABEG.
Margaret Wilson	Kyle upper crossabeg.
Charmaine Wilson	Kyle upper crossabeg.
Margaret [Signature]	Kyle CROSSABEG
Don [Signature]	_____
Tom Sullivan	Kyle UPPER, Crossabeg
Jeff Moloney	Leix Rell Kyle Crossabeg
Siobhán O'Connor	Kyle, Crossabeg
Peter O'Connor	Kyle Crossabeg
May O'CONNOR	Kyle Crossabeg
[Signature]	Stormalier Common
Kathryn Gilligan	Marmore Crossabeg
Margaret Davenport	KILPATRICK, KYLE, CROSSABEG.
Rosie O'Connell	Kilpatrick, Kyle, Crossabeg.

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NAME	ADDRESS
Kathleen Roche	Ballynarran Crossabeg
Kate Fanning	Sandowood Crossabeg
John Dwyer	Newcastle Crossabeg
Una Goan	Newcastle Upper Crossabeg
T.B. O'Leary	Newcastle Upper, Crossabeg
John Sinnott	Newcastle Crossabeg
Phil Sinnott	NEWCASTLE CROSSABEG
Peggy Rossiter	Newcastle Crossabeg
Joseph Rosser	Newcastle Crossabeg Co. Wexford
James Quinn	Ballyharron Crossabeg Wexford
Sheila Quinn	Ballyharron Crossabeg
Sheila Ormonde	" "
Mary Quinn	" "
Des Quinn	CROSSABEG Co. Wexford
W. Quinn	Ballyharron Crossabeg
Conor Quinn	Crossabeg, Co. Wexford.
Margaret Arley	Ferryman's Racing Club.
Samuel Arley	" " "
Victor Bridges	Ferryman's Racing Club.

Ballyhardan Ura

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[illegible]

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[illegible]

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NAME	ADDRESS
Sam Waddell	Newcastle Upper Crossabeg
Robert Lomlet	Newcastle Crossabeg
Mary Lomlet	Newcastle Crossabeg
Maire Jane	" "
Mr. Harry Quinn	Newcastle Crossabeg
Anthony Quinn	NEWCASTLE Crossabeg
Andrew Quinn	Newcastle Crossabeg
Michael Smith	NEWCASTLE UPPER CROSSABEG
Michael Doyle	Newcastle Crossabeg
MARIE RYAN	Ballyharron Crossabeg