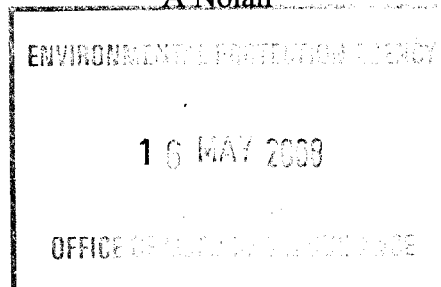


Kildare
County Council
Comhairle Contae
Chill Dara

15/05/2008

Environment
A Nolan

Office of Climate, Licensing & Resource Use,
Environmental Protection Agency,
McCumisky House,
Richview,
Clonskeagh Rd.,
Dublin 14.



Re/ The Queally Group\Arrow Group, Maudlins Industrial Estate, Naas

Dear Dr. Murnane,

Kildare County Council have received correspondence from the Arrow Group in relation to the Proposed Determination on their IPPC Licence (see attached). The Group has requested that their discharge limits are increased until June 2009 to allow them to construct and commission a new effluent treatment plant.

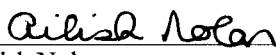
The table below outlines their request, the limits on the PD and the limits on their existing Section 16 trade effluent discharge licence:

Parameter	Limits on PD (mg/l)	Requested Limits (mg/l)	Section 16 Limits (mg/l)
Temperature	43	43	43
pH	6-9	6-9	6-9
BOD	400	900	500
COD	760	1500	900
Suspended Solids	600	1000	400
Ammonia (as N)	70	100	40
Total Phosphorus (as P)	20	100	20
Orthophosphate (as P)	15	80	Not Indicated
OFG	10	10	100

At present Osberstown WWTP is overloaded on all aspects of the design (see attached comment from Water Services). Therefore, there is no scope to accept any additional loading.

Kildare County Council are willing to accommodate the Group by allowing them to discharge at the concentrations, as specified on their existing Section 16 trade effluent discharge licence until 1st June 2009, at which stage the limits specified in Section 99(E) of the Sanitary Authority conditions should be enforced.

If you have any queries in relation to the above, please contact Ailish Nolan at 045-980579.


Ailish Nolan
Assistant Environmental Scientist
Environment Section

Dawn Farm Foods
Dawn Fresh Foods
Dawn Meats
Dawn Pork & Bacon
Q K Cold Stores
Q K Management Services
Queally Farms
South Eastern Enterprises

- ☐ The Maudlins, Naas, Co. Kildare, Ireland.
Tel: 353-45-871115, Fax: 353-45-871124
- ☐ Gardenmorris, Kill, Co. Waterford, Ireland.
Tel: 353-51-292144, Fax: 353-51-292330
email: queally@queallygrp.com

Ailish Nolan,
Environment Section,
Kildare County Council,
St.Mary's,
Naas,
Co. Kildare

8th May 2008

**Re: Provisional Change of Licence Limits For Waste Water Discharge at the
Queally Group Facility, Maudlins Industrial Estate, Naas, Co Kildare.**

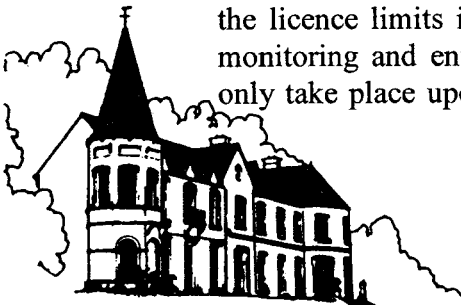
Dear Ailish,

The EPA have recently written to us in relation to our objection to the limits specified in the proposed determination for emissions to sewer. We requested interim limits to be imposed until such time as the new wastewater treatment facility was built. Please see attached letter from the Agency.

As you are already aware, we have continually had problems staying within the discharge limits for several of the current licence parameters. The cooked meats operations undertaken by several of the factories on site mean that the nature and quality of the wastewaters generated are constantly changing. Year on year, we have also increased our overall production capacity. Due to this increased production and limitations of our existing treatment plant, we have submitted plans to build a new state of the art wastewater treatment facility to Naas Town Council.

This facility, when completed, will be able to bring our wastewaters generated on site well within the new licence limits, which you submitted to the EPA during the application process. We have made provision for large balancing and aeration tanks which will allow for a greatly increased retention time of the effluent within the plant. We would therefore expect to discharge to the local authority sewer a much lower flow rate of approximately 25 m³ per hour, 7 days a week as opposed to the current flow rate of 40 m³ per hour at intermittent time periods during times of production.

The EPA have already issued us with a proposed determination in relation to the granting of an IPPC licence for the entire site. We were entitled to make objections to any conditions contained within this document as we saw fit. One such issue to which we objected was the licence limits for emissions to sewer, which required us to meet the licence limits immediately upon date of grant of licence. We proposed that the monitoring and enforcement of the *new* limits on our wastewater discharge should only take place upon completion of the new wastewater treatment facility as we are



constantly in breach of the current discharge limits hence the requirement to build the new wastewater treatment facility.

The EPA have stated that they do not have the authority to amend the discharge limits agreed by the Water Services Authority and they suggested that we approach Naas Town Council to request a provisional review of our licence limits to enable us to avoid a situation of re-occurring non compliances with our forthcoming IPPC licence.

As you can probably understand from your own dealings with the EPA, The Group would be quite keen not to get off on the wrong foot with the EPA at such an early stage. I would like to therefore request from you a provisional increase for the parameters on our wastewater discharge licence. I would propose that this new "provisional" discharge licence expire on the 1st of June 2009. Please see table below for new discharge limits proposed by us:

Parameter	Limits for New Treatment Plant in IPPC Licence mg/l	Current Discharge Licence Limits mg/l	Provisonal Limits requested mg/l
Temperature	43	43	43
pH	6-9	6-9	6-9
BOD	400	500	900
COD	760	900	1500
Suspended Solids	600	400	1000
Ammonia (as N)	70	40	100
Total Phosphorous (as P)	20	20	100
Ortho-Phosphate (as P)	15	15	80
Oils, Fats and Greases	10	100	10

We have made a lot of progress in the last year in reducing the overall volumetric flow through our wastewater treatment plant. This has been made possible by the procurement of new meat cooking technologies. Two of our new systems use significantly less water in their operations. We also initiated several water usage reduction projects which have seen us reduce the overall amount of water used in wash downs and other processes.

Typically, we are discharging in the region of 650 – 700 m³ per day to the council sewer system. This is over a five day week when production occurs. When taking an average over the full seven days, the daily amount discharged to the council is approximately 500m³ per day. This is significantly lower than the 800 m³ as currently stated in our discharge licence.

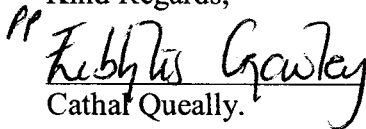
I would hope that you will take into consideration our reduced volumetric flows when examining our request. If we take the example of the BOD request increase and

the reduced volumetric flow, then by our calculations, the overall loading to the Osberstown treatment plant is 12.5 % higher in our new licence request.

In the interim period, whilst we are awaiting approval for our new treatment plant, we will do our utmost to ensure that we treat our wastewaters to the best of our current abilities and furnish you with the results accordingly. We are confident that upon completion of the new wastewater treatment plant that the wastewater discharge will meet the new limits already outlined in the proposed determination.

Please note that we need to respond to the Agency by the 26th May so we would appreciate it if you could treat this as a matter of urgency. I would like to thank you in advance for your assistance with this matter.

Kind Regards,

PP 

Cathal Queally.
Environmental Manager
The Queally Group.

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Eibhlís Crowley
Environmental Officer
Arrow Group
The Maudlins Industrial Estate
Naas
Co. Kildare

Regional Inspectorate
McCumiskey House, Richview,
Clonskeagh Road, Dublin 14, Ireland
Cigireacht Réigiúnach, Teach Mhic Chumascaigh
Dea-Radharc, Bóthar Cluain Sceach
Baile Átha Cliath 14, Éire
T: +353 1 268 0100
F: +353 1 268 0199
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

25 April 2008

Reg. No. P0812-01

Notice in accordance with Article 32 of the EPA (Licensing) Regulations 1994 to 2004

Dear Ms Crowley

I write in relation to your objection to the Proposed Determination (PD) issued to Arrow Group, Reg. No. P0812-01, on 15/02/2008.

Further information is required to be submitted in relation to the objection, as follows:

Schedule B Licence Limits for Emissions to Sewer

It is noted that you have objected to the limits specified in the Proposed Determination for emissions to sewer, stating that the limits cannot be met until the new treatment plant is in place, and requesting interim limits to be imposed until the new plant is operational.

In relation to this matter, the Agency does not have the authority to include limits in the IPPC licence which are in excess of those agreed by the Water Services Authority. The limits specified in the IPPC licence are based on those detailed in the Section 99E reply submitted by the Water Services Authority. Therefore, in order to increase the limits included in the licence, approval must be received from the Water Services Authority. It is therefore recommended that you discuss your requirements with the Water Services Authority and in the event that an agreement to increase the limits is reached, submit written details of any agreement to the Agency as soon as possible. I would ask that any agreement from the Water Services Authority be provided in writing by the Authority directly to the Agency.

It is recommended that discussions with the Water Services Authority commence as soon as possible. The Agency requests a response within **4 weeks** of the date of receipt of this notice.

Failing any agreement from the Water Services Authority, the Agency will be required to issue the licence with the licence limits as currently included in the Proposed Determination.

Yours sincerely,



Dr. Ian Marnane
Office of Climate, Licensing and Resource Use

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Ailish Nolan - [Possible Spam] Interim increase to discharge limits for QK, Queally Group

From: Fergal Cronin <fcronin@osberstowntw.ie>
To: Ailish Nolan <Ainoln@kildarecoco.ie>
Date: 13/05/08 12:08
Subject: [Possible Spam] Interim increase to discharge limits for QK, Queally Group
CC: "Tom Tinsley (SEE)" <Ttinsley@kildarecoco.ie>
Attachments: Osberstown 1st Quarter Report 2008.pdf

Ailish,

Attached please find the 2008 Q1 report for the Osberstown WWTP. As you can see the Plant is overloaded on all aspects of the design loading with the exception of a little leeway for Total Phosphorus. There should be no more increases or allowed discharges to the system until either the Stage III upgrade is complete in 2012 or some form of "loading trading" is entered into with existing licensees.

They state in their letter of the 8th May that they are "*continually having problems*" – and it is obvious that they are a major contributor to the Osberstown Plant struggling so badly. From the Final Effluent Data below even on the 50%-ile basis the Plant is exceeding its design discharge target.

I understand it is only a temporary increase (to June 2009) but there is no real scope for accepting additional loading of any sort. The only ray of light is that the consultants, Barry & Partners for the Stage III upgrade, are proposing some short term improvement measures but it could be a year before they kick in or are even recognisable as having worked. Consequently, it may be possible to allow the Total Phosphorus increases – we may just get away with in. I'm trying to accommodate Queally Group and you here but, on the ground, we are struggling to cope big time. If you want another decision on this please talk to Tom Tinsley.

Regards,

Fergal Cronin
 Plant Manager

Final Effluent Data (from data to be submitted to the EPA as part of our licence application)

Parameter	Units	Stage II Design	Percentile	2006 - 2007*
Flow	m3/day	20,000	50	26,943
			95	38,662
BOD	kg/day	300	50	130
			95	714
COD	kg/day	2,500	50	1,220
			95	4,655
SS	kg/day	700	50	694
			95	4,266
Total P	kg P/day	18	50	19
			95	66.4
TKN	kg N/day	99	50	51
			95	609
Oxidised Nitrogen	Kg N/day	401	50	183
			95	298
Ammonia	Kg N/day	n/a	50	24
			95	408

Parameter	Units	Stage II Design	Percentile	2006 - 2007*
Flow	m3/day	20,000	50	26,943
BOD	mg/l	10	50	4
		15	95	26

COD	mg/l	125	95	153
SS	mg/l	35	95	139
Total P	mg/l P	0.35	50	0.7
		0.9	95	2.6
TKN	mg/l N	5	95	4.8
Oxidised Nitrogen	mg/l N	20	95	10.6
Ammonia	mg/l N	(0.9)	50	0.9
		(1.5)	95	17.5

*50 and 95%-ile data relates to the 12 month period of November 2006 to October 2007

Osberstown WWTP
Kildare County Council
Naas
Co. Kildare
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www.osberstowntw.ie

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