

Poolboy Community Development CouncilNovember 1st, 2009

EPA Licensing Section
Johnstown Castle
Co. Wexford

Re: Submission on IPPC Licence review application of Premier Proteins (2000) Ltd.
Ref: P0045-06

Dear Sir/Madam,

In relation to the above application the Poolboy Community Development Council an umbrella group representing the residents and residents associations from south of Ballinasloe town, formally raise an objection to the renewal and issuance of a new IPPC licence to Premier Proteins (2000) Ltd.

Following a review of this new application, together with the conditions required prior to issuance of the licence, the following have been identified as significant issues to be considered when contemplating a licence renewal.

Condition 5.5 – To ensure all air emissions from the tallow, blood and waste water are vented to suitable odour abatement plant. *The effectiveness of these abatement systems are questionable? (See Joe Hunter RPS report)*

Condition 6.1 - Test programme from thermal oxidiser (to be completed on Sept 3rd 2009, however, the letter is dated Sept 9th 2009. *Has this been carried out?*

Condition 6.2 - Test programme for the WWTP system are in progress. *Key tests and monitoring is required on this critical process in the production cycle.*

Condition 8.28 – Quantity of material accepted. – The current licence states “the quantity of animal by products and other wastes should not exceed 480 tonnes on any one day” The licensee has requested an unlimited volume of liquid waste processing and that the daily 480 tonne intake limit relate just to rendering/ cooking solid materials (Animals), as that is the cooker capacity. The Licensee has stated the capacity of the Liquid waste intake will be determined by the capacity of the WWTP. (290m³ per day). We vehemently object to this amendment. The current 480 tonne daily all materials and liquids intake limit should not be changed. Increased capacity should not be permitted at this facility.

Proposed Amendment to schedule C4 Waste monitoring- The licensee is requesting to change the frequency of the monitoring from per consignment to per supplier. Again, this amendment is not satisfactory. If anything increased monitoring is required. The question is, if the values are high (greater than 1000mg of OFG and greater than 25,000 of COD), will the operator managing the WWTP report this to the EPA? If the PH sample is out of the range of 5 to 9.5 will further investigation be carried out? and will the grease trap water be quarantined or simply discharged into the river?

In the letter from Helen Boyce, office of the environmental enforcement dated June 24th 2009, in response to the licensee's letter on Used cooking oils and Sludge treatment, she replied that both waste streams will still require treatment by rendering (cooking) and that sludge should not exceed 10% of the processing capacity.

Acceptance & Processing of blood – Changes to increase the times to permit 24 hour processing are not encouraging to the local community. The company operates in an urban with an increasing number of residential developments close to the site. Both Oak glen & Canalach developments are close and due to their location in a hollow, the fugitive malodorous emissions become trapped and stagnant. Despite the convictions of the licensee that loading is been carried out within a negative pressure building through a closed pipe into a tank vented to Bio-filter 1, still does not give us grounds to feel anymore reassured that toxic malodorous emissions will not occur during processing. *Negative pressure might be a concept they do not understand in Premier Proteins.*

According to the blood management plan, once grease trap waste enters the WWTP there is a minimum 15.2 days required as this is the shortest possible residence time in the aeration basin. *Is the WWTP of adequate capacity to allow 24 hour production, considering grease trap waste requires a minimum of two weeks to ferment before discharge to the river? The existing WWTP can only discharge 290m3 per day, will this result in unwarranted & untreated discharges to the river?*

BSE Positive Materials – It is not explicitly included or defined under Category 1 of accepted materials. EU legislation EC 1774/2002 requires in essence the incineration of all SRM materials to ash.

Article 2 The scientific steering committees main conclusion is that animal by products derived from animals not fit for human consumption following health inspection should not enter the food chain.

Article 7 Scientific advice suggests that the practice of feeding an animal species with proteins derived from the bodies of the same species presents a risk of spreading disease.

Article 8 Catering waste containing products of animal origin can be a vector for the spread of a disease.

Article 10 To avoid any risk or dispersal of pathogens and/or residues, animal by products should be processed, stored and kept in an approved supervised plant.

This would mean that the BSE animal should not enter with other animals in the production process, as it increases the risks of spreading disease, cross contamination and the chances of eventually entering the “dog food chain” are heightened if stringent controls are not in place to cater separately for this minority high risk material category. *The question is can we entrust Premier Proteins to carry out this task with the due care and diligence it requires?*

The following are the existing waste streams the licensee currently operates:

- Wastes from preparation and processing of meat , fish & other foods of animal origin
- Wastes from fruit, vegetables, foods etc
- Wastes from baking & confectionary
- Biodegradable kitchen & canteen waste
- Sludges from treatment of urban waste water
- Waste edible oil & fat
- Grease trap waste

Some of the proposed waste streams are as follows:

- Landfill leachate
- Industrial sludge
- Waste from fine chemicals
- Waste from dairy products
- Agricultural waste

The licensee currently has difficulties with the existing waste streams and the facility is not capable of accepting further waste streams.

Sections of the licence we are further concerned relate to:

Section E – Emissions – The Licensee’s inability to control, monitor and report issues concerning the abatement systems

Section F – Control & Monitoring

Section I – Existing environment & impact on the activity

The licensee states in section I.3, there is no sewage discharge at Premier Proteins.

Section J – Accident prevention & emergency response – Residents are not informed of any harmful emissions or spillages. Often there is no one contactable outside of normal working hours.

The contempt of the company and its representatives is evident from the anger the facility has generated throughout the town. The irony of the situation is that the EPA who issues the licence and conditions is also the agency that is responsible for its monitoring and enforcement of those conditions. Conflicts of interest, a separation of duties? However, it seems apparent this relationship can be manipulated and with the licensing section in Wexford and the monitoring division in Mayo, a breakdown in communication has enabled the licensee to operate ultra vires (outside their authority). Furthermore, the additional granting of the Municipal waste water and Sludge treatment waste stream from June 2009 to the Licensee, questions again the EPA’s competency and capacity to regulate.

Even when a site inspection report is commissioned by the EPA and the findings clearly state the licensee is in breach of the IPPC licence and receives a notification of non-compliance, no further action to enforce compliance is effected. The Joe Hunter RPS site inspection report from Sept 11th 2008 highlights the continuing breaches in their emissions throughout the period Aug 25th to 29th 2008. On each of the reported occasions mentioned, the malodorous fugitive emissions travelled outside the site boundary and significantly impaired the air quality in the surrounding areas according to the prevailing wind at the time. These breaches have affected both residential, commercial, and public buildings and it seriously interfered with the ability of individuals to enjoy their outdoor environment. The comments from the Licensee following the report says it all, “the oxidiser was not working effectively and may be giving rise to offsite odour, and was not operational during certain periods when the inspector detected offsite odours”.

Condition 2.6 of the emergency response procedure – In the case of odour abatement failure (and cannot be repaired promptly) divert all incoming raw material, process material already received and then shut down the cooker and inform the EPA of the incident as soon as possible. *How many times did Premier Proteins call the EPA?, How many complaints did the EPA receive about incidents? How many people do not complain?*

The EPA should look at the Facility, closure and decommissioning plan. According to table 3.4, closure costs amount to under € 200,000. It is our opinion that the existing facility should cease operations and relocate to a more suitable rural location within the next three years. All machinery and equipment can be transferred to the new location.

We reconfirm our objection to:

- a) the renewal of the IPPC licence
- b) the permission for the thermal recuperative oxidiser
- c) granting of any further proposed waste streams

Should any of the above be granted to the Licensee, the next steps would be legal action.

The EPA have failed in their governance through their role as the monitor and enforcer of the licence conditions. This haphazard regulator must now be accountable for the granting of a licence to a licensee. The inability to:

- a) monitor the facility regularly
- b) enforce the conditions of the licence
- c) prosecute for breaches
- d) take complaints seriously by residents
- e) protect the environment from pollution

Yours sincerely

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Representing Residential Committees from

Poolboy, Beechlawn, St.Brendans, Poolboy Cottages,
Harbour Road, Meadowbrook, Old Mill Road, Dun & Sli
Esker, Oak Glen, Beechlawn Heights & Canalach

Josephine Kennedy

From: Noeleen Keavey
Sent: 06 November 2009 15:41
To: Josephine Kennedy
Subject: FW: New submission entered for Reg no: P0045-06. (Reference Number: P0045-06-091106031601)
Importance: High
Attachments: EPA Licensing.doc

From: Brian Dolan [mailto:bridolan@yahoo.com]
Sent: 06 November 2009 15:16
To: Licensing Staff
Subject: New submission entered for Reg no: P0045-06. (Reference Number: P0045-06-091106031601)
Importance: High

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