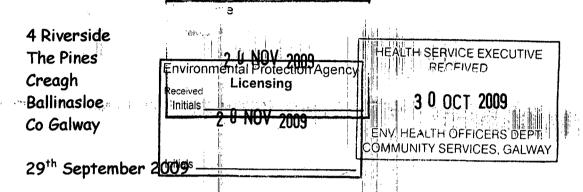


Ballinasloe Environmental Alliance



Re - Integrated Pollution Prevention and Control Licence P0045-05 Premier Proteins 2000 Ltd rendering plant Ballinasloe.

Dear Ms Horkan,

I understand that your office lodged an objection to the renewal of the above licence in June 2008 but the objection had missed the objection deadline. I am writing to you to express our serious and ongoing concerns regarding continued environmental pollution from this plant.

Might I start off by giving you a brief outline of the origins of this letter. Ballinasloe Environmental Alliance (BEA) is a local organisation founded in September 2007 specifically because of the ongoing environmental pollution from the Premier Proteins plant in Ballinasloe. This pollution largely relates to hundreds of odour emission complaints regarding the factory but also pollution of the local river and noise pollution. Local resident associations have been complaining to the factory for more than a decade now and I have documentation from the Pines Residents Association to Premier Proteins dating back to October 1997.

On September 3rd 2008 Premier Proteins 2000 Ltd pleaded guilty and were convicted by Ballinasloe District Court on 2 of 4 counts of pollution. The 2 convictions were in relation to odour pollution. The charges were in relation to offences that occurred in the period of May to December 2007.

In a further investigation by consultants RPS on behalf of the EPA for the period 25th to 29th of August 2008 Premier Proteins were found to be in breach of their licence regarding odour emissions on 34 occasions in that period. The findings were that these odours "did result in significant interference with amenities and the environment beyond the boundaries of the licensed facility"

The sites where odours were detected included residences in the Pines on 5 occasions, residences in Cois na hAbhainn on 5 occasions, a Hotel in Moycarn (The Moycarn Lodge and Marina) on 17 occasions, a residence in Portnick on 1 occasion and significantly Creagh National School on 2 occasions. Might I add that the principal of the school was a prosecution witness in the court case of September 2008, and he has been complaining to the factory and the EPA for a long number of years.

In our opinion the ongoing pollution from this factory has serious implications from an Environmental and public health perspective. The above examples from the audit carried out by RPS raises serious environmental health concerns with pollution having being detected at a local hotel, private residences and also the local school. Many local residents have given examples of their children being unable to play outside because of the stench from the factory. Evidence to this effect was given in the recent court case. The principal of Creagh National School has long complained of the effect the odour pollution has on the school and its pupils. Residents also report spillages of offal on the roads leading to the plant. There was one major spillage at a busy road junction adjacent to a local primary school some years ago, with bits of animal carcass and associated body fluids strewn all over the road. This ongoing problem and its effects on children and adults raises serious Environmental Health issues for the residents of Ballinasloe and its environs.

This pollution has had a seriously detrimental effect on the quality of my life and that of my family. This pollution prevents me and my family from enjoying our home and our outdoor space. I have documented many instances where we had to retreat inside our house and close all the windows and doors to try and escape the smell. On many occasions we had to fumigate the inside of the house with scented candles and aerosol air fresheners in an attempt to get rid of the smell that had invaded the inside of our house. On occasions during the summer months we were woken from our sleep by the stench from the factory invading our home

via windows we would have left open to take advantage of some fresh air during pleasant summer weather. I have documented instances where the stench has been so bad as to make me dry wretch in a physiological response to the smell coming from the factory. Residents give numerous examples of having to take in their washing from the line and wash it again in an effort to get rid of the smell from their clothes caused by the odour pollution from this factory.

I hope I have painted a brief picture of the serious nature of this pollution from an Environmental and public health perspective. I have included some press cuttings as well as a copy of the audit done by RPS on behalf of the EPA by way of giving some background information to you.

Given that The EPA corresponds with your office regarding the renewal of this licence I would presume that there must be some role for your department in this regulatory process. Can I urge you to take some action on our behalf and on behalf of the residents of the Ballinasloe area who should not be exposed to this Environmental and Public Health hazard. The IPPC licence is now subject to renewal again and we would urge your Department to object to the renewal of this licence on Environmental Health grounds and as a minimum ensure that there is strict monitoring put in place to ensure compliance with the licence.

Regards

Yours sincerely

Mick O'Hehir Chair BEA

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ENVIRONMENTAL HEALTH OFFICERS SERVICE, GALWAY,
HEALTH SERVICE EXECUTIVE,
WEST CITY CENTRE,
SEAMUS QUIRKE ROAD,
GALWAY.

SEIRBHÍS NA N-OIFIGEACH SLÁINTE TIMPEALLACHTA, Feidhmeannacht na Seirbhíse Sláinte, Ionad Iarthar na Cathrach, Bóthar Shéamuis Uí Chuirc, Gaillimh.

(091) 523122

(091) 529415

Our Ref:

Your Ref:

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MH/CM

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18th November 2009

Office of Climate, Licensing & Resource Use, Environmental Protection Agency,

PO Box 3000, Johnstown Castle Estate, Co. Wexford,

Ireland.

ENVIRONMENTAL PROTECTION AGENCY

2 0 NOV 2009

Re:

EPA licensing of Premier Proteins (2000) Ltd., Poolboy, Ballinasloe, Co. Galway

P00045-06

Dear Sir or Madam:

I am writing to you regarding the notification from the EPA to the Assistant National Director, Population/Environmental Health, HSE inviting any comments in relation to the licence review from the HSE. Having reviewed the proposal on the EPA website the EHO Department of the HSE have no comments to forward to the EPA regarding the licence review.

However, the HSE, EHO Department received a letter from Mr. Mick O'Hehir, Chairperson of the Ballinasloe Environmental Alliance expressing ongoing concerns regarding pollution from the above plant, on the 30th October 2009. (copy enclosed)

The main concerns relate to odour pollution from the plant affecting their quality of life. I have spoken to and written to Mr. O'Hehir regarding his letter. I have outlined to him that odour control, odour emission limits and odour monitoring are all set and monitored by the EPA. Thave explained to him that the EPA are the statutory enforcement authority regarding odour

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emission from the plant, but that we would forward his letter and request that you give it consideration when carrying out your review and when undertaking further odour assessments to ensure compliance.

Yours sincerely

Maria Horkan.

Senior Environmental Health Officer

CC: Mr. Maurice Mulcahy, Area Chief, HSE West. EHO Department, West City Centre, Seamus Quirke Road, Galway.

CC: Dr Diarmuid O'Donovan, Director of Public Health, HSE West, Merlin Park Hospital, Galway

"As a Department we are striving for continual improvement in our service and we would welcome any comments you have in this regard. If there is any issue you disagree with in this letter I ask that you put it in writing to the Principal Environmental Health Officer at the above address within 10 days".