

Ref: 101\_250\_6k\_130906L1dc

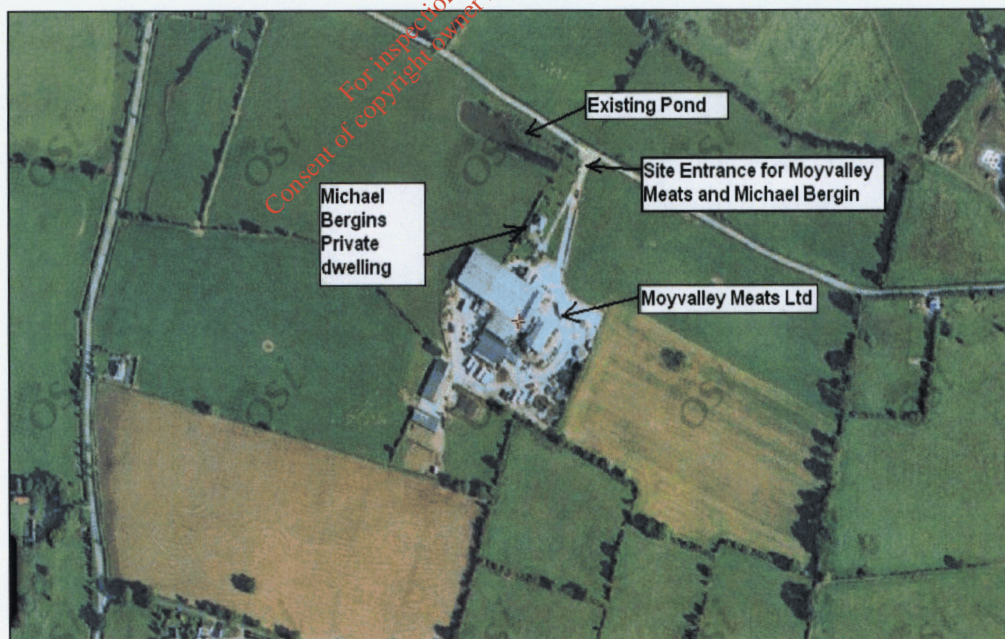
Office of Climate, Licencing & Resource Use,  
EPA Headquarters  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

06<sup>th</sup> September 2012

**Re: Moyvalley Meats, Tanderagee, Broadford, County Kildare**  
**Ref: PO192-02**

Dear Sir/Madam,

ORS Consulting Engineers have been requested by Mr. Michael Bergin, Tanderagee, Broadford, County Kildare submit the following comments in relation to the aforementioned licence review. Michael Bergin and his family reside at the aforesaid address immediately adjacent to and to the north of the existing Moyvalley Meats facility. Relative locations are indicated in Fig 1.1. This document forms an objection to the current licence review application PO192-02.



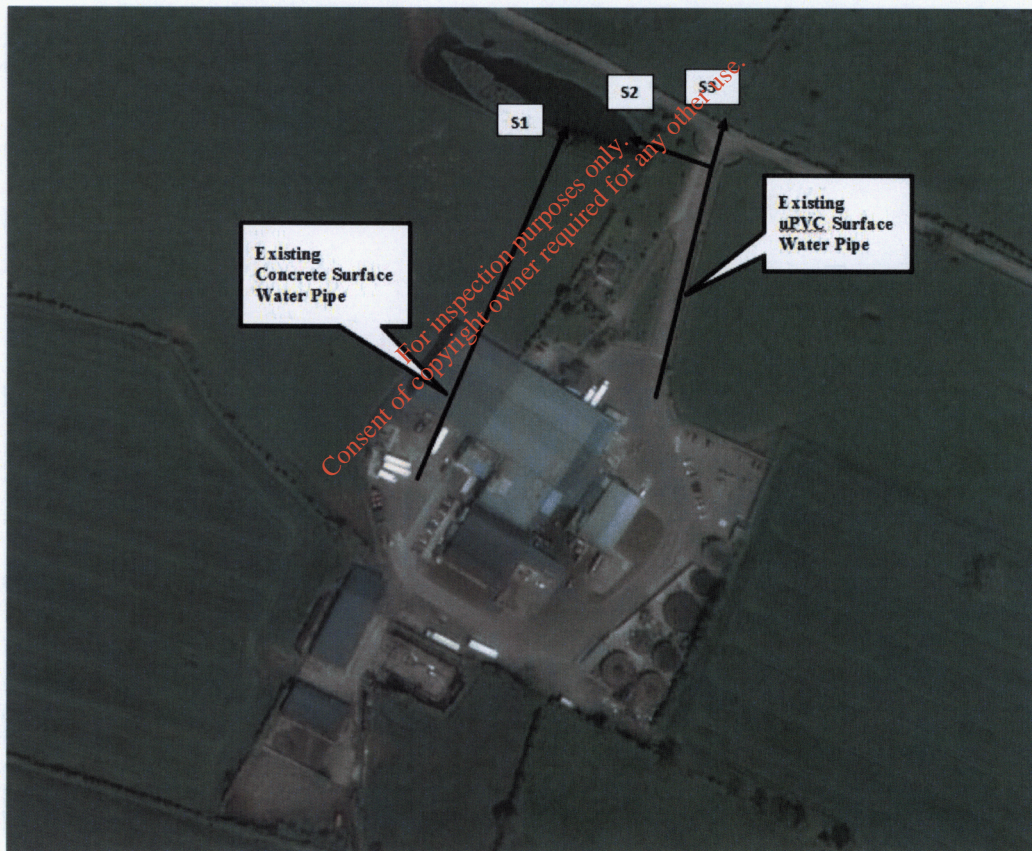
**Fig 1.1 Site Area & Relative Location**



This objection would like to take into question the use of “Best Available Techniques” on the site as referenced in the Licence review application, with specific regard to environmental emissions.

### Surface Water

All surface water drainage from the Moyvalley Meats facility is currently being drained via gullies and associated pipework to a pond to the north of, and in the ownership of Mr Michael Bergin. The area being drained to this pond, including yard, car parking and roof areas is approximately 23,000 square metres. There are 2 surface water discharge points noted on the Licence review application which facilitate the Moyvalley site, where in fact there are at least three. There are 2 outfall locations at the pond and a third which goes under the local road (L1003) to the front and discharges into a field opposite the entrance. (Refer to Fig 1.2). The new licence needs to ensure that all of these discharge points are redirected to the River Glash.



**Fig 1.2** Existing Surface Water Network / Outfall



None of the pipework facilitating the site benefits from any sort of treatment infrastructure such as attenuation tanks or oil / petrol interceptors despite the large amount of impermeable surface involved. As part of the Licence review the EPA have requested that Moyvalley Meats redirect the surface water outfall away from the pond and discharge the surface water to the River Glash instead, Moyvalley Meats have been given 6 months to carry this out from the onset of the Licence period.

Due to the large amount of impermeable area currently being facilitated by the existing pipework it is imperative that control measures are put in place for at least this 6 month period to compensate for the fact that there is no treatment infrastructure on the existing pipework. These control measures need to be put in now to stop any further pollution of the pond and details of same need to be made available Michael Bergin and the EPA.

On the 24<sup>th</sup> of July 2012, ORS Consulting Engineers were requested by Mr Michael Bergin, to investigate an apparent diesel spillage into the pond located on his lands. On arrival at the site it was apparent that the spillage has occurred to the rear of the Moyvalley Meats Facility. The indication was that approximately 200 litres of diesel fuel leaked from a refrigerated unit parked at the rear of the plant, with the spillage entering the surface water network via a series of gullies located in the yard. The surface water network in this instance was a concrete sewer pipe discharging to the existing pond to the front of Michael Bergin's residence. A sample was taken from the eastern end of the pond, the results are outlined in table 1.1 and the certificate of analysis is attached

Test Parameter	Analytical Technique	Result	Units
BOD (Industrial Eff.)	Electrometry	285	mg/L
COD (Industrial Eff.)	Colorimetry	1620	mg/L
Mineral Oil by Calculation	GC-FID	158.78	ug/L
Oils, Fats & Grease	Solvent Extraction/ Gravimetry	216	mg/L
Suspended Solids (Industrial Eff.)	Gravimetry	1134	mg/L
TPH (>C10-40)	GC-FID	158782.24	ug/L

**Table 1.1** Surface Water Sample, 24/07/12

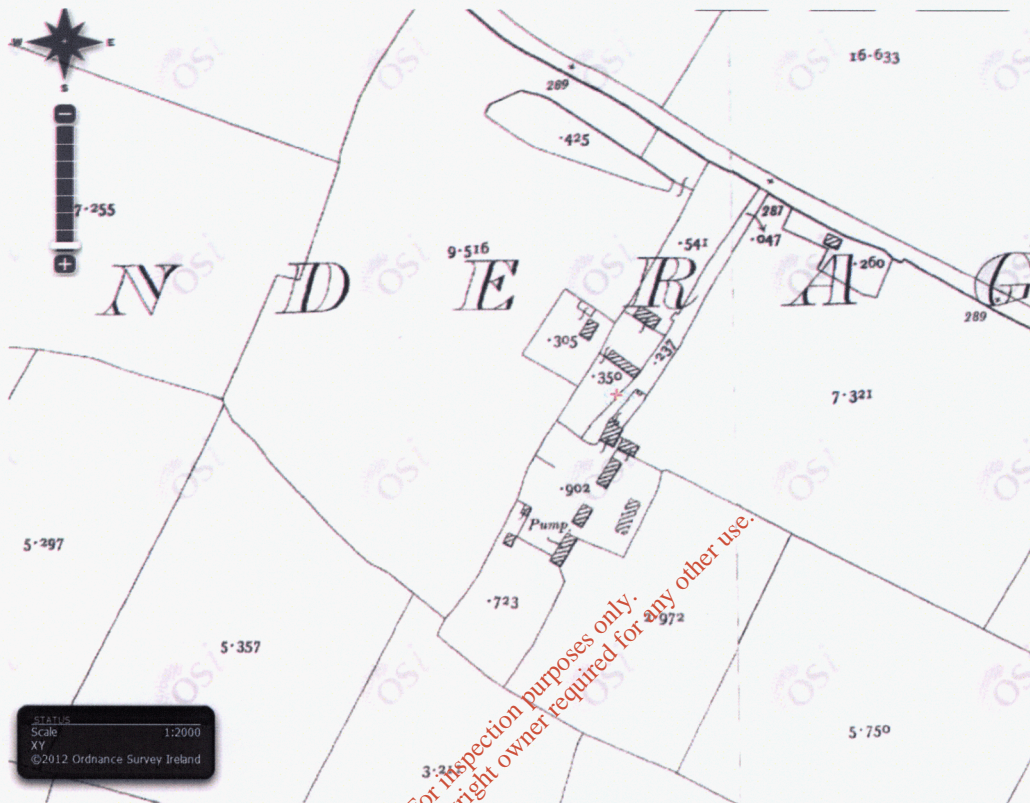


It would appear historically that there was no pond at this location as indicated in Fig 1.3 and the original excavation which appears on the ordinance survey maps in 1897 – 1913 (Fig 1.4) may initially have been a sand or gravel pit. There is evidence of this extractive industry to the immediate west of this location. The pond, as it is apparent today, would appear to be associated with the increase in hard surface areas within the Moyvalley Meats site. (Refer to Figs 1.3 to 1.8 incl.)



**Fig 1.3 Historic 6 inch (1829 – 1841) (OSI) – EN0045812**





**Fig 1.4** Historic 25 inch (1897 – 1913) (OSI) – EN0045812

At this point in time it can be assumed that there is no surface water network in place which has any impact on the pond location. It becomes apparent that the pipe to the pond was in place in 1995 as evidenced in Fig 1.5 which shows the route of the pipe to the west of the residence running in a south – north direction.





**Fig 1.5** Orthophotographic 1995 (OSI) – EN0045812

It can be assumed that the pipe was laid in and around the time this photograph (Fig 1.5) was taken as indicated by the associated ground disturbance.

It is difficult to tell from Fig 1.5 the amount of water present in the excavated area but Fig 1.6, a picture taken 5 years later does not appear to show the volumes of water that are present today.

The volumes of water associated with the present day situation are associated with the hard surfacing of the yard and access ways surrounding the Moyvalley Meats facility.

The first phase of paving the surrounds of the abattoir was completed in October 2004. The first phase included the entrance to the factory as far as the wall of the existing sheep lairage. There is also a car park to facilitate all staff to the left of the driveway. This accommodates 65 cars and the whole area has been paved using hot rolled asphalt





**Fig 1.6** Orthophotographic 2000 (OSI) – EN0045812

The next phase included the area in front of the lairage and extends as far as the Waste-Water Treatment Plant. This area has been graded to fine-tune an existing fall towards the lairage. This area carries cattle trucks and is designated as a contaminated area and all washings are diverted to the Waste Water Treatment Plant. Any areas that do not carry vehicles are designated as green areas and are landscaped. Ultimately all the yard areas were paved

There does not appear to be a planning application lodged with Kildare County Council for the hard surfacing of this area. As part of these works all surface water from the rear of the facility was directed via gullies into the existing concrete pipe, not petrol / oil interceptors are evident on site. The surface water runoff from the front of the site and the access way is directed via gullies to a pipe which enters the pond from the east and crosses the road at the entrance, again no petrol / oil interceptor is evident on the site. There is a third discharge point across the road at the entrance, no interceptor is evident





**Fig 1.7** Orthophotographic 2005 (OSL - EN0045812)

From 2005 onward there is a marked increase in the amount of water evident in the pond area, this can be attributed to the surface water capture associated with the large extent of paved area. The original pipework in the area was servicing drainage associated with roof water only and a gravelled surface would have existed on the site. (Refer to Figs 1.7 & 1.8)





Fig 1.8 Image Data 18/04/2009 (Google Earth)

In Attachment D.2, Environmental Considerations and Best Available Techniques, of the Licence review application the question is asked ***“Describe any environmental considerations which were made with respect to the use of cleaner technologies, waste minimisation and raw material substitution.”***

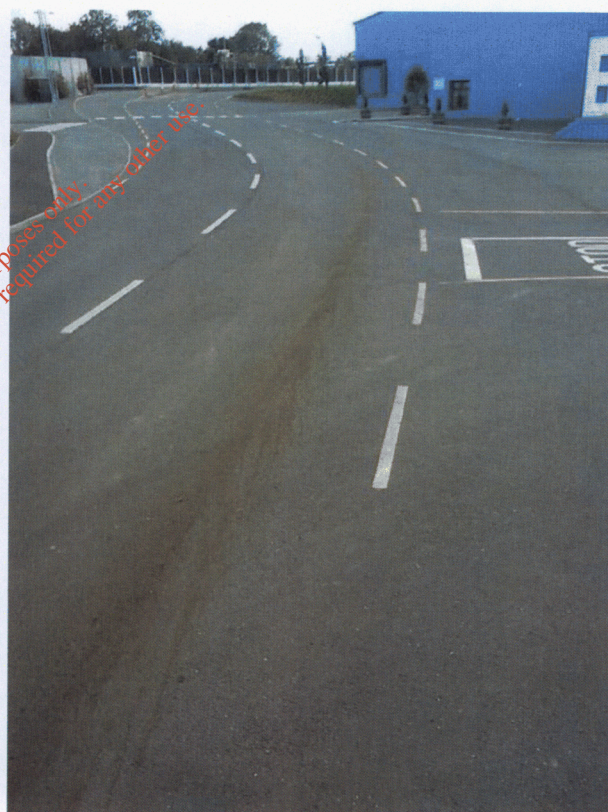
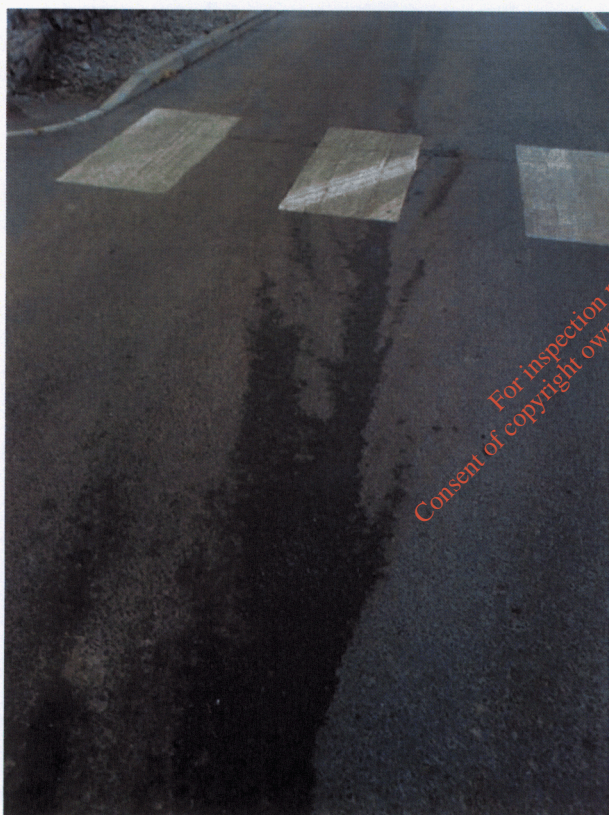
Moyvalley Meats states;

***“Moyvalley Meats utilises the best available technologies to prevent or eliminate, or where that is not practicable, reduce the emissions from the activity. To this end, the existing surface water discharges from the site complies with the emission limit values specified in the ‘BAT Guidance Note on Best Available Techniques for the Slaughtering Sector’***

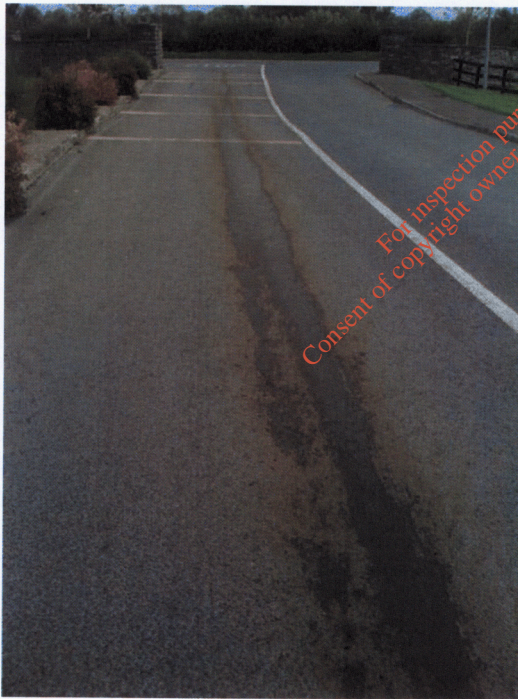


We would contend that this answer does not take into account that this facility has been discharging surface water, since at least 2005, to the pond without the benefit of any treatment. The paving on site would appear to have been carried out without the benefit of planning and as such was not conditioned to introduce treatment infrastructure on the surface water network. This should have included at the very least petrol / oil interceptors prior to any discharge and attenuation / retention tankwork to regulate the surface water flow. If these measures were in place then the diesel spillage mentioned previously would have been avoided.

The hazards associated with not having surface water treatment on the site can be further illustrated by the following photographs, all taken recently on the Moyvalley Meats site and indicate the type of material which is finding its way to the pond via the surface water network.





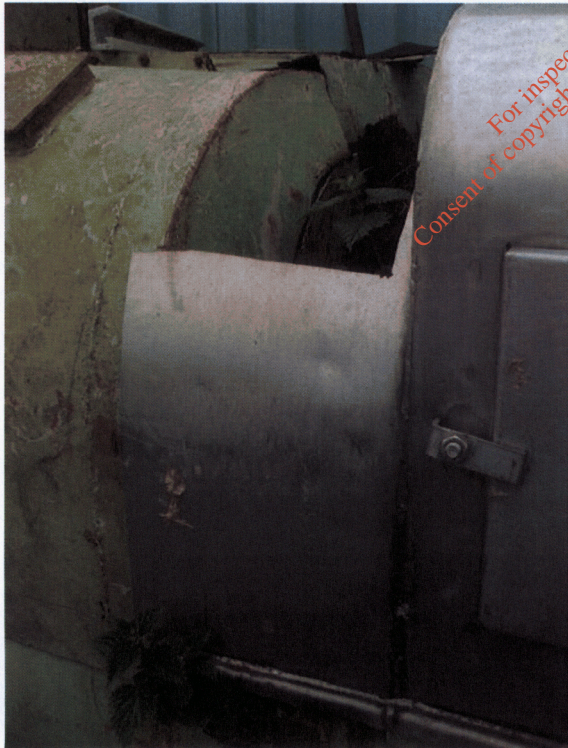






The following pictures are of a broken paunch press which would appear not be operational for some time. If the paunch is not pressed prior to transport it will leak from the trailers within the site, on the drive way and on the public roads leading to pollution, this situation needs to be rectified immediately







Moyvalley Meats in their license application refer to the BAT Guidance Note on Best Available Techniques for the Slaughtering Sector published by the EPA 2008

Section 4.2 "BAT Guidance Note on Best Available Techniques for the Slaughtering Sector" risk to the environment states that;

The key environmental issues for slaughterhouses are water consumption, the emission of high organic strength liquids to water, energy consumption associated with refrigeration and water heating, and infectivity in relation to transmissible spongiform encephalopathy (TSE) risk materials. **Odours from animal by-product storage and handling and the waste water treatment plant, as well as noise from equipment and animals**, can also be local issues.

There is evidence that odours and noise associated with the Moyvalley Meats operation are excessive and as such do present a nuisance Michael Bergin and his family.

#### Noise

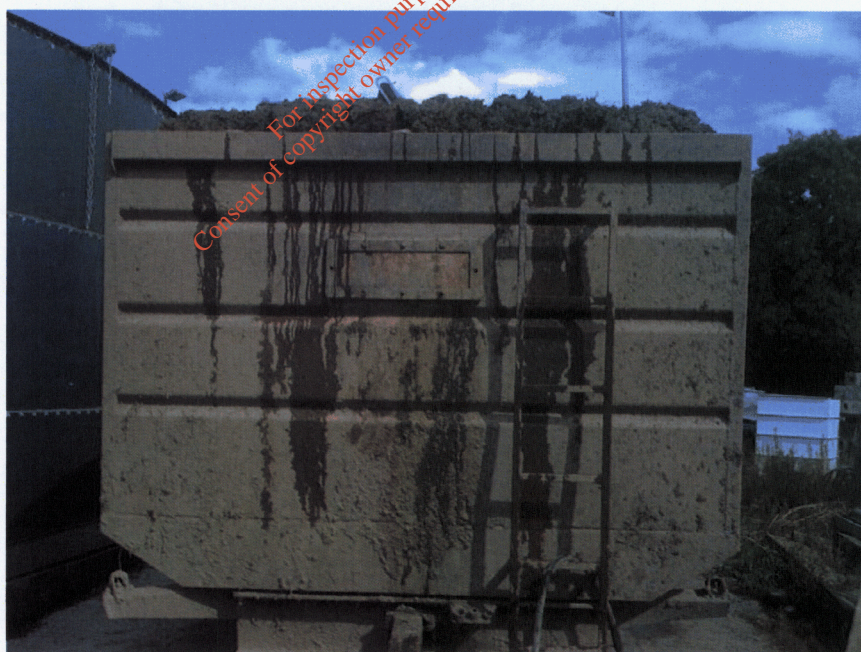
The noise nuisance is primarily to do with vehicular movements adjacent to the residence and the noise being emitted by extractor fans. The industry norm needs to be applied in this situation with a maximum  $L_{aeq}$  of 55 dBA during the daytime hours and a  $L_{aeq}$  of 45 dBA during the night. These levels need to be monitored, monitoring locations around the boundary of the site need to be identified and the existing residence need to be identified as a noise sensitive location.

The Licence review indicates that daytime hours should be considered from 0800 hrs to 2200 hrs and 2200hrs to 0800 hrs for nighttime. We would contend that given the proximity of the residence that the daytime hours should be **0800hrs to 2000hrs** and the nighttime hours **2000hrs to 0800hrs**.

#### Odour

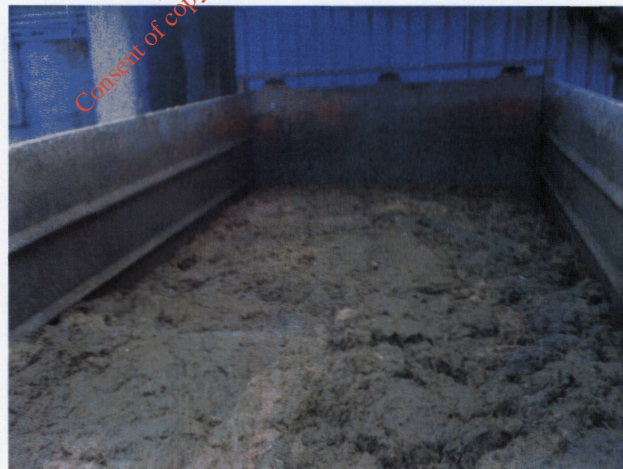
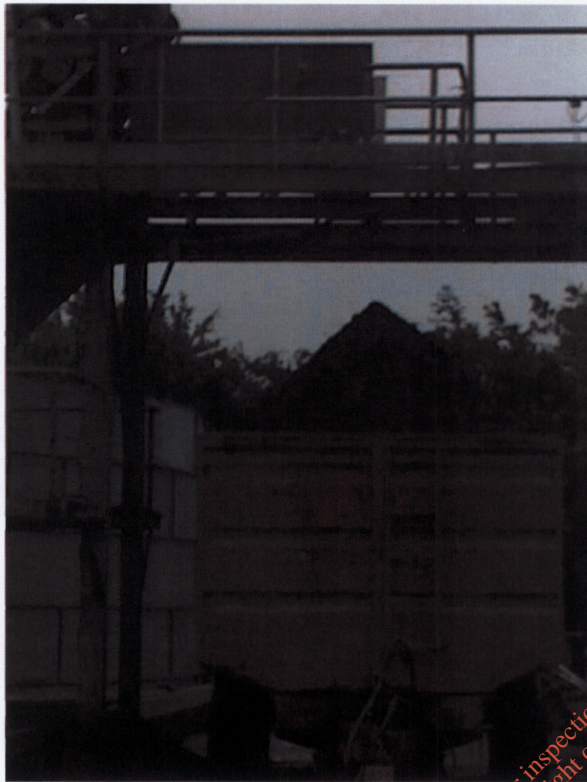
Odour from the site is primarily associated with the WWTP, activity on site, uncovered trailers and inadequate storage.





Sludge/paunch trailer full and been stored on pervious surface, leachate can be seen escaping non sealed trailer which has no cover.





Overloaded trailers and no covers leading to odours emanating from the site





Overloaded trailer not sealed

At the very minimum the following techniques should be introduced to prevent or minimise the formation of air emissions and odour in all slaughterhouses:

- Audit odour to identify and characterise sources and determine any action required
- Enclose animal by-products during transport, loading/unloading and storage to reduce odour; enclose all odour generating process activities using negative pressure extraction units in such processing, handling and storage areas
- Contain potentially odorous materials in enclosed containers, maintain short storage times and use cold storage as deemed necessary
- Carry out frequent cleaning of material storage areas to prevent odour.



In Attachment D.2, Environmental Considerations and Best Available Techniques, of the Licence review application the question is asked "Describe the measures proposed or in place to ensure that:"

**(a) the best available techniques are or will be used to prevent or eliminate or, where that is not practicable, generally reduce an emission from the activity;**

*Moyvalley Meats response: The best available techniques are in place at the facility for air emissions and water emissions.*

**b) no significant pollution is caused;**

*Moyvalley Meats response: Moyvalley Meats has been operating under an IPPC Licence since 1996, and the Environmental Management System (EMS) controls and monitoring systems are in place to ensure that no significant pollution is caused by the activities at the site.*

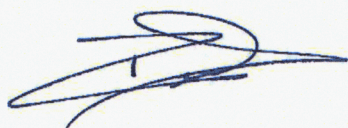
**(e) the necessary measures are taken to prevent accidents and limit their consequences; and,**

*Moyvalley Meats response: There are a number of controls and monitoring systems in place at Moyvalley Meats as part of the facilities Environmental Management System (EMS). Moyvalley Meats has an accident prevention procedure to assist in preventing any accidents. Furthermore, Moyvalley Meats has emergency procedures in place to implement appropriate control measures in the event of an emergency.*

Surface water flow cannot be allowed to continuously discharge to the pond as it is currently doing so without mitigation measures, in the form of suitably sized interceptors and attenuation infrastructure, being put in place immediately. Currently there is a lack of monitoring specific to the pond. The pond will need to be monitored daily until such infrastructure is in place and access to carry out this work can be arranged with the landowner.

It is clear that there is still a lot of work to be carried out and procedures to be implemented before Moyvalley Meats are in compliance with their licence. It is important at this juncture that the EPA realise that they have a responsibility to monitor the site and enforce the conditions inherent in the licence.

Yours sincerely,



Damien Collins  
ORS Consulting Engineers  
On behalf of Mr Michael Bergin  
Tanderagee, Broadford, County Kildare

encl. Certificate of analysis, Fitz Scientific





## Monitoring and Testing Services

A copy of this certificate is available on [www.fitzsci.ie](http://www.fitzsci.ie)

Unit 35,  
Boyne Business Park,  
Drogheda,  
Co. Louth  
Ireland

Tel: +353 41 9845440  
Fax: +353 41 9846171  
Web: [www.fitzsci.ie](http://www.fitzsci.ie)  
email: [info@fitzsci.ie](mailto:info@fitzsci.ie)

<b>Customer</b>	Damien Collins ORS Consulting Engineers Marlinstown Office Park Mullingar Co. Westmeath	<b>Lab Report Ref. No.</b>	9740/001/01
		<b>Date of Receipt</b>	25/07/2012
		<b>Sampled On</b>	24/07/2012
		<b>Date Testing Commenced</b>	25/07/2012
		<b>Received or Collected</b>	Courier: DPD
		<b>Condition on Receipt</b>	Acceptable
<b>Customer PO</b>		<b>Date of Report</b>	13/08/2012
<b>Customer Ref</b>	M. Bergin Moyvalley - Sample 1	<b>Sample Type</b>	Trade Effluent
<b>Ref 2</b>			

## CERTIFICATE OF ANALYSIS

Test Parameter	SOP	Analytical Technique	Result	Units	Acc.
BOD (Industrial Eff.)	113	Electrometry	285	mg/L	UKAS
COD (Industrial Eff.)	107	Colorimetry	1620	mg/L	UKAS
Mineral Oil by Calculation	189	GC-FID	158.78	ug/L	
Oils, Fats & Grease	101	Solvent Extraction/ Gravimetry	216	mg/L	
Suspended Solids (Industrial Eff.)	106	Gravimetry	1134	mg/L	UKAS
TPH (>C10-40)	188	GC-FID	158782.24	ug/L	

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Signed: A. Harmon  
**Aoife Harmon - Technical Supervisor**

**Date : 13/08/2012**

Acc. : Accredited Parameters by ISO 17025:2005

PVL - Parametric Value Limit as per EU Drinking water Regulations (SI 278 2007)

All organic results are analysed as received and all results are corrected for dry weight at 104 C

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Results contained in this report relate only to the samples tested

\*\*The analytical result for this parameter may not be reflective of the concentration present at the time of sampling. The maximum recommended preservation time for this parameter has been exceeded.



## Dorota Richards

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**From:** Michael Bergin <d.collins@ors.ie>  
**Sent:** 11 September 2012 10:53  
**To:** Licensing Staff  
**Subject:** New Third Party objection entered for Reg no: P0192-02. (Reference Number: P0192-02-120911105058)  
**Attachments:** 101\_250\_6k\_120906L1dc.pdf  
**Importance:** High

**Title:** Mr  
**First Name:** Michael  
**SurName:** Bergin  
**Organisation Name:**  
**Address Line 1:** Tanderagee  
**Address Line 2:** Broadford  
**Address Line 3:**  
**County:** Kildare  
**Post Code:** 0000  
**Email:** [d.collins@ors.ie](mailto:d.collins@ors.ie)  
**Objector Type:** Third Party  
**Oral Hearing:** No

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