



Submission

Submitter:	Afra Cronin
Submission Title:	Submission Document on Odour Audit
Submission Reference No.:	S010439
Submission Received:	13 July 2022

Application

Applicant:	Anglo Beef Processors Ireland Unlimited Company
Reg. No.:	P0040-03

See below for Submission details.

Attachments are displayed on the following page(s).

2/7/22.

Before the planning permission for the odour oxidizer for the rendering plant was received, the city of Waterford was already suffering from the stinking odours emanating from the private sewage plant attached to the outflow from the facility. We had a long struggle to get the management to cover the paddle, which rotated and aerated the debris from the tanks, and then deposited into waiting open backed trucks. Birds had access to the waste, and the stench was nauseating. The people of the area complained, and finally the unit was covered. When the management has an “accident”, the E.P.A., has accepted excuses all down the years. It happens again, and again. This is a regular occurrence.

The odour oxidizer – for which no EIS was obtained, we were told, had been given planning permission by Kilkenny County Council, as the facility is in that county. (As I will quote later, this turned out not to be the case). The Local Authority Veterinary Surgeon, questioned in a letter to the K.C.C., and I quote:

“There is no information supplied with the application on the process involved.

“The following information would be required to evaluate risk to food and food animals in the area.

1. The chemical process (action) involved.
2. The fuel used in the process and the energy generated.
3. Emission to air, e.g. chemical Pathogens, etc.
4. Liquid waste, if any, its method of storage and disposal
5. Micro-organic pollutants generated, if any.
6. Information on pathogen reduction through the system and if any pathogens present in emissions to the air, solid or liquid waste.
7. Particulate dimensions.
8. THE CONCLUSIONS OF AN ENVIROMENTAL IMPACT STUDY.”

The council sent a copy of this letter to the EPA. Further to the unnecessary continuation of the sewage plant – the new sewage plant for Waterford City and South Kilkenny had been installed; on reading the letter between members of statutory bodies, it is clear that the apb sewage system was part of the plan. However, when the time came, the owner decided not to comply, as “it would cost me too much money”. A pump would have been necessary to drive the sludge uphill.

This was accepted, despite objections from all concerned. (Where does this buck stop?)

(I would like to point out that I have correspondence to the affect that the planning permission for the sewage tanks was for a much bigger system. Without official agreement, that I can find, smaller tanks were installed as “ we hope the rendering plant in Rosegreen will be up and running by then”. They did not reckon on the resistance of the people of Carrick-on-Suir, and a wealthy bloodstock owner. The question is – could that be the reason for so many mal-functions in Christendom, Co. Kilkenny?)

Probably, the more polluting of the two mal-functioning plants is the rendering. All local “bodies” have a problem with this. None has asked questions, that would have occurred to a lay person! In a letter from the Senior Executive Officer in planning at Kilkenny County

Council dated 11th, November 2003, in answer to the question “Why was an E.I.S. not required, and what criteria did the Council use in coming to its conclusion on the matter” he replied “Kilkenny County Council’s status in these matters is that of Planning Authority. The requirement for an E.I.S is only considered where a planning application is received..... No such planning Application for a process change has been received by K.C.C., since the E.I.S., requirement was introduced, and accordingly K.C.C. has not formed any opinion as to whether an E.I.S. is required. The issue of the Council’s criteria does not therefore arise.” If I read this correctly, there was no planning permission sought nor granted for what has become a pollution source in the city of Waterford. “Under part 4 of the E.P.A. Act, 1992, any environmental conditions imposed by the local authority under planning are null and void “. K.C.C. Engineer, 18th March, 1997.

I closed two businesses due to the stinks emanating from the rendering plant or sewage plant. The year I got a 4* rating for a bed and breakfast, I was forced to close by the first August. The smell was such, that several people, who had booked through Bord Failte would not stay, and got their deposit back. Then, after a few years letting self-catering cottages, I could not continue for my own mental health. The tension of unexpected odours, became unbearable.

What has happened now?

Having visited the environmental officers of Kilkenny Co. Co. last Monday 11th July, and realized I see a pattern developing, which is almost replication what happened twenty odd years. They had not been contacted by the EPA about this proposed extension of their licence. So, if no planning permission is sought, Kilkenny Co. Co., cannot ask for the required Eis. (or whatever its iteration is now). Is the public being deliberately fooled? Having sought an air quality and house-keeping review for over twenty years, this opportunity is indeed welcome. To quote Tom Mueller “Whistle-blower narratives are often inspirational: individuals who, defying all odds, see no moral choice but to expose egregious ethical or criminal wrongdoing IN THE PUBLIC INTEREST. And “Tom” has lived in fear since.

I would like to thank the E.P.A., for this opportunity.

I will finish on another quote – “A person (or body) may cause evil to others, not only by....actions, but byinaction, and in either case ..justly accountable to them for the injury”. John Stuart Mill.

Yours hopefully,

Afra Cronin.