



### Submission

Submitter:	Mr Paul Byrne
Organisation Name:	Kilkenny County Council
Submission Title:	P0040-03 Kilkenny CoCo Submission to the EPA
Submission Reference No.:	S010459
Submission Received:	21 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).



Our Ref: ENV-A-22-04

Date: 21/07/2022

Environmental Licensing Programme,  
Office of Environmental Sustainability,  
Environmental Protection Agency,  
Johnstown Castle Estate,  
Co. Wexford

**Re: Submission in relation to Industrial Emission Licence P0040-03 Review**

A Chara,

I refer to your letter dated 06/07/2022 inviting submissions on the review of a licence held by Anglo Beef Processors Ireland Unlimited Company for an installation located at Christendom, Ferrybank, Co. Kilkenny. The EPA reference for the reviewed licence is P0040-03. The installation under review is the animal by-products rendering plant trading under the name Waterford Proteins.

The Environment Section of KCC have received a limited number of odour complaints in relation to the facility from time to time. These complaints would be forwarded to the EPA for investigation given that the facility is operated under an Industrial Emissions Licence.

However, the Environment Section has received a number of representations in relation to the facility in terms of the licence review that is taking place. The Environment Section recently contacted the facility operator to arrange for a site visit of the rendering plant and Wastewater Treatment Plant. A site visit was carried out on the 30/06/2022 by my colleague Thomas Brennan and myself. The site operators walked us through the full process in the facility and the operators displayed full cooperation and courtesy during the site visit. The operators of the facility appear to be running the facility very well, with the area around the buildings clean and tidy. External roller doors only remain open for a short period during intake. All lorries observed entering the site were covered and remained so until roller doors were closed

Therefore, following the site visit and considering the licence review documents available online, the Environment Section would make the following comments:

1. It was noted during the site visit that the buildings internally are maintained at negative air pressure in an effort to prevent odour escape. The facility currently has two odour controls for treating the air that passes through the facility buildings. The first is the existing thermal oxidizer which primarily treats the vapours from the cookers. The air from the remainder of the process buildings is passed through the existing biofilter. The existing biofilter has been in place for a number of years and originally used peat as the filter media. However, the plant operators have switched to using woodchip which is more environmentally sustainable. The wood chip is changed periodically and is kept constantly damp with water sprinklers. The biofilter is open with the top of the woodchip a few metres above ground level. Consistent and persistent odours from the biofilter were noted on the access road to the south, 120m away. We would suggest subject to planning that an enclosed Biofilter system be considered, with further controls prior to venting to the atmosphere.



2. The Environment Section has noted that in the ABP report called "Receiving Environment Report" submitted as part of the documentation for P0040-03, there is no reference made to odour impact on the surrounding environs.
3. In reviewing the documentation submitted as part of P0040-03, it is noted that the applicant has proposed to increase the intake from 375 tonnes per day to 600 tonnes per day. Kilkenny County Council would highlight that any increase in activity must be done in line with the planning permission granted for the facility and that the EPA acquires proof of such from the applicant before making a determination on the reviewed licence. Any material changes to the facility, or to the facility operation may require a new planning application.
4. We were also advised during our site visit that it is the applicant's intention to seek planning for works to the waste water treatment plant.
5. Additionally, on the increase in intake amounts, an assessment of the odour control measures should be carried out to confirm if they have the capacity to treat the additional potential loads going to the thermal oxidizer and biofilter.
6. Consideration should be given to the control of odours from the lorries travelling to the plant, covered loads notwithstanding. We noted significant odours from lorries entering the plant and from lorries travelling on the M9 Motorway to the plant. An increase with the intake may lead to increased odour nuisance complaints in residential areas leading into the plant.
7. The Environment Section note that a reduction in the quantity of waste water being discharged to the waste water treatment facility across the road is proposed. However, the pollutant load of the discharge will increase due to a reduction in dilution. The EPA should assess the change in waste water discharge to ensure that the final discharge to the Suir estuary still meets the licence requirements and that there is sufficient assimilation capacity in the River Suir.

Is mise, le meas,

---

**On Behalf of the Environment Section**  
**Kilkenny County Council**  
**(056) 779 4470**