



Submission

Submitter:	Mr Tomás Breathnach
Organisation Name:	Kilkenny County Council
Submission Title:	P0040-03
Submission Reference No.:	S010644
Submission Received:	20 October 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).

Environmental Protection Agency
Johnstown Castle
Wexford

Date : 20th October '22
Ref : 22-1487

Re : Anglo Beef Processors Ireland Unlimited Company T/A Waterford Proteins (P0040-03)

Dear Sir/Madam,

I understand that the Environmental Protection Agency is conducting a review of an IPC licence issued to Waterford Proteins for its rendering plant at Christendom, Ferrybank. The review, currently on-going, was instigated due to material changes in the nature and extent of emissions at the plant.

Emissions from the plant have given rise to concerns locally and I have been asked to bring them to your attention and to seek their address as an outcome of your review of the IPC licence.

Issues of concern

Potential contamination

It is intended to reduce water usage on the site such that the volume of wastewater going for treatment is reduced from 400 cubic metres to 300 cubic metres per day. This 25% reduction in water usage will result in the increased concentration of contaminants. There is concern about the capacity of the wastewater treatment system to deal with it especially due to the proximity of the River Suir and Waterford Harbour.

The combination of reduced water intake into the wastewater treatment system (25%) and increased material intake into the plant (60%) will significantly diminish the dilution effect (reduced by 47% on existing levels). This has potential, without greatly scaled up protective measures, for increased contamination exiting the treatment system. Any grant of a discharge licence should be fully cognisant of this potential and additional measures to ensure secure containment should be conditioned into any licence permitted. There should be additional monitoring points along the discharge route to ensure that the containment measures are of the highest standard.

Potential noise nuisance

There is significant residential development within close proximity of the plant. Residents deserve to know that noise levels from the plant will be minimised. They also deserve to be assured that noise detectors are located at the optimum monitoring points to ensure minimum noise impact on local residents.

Potential Odour

Odour is the issue most referred to by local residents. They are concerned by the proposal to increase the volume of raw material accepted daily from 375 tonnes to 600 tonnes. This represents a 60% increase in throughput at a time when there are concerns about existing levels of throughput.

It would seem that there are three main odour abatement systems in operation in the plant. They include negative air pressure, a woodchip bed biofilter and thermal oxidiser. Residents need to be assured that improved odour minimisation and abatement measures will address existing concerns and that there will not be an increase in the frequency and intensity of odours emanating from the plant. Consideration should be given to enclosing the biofilter system, which together with additional controls prior to venting, could reduce to a minimum/eliminate odours exiting into the nearby atmosphere. According to the submission from Kilkenny County Council, no reference was made to odour impact on the surrounding environment in the documentation in the ABP Report called 'Receiving Environment Report'. This impact should be a central element of any licence review.

Also, reference has been made by local people to odours from lorries travelling to the plant. Residents and road-users are deserving of the highest standards of odour control from all lorries bringing material to the plant. The intention to increase throughput in the plant will result in the increased frequency of material deliveries. It is understandable that residents would seek to get their stated concerns about existing levels satisfactorily dealt with before any additional deliveries are proposed. The intensification of deliveries would also have implications for all road users and especially for road users and householders within a short distance of the plant.

An increase in the throughput as referred to should require an application to Kilkenny County Council for planning permission. This would allow local people the opportunity to engage in the public consultation process and have the proposal being subject to the full rigours and critiques of the planning system.

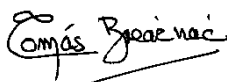
Conclusion

The plant was granted an IPC licence by the EPA in 1997 (P0040-01). A subsequent review resulted in a revised IPC licence being issued in 2001 (P004-02). This current review was instigated by the EPA in December 2020 (P004-03)

Since the award of P004-02 much time has passed. Compliance to standards set then is not sufficient now. Technology is far superior. Environmental standards have risen considerably. People's expectations have increased. Adherence to the highest standards is expected and there is now reduced tolerance of anything less than those standards.

The review of the IPC licence should address all of the above issues to assuage the concerns of people locally.

Yours faithfully



Cllr. Tomás Breathnach