



Submission

Submitter:	Mr bryan mccarthy
Submission Title:	IE P004-03 Review
Submission Reference No.:	S010869
Submission Received:	08 January 2023

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).

Submission on IE Licence Review P0040-03

Submission by Bryan McCarthy, 8th January 2023

1. The AWN 'Determination of Odour Emissions Report' (uploaded to the portal on 11th November 2022 by the applicant) states that inputs for their odour emission model is based on covering of the biofilter and installation of a biofilter stack 10m high. The biofilter is uncovered and does not have a stack at present.
Under the EPA Industrial Emissions Licencing Review Form and Guidance Note, Section A.5. 'Planning Requirements associated with this review' states that if planning permission is not required for works then written confirmation is to be submitted by the planning authority (Kilkenny Co. Council) or An Bord Pleanala.
It would appear that in order to comply with the licence review the applicant's Consultants, (AWN) have stated that upgrade works to the on site biofilter system is required. While the upgrade works would improve odour issues I consider that any 'development' works to the plant would require planning considering its proximity to the River Suir SAC. Kilkenny Co. Council would need to determine if the proposed upgrade works are exempt from the planning process, in accordance with the EPA IE Licencing Review Form & Guidance Notes.

A determination on the licence review cannot be made until this is clarified.

If it is determined that the biofilter upgrade works are exempt from the planning process then a strict time frame to carry out the upgrade works should be part of any licence determination.

2. Emissions Compliance Report, Attachment 7-1-3-1 WWTP

Under Section 3.1.2 of the report it is stated that the WWTP accepting waste from the site has a licence for 400m³/day discharge to the River Suir (equivalent daily outflow of approx. 988 houses) and that it proposes to reduce this to 300m³/day by increasing the concentration limits of the current licence.

I assume that any alteration to discharges from the WWTP will require a licence application/licence review (although licenced under a separate IE licence) and that the revised discharge rates/concentrations suggested under this review cannot be approved under this IE licence P004-03.

3. Intake tonnage rates

The applicant states that they have permission under the current licence to process up to 450 tonnes/day. Under this review they have requested that they be allowed to increase the truck intake (not process tonnage) for 600 tonnes/day. While this may allow flexibility for the applicant to improve efficiencies in the process it would increase truck delivery on some days from 20 to 30no. Is there sufficient capacity in the current buildings on site, which relate to process only, to cater for this increase? The applicant needs to clarify and indicate how this may be achieved on site. If this cannot be demonstrated I would suggest that the current limit of 450 tonnes/day be maintained.

There are contradictions on file relating to intake rates. The letter on file, Attachment 7, 6th October 2022, states that *'the increase daily intake of 600 tonnes'* will not impact the performance of the WWTP.

If the applicant is providing contradictory data as part of the review process this needs to be addressed as part of the review.

4. Attachment 9G- Flow Process

The thermal oxidiser process flow chart shows that the system has a through-put of 20,000kg/h. Can this figure be clarified with the applicant ? If the 20 tonnes/hour is the capacity of the thermal oxidiser then the plant would have to operate on a 24 hour shift.

5. Operation of Thermal Oxidiser

The operation of the thermal oxidiser requires significant fuel load and it is stated in attachment 9D that it uses 6,206,036m³ of gas per annum and that the back-up boiler uses 988,762 litres/annum diesel. The plant efficiency depends on the running costs, of which the fuel load is critical.

There are contradictions within the applicant documents regarding the efficient operating temperature of the thermal oxidiser which impact odour and air emissions.

Applicant attachment 9H, SOP Main Odour system (6th October 2022), under section 'start up procedures' states that the thermal oxidiser must be at operating temperature 850 deg. C before commencement of processing.

Under the information submitted under attachment 9F(i) the applicant argues that the thermal oxidiser can operate for complete odour destruction at temperatures of 700 deg.C with a subsequent fuel reduction of 15%.

If the reduced TO operating temperatures result in increased odours this cannot be acceptable as part of the licence review.

6. Confidential Documents

The applicant submitted documents which it considered to be confidential.

The EPA determined that this was not confidential and that *'this information is necessary for the processing of the Agency Initiated Review'*, uploaded to the portal on 28th November 2022.

These documents have not been uploaded to the portal as yet and may impact on further issues to raised as part of the review process.