

MEMORANDUM

TO: The board of the Agency
FROM: Jonathan Derham
SUBJECT: **Proposed Determination for Pig slaughtering plant operated by Irish Country Meats at Ruskey, Co Roscommon.**
DATE: 18/6/97

Applicant: Irish Country Meats Ruskey Ltd,
Ruskey
Co Roscommon

Reg. No: 182

Status of Activity: Existing Activity, 453 employees

Class of Activity: 7.4 The slaughter of animals in installations where the daily capacity exceeds 1500 units and where the units have the following equivalents - 1pig = 2 units.

Application:

Lodged	01 October 1996
Article 11(2)(b)(ii) request	29 November 1996
Article 11(2)(b)(ii) reply	2 April 1997
Article 17 Notice sent	21/5/97
Article 17 Notice Reply	10/6/97

Site visit: The site was visited on 9/7/96 by myself and on 15/3/97 by B O'Shea from EPA Castlebar.

Local Authority: Roscommon County Council

The Company: Irish Country Meats Ruskey Ltd, is wholly owned subsidiary of Avonmore Group plc.

The Activity: The factory processes c. 12,000 pigs per week. The slaughter line has a capacity of 360 pigs per hour. Processing briefly comprises Slaughtering, Cleaning (scalding, de-haring, singeing, polishing), Evisceration, Cutting/Boning, Packing & Dispatch. The only raw materials are pigs, packaging materials, LPG, cleaning agents and food additives. 100% of the animal is turned into product either directly on site or off-site at a rendering facility. This site also cures (bacon) approximately 20% of its product. The curing process involves injection and immersion of pork in a brine solution. Approximately 100t per week of meat is processed in the on-site cannery. Refer to Appendix 1 of this report for plan and other relevant information relating to the activity.

Permits: The company operated under a Local Government (Water Pollution) Act trade effluent licence issued by Roscommon Co. Co. (ref:WP-1-8A) for discharge to the River Shannon.

Environmental

Controls: Water: On site process effluent treatment plant for all process water.

Emissions:

Air: There are two significant air emission points. These are the vents associated with two adjacent boilers. Both boilers burn oil. One operates on HFO the other on a LFO, however in both cases the oils they purchase can have Sulphur contents up to 3.5% and 3.2% respectively. Preliminary stack height assessment indicates that the boiler stacks may be short of that recommended. It is therefore necessary to get the licensee to model the boiler emissions and implement any necessary improvements. Conditions 5.1 and 5.2 of the PD specifically address this point.

Process Effluent: The factory discharges up to 2275m³/day of process effluent to the WWTP. It would be characterised by high BOD, Ammonia, Nitrate, Nitrite and Phosphorus. Waste water is derived from washdown at slaughter and process areas, canning plant, truck washings and lairage. The treatment efficiency of the WWTP is not far off achieving BATNEEC. However this is very dependant on the kill rate in factory. The effluent monitoring requirements in Schedule 1 of the PD require the regular monitoring of loads into as well as out of the plant. It will therefore be possible to determine the treatment efficiencies as well as period of overload. The slaughtering business runs from contract to contract. Historically when a large contract (purchase order) came in, the company would increase the kill rate to meet the order. This had major implications for the WWTP cope with the load. Condition 6.6 requires that within twelve months of date of grant of the licence the company limit the effluent in-put to the WWTP to that amount which the plant is capable of handling. This will effectively control productivity. The options for the company would then be;

1. An expanded treatment plant
2. Cap the kill rate
3. Tanker effluent to alternative disposal location.

The company would have to seek the written consent of the Agency for options 1 and 3.

The company have, in Schedule 1(i), been given until January 1999 to achieve BATNEEC requirements for this industry.

The effluent has up to now been discharged to a small navigational canal around Ruskey Bridge. This outfall has recently been moved to a subordinate channel of the River Shannon some 600m north of the bridge. Condition 6.6 of the PD requires the extension of this outfall into the main channel thereby assisting dispersion. Given the dilution's available discharge to the main channel should ensure compliance with water quality objectives set out in the Upper Shannon Catchment Plan.

Waste: The company produce a range of wastes including bones, offal, fat, canteen waste, metal and packaging waste, sludge, etc. The only hazardous waste generated on site would be waste oils and any arisings from diseased animals. Their disposal by approved contractors is controlled, in condition 7 and schedule 2, The most significant waste produced is the sludge from the WWTP, which amounts to 2.600 tonnes/year. This material has nutrient characteristics which would benefit agriculture. The licensee withdrew from their application

proposals to landspread this material. It is currently going to landfill. The applicants wished the option to landspread the waste at some time in the future should agreement be reached. Therefore conditions 7.6 and 7.7 as well as Schedules 2(iv) and 2(v) are included in the PD.

Noise There are no significant noise sources on site. Condition 8 sets standard daytime & night-time limits for noise.

Submissions: Twenty-one submissions in relation to this application were received by the Agency. Nineteen of these submissions related to objections to proposed landspreading of WWTP sludge on lands at Laragan and Greyhill. The applicant subsequently withdrew from their application this proposal. Consequently it is not necessary to consider nineteen of these submissions as they relate to aspects no longer part of the IPC application.

There are two relevant submissions.

Department of the Marine letter dated 30/10/96

The Department commented that they usually insist on a BOD/SS limit of 20/30 for discharges to surface water. The submission goes on the comment that the Department is particularly concerned with rising levels of phosphorus in the majority of watercourses and recommend that the most stringent requirements be incorporated in the licence.

Response: Schedule 1(i) sets BOD/SS limits of 20/25 from January 1999. Up to that point the limit is 30/30. In addition a P limit of 2mg/l has been included. Comprehensive monitoring of the effluent including toxicity testing has been included in the licence. These provisions should satisfy any concerns of the Department.

Western Health Board letter dated 14/11/96

The WHB listed four concerns.

1. Health risk from offal in storage and transport.
2. Proper functioning of WWTP. BOD monitoring.
3. Clean truck wash facilities.
4. There should be adequate measures to ensure no pollution of watercourses, in particular the Shannon.

Response:

Conditions 7.1, 7.2 and 7.3 address concern No. 1.

Conditions 6.2 and 6.5 as well as Schedule 1(ii) address concern No.2.

Conditions 9.1.1, 9.1.5, and 9.2.5 address concern No. 3.

Conditions 6, 9, 10 and 12 as well as schedules 1, 3 and 4 include comprehensive provision for the general concerns expressed in No. 4 above.

Recommendation: The proposed determination as submitted to the Board be approved.

Signed _____

Dated: 18/6/97

Dr Jonathan Derham

Appendix 1

Information on the Activity