

 <p>Environmental Protection Agency An Ghníomhaireacht um Chaomhú Comhshaoil</p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
ENVIRONMENTAL LICENSING PROGRAMME	
TO:	Eimear Cotter, Director
FROM:	Orla Harrington, Inspector, Environmental Licensing Programme
DATE:	13 June 2018
RE:	Technical Amendment to Industrial Emissions Licence Register Number: P0947-01, Staunton Foods Limited, Spital Cross, Timoleague, Bandon, Co. Cork.

Background

Staunton Foods Limited (hereafter referred to as Staunton's) operates a pig slaughtering, boning and processing facility on a 2.2-hectare site, 1km south of Timoleague in West Cork. The site is bounded to the west and north by local roads, to the east by the Spital Stream and to the south by farmland. Up to 1,300 male pigs/day are slaughtered typically at 24-26 weeks old (70-90kg) with most pigs sourced locally. The business was founded in the 1950's as Michael Staunton & Sons Ltd. Staunton's has been a wholly owned subsidiary of Barryroe Co-Operative Society Ltd since 2004.

The installation was granted an IE licence on the 08 October 2015 for the following activities:
7.4.1: *The operation of slaughterhouses with a carcass production capacity greater than 50 tonnes per day, and*

7.8(a): *The treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from: (i) only animal raw materials (other than exclusively milk) with a finished product production capacity greater than 75 tonnes per day.*

The activities operate Monday to Friday and there are approximately 157 staff employed.

Technical Amendment Request

A technical amendment to the licence was sought by Staunton's on the 18 December 2017 to extend their site boundary from that described under Condition 1.3 of their existing licence (P0947-01). The purpose of the extension is to facilitate the operation of a new modern wastewater treatment plant (WWTP) capable of meeting the limits specified in their licence. On the 15 August 2017, the licensee received planning permission (ref no 17/00162) to build a WWTP and a letter from Cork County Council, dated 09 November 2017, was provided by the licensee in support of the TA request stating '*I can confirm that an EIA and an NIS were not required as part of this planning application*'.

The new site boundary is clearly defined in red on drawing no 18043/02 entitled '*site plan showing all surface water*', received by the Agency on the 08 May 2018 (refer to Appendix 1). For comparison purposes, the new WWTP is shaded in purple and will include a balancing tank, sludge tank, dissolved air flotation (DAF) unit and sludge press, which will replace an old plant that is no longer considered fit for purpose.

Compliance History and Consultation with the Office of Environmental Enforcement (OEE)

I have consulted extensively with OEE Inspector, Pamela McDonnell, in relation to this technical amendment request. I carried out a site visit to the installation on the 22 February 2018.

A compliance investigation (CI001449) was opened on 14 March 2017 as discharges from the existing WWTP had been significantly exceeding the specified emission limit values (ELVs) in the licence for emissions to water (emission point no: SW4-A). The licensee initially attempted to bring the WWTP back into compliance but failed due to the plant being significantly overloaded.

The CI was closed on the 06 December 2017, as the licensee ceased discharge from the WWTP to the Spital Stream in March 2017 and are currently transporting all process effluent to the Irish Water Carrigtwohill Municipal Waste Water Treatment Plant (D0044-01) for treatment.

The Agency approved a proposal from the OEE to initiate legal proceedings against Staunton's, mainly in relation to their management of process effluent emissions onsite. A court case is scheduled for 19 June 2018. The alleged breaches are summarised as follows:

- Non-compliant emissions to water;
- Unauthorised discharge of contaminated water from process yard;
- Emission of environmental significance at storm water emission point SW2;
- Inadequate material storage.

To resume effective on-site treatment of process effluent generated by the activity, the licensee sought and was granted planning permission for a new WWTP. These works are currently progressing onsite, with a view to being completed towards the end of 2018.

The OEE have no issue with the proposed amendment but have requested the inclusion of a continuous ammonia monitor on the emission to water as well as an increase in monitoring frequency from weekly to daily for Total Nitrogen, Nitrate, Total Phosphorus and Orthophosphate. This is considered appropriate given the compliance history of the site and can be revised once the licensee has demonstrated they can meet the ELVs.

Technical assessment

There is a licensed maximum discharge to water of 120m³/day from the installation, along with specified limit values which were determined with the aim of complying with the Surface Waters Regulations S.I. No. 272 of 2009 and achieving 'Good' status in the receiving waterbody. The emission consists mainly of wash water from production & truck washing areas, contaminated surface water from the yard and cooling water.

In the past, wastewater arising at the installation was treated in an on-site WWTP prior to discharge via SW4-A, to the Spital Stream just upstream of the Spital Bridge (Emission Point Reference SW4-A; note the Sampling Point is at SW4-B). As discussed, the WWTP became overloaded, resulting in exceedances in the ELVs. In March 2017, the discharge from the site was halted and the company began transporting the process effluent offsite to be treated at the WWTP in Carrigtwohill (D0044-01). This practice is not a long term sustainable option and the licensee got planning for (& are currently constructing) a new WWTP, outside the existing site boundary.

In order to regularise the situation, the licensee proposes to extend the existing boundary of the installation to facilitate the operation of a new WWTP within a revised licensed site boundary, and have submitted a site layout plan to reflect this change. All process effluent fed through the new fully automated WWTP will discharge via the existing emission point, SW4-A, which will be retained. The new WWTP is expected to significantly improve the treatment capability of the site and be operational by the end of 2018. According to the licensee, Irish Water will continue to tanker off the process effluent until the new WWTP is fully commissioned, operational and meeting the specified limits.

There are no changes to the discharge to water proposed by the licensee as part of the TA request and the boundary change will not result in new emissions to the environment from those already licensed under P0947-01.

The site boundary change has been addressed in the TA through amending Condition 1.3. I recommend the inclusion of a test programme (Condition 6.18) for the new WWTP, amend firewater retention (Condition 3.10) to assess the impact of including additional land/buildings, increased monitoring frequency and the installation of an on-line Ammonia monitor on SW4-B to ensure sufficient control on this emission point. This will give the licensee an opportunity to demonstrate compliance with the ELVs before recommencement of discharge will be approved by the Agency (*Schedule B.2 Emissions to Water*).

All surface water drainage from this area is collected and discharged via the existing installations surface water drainage system. The licence, at present, specifies a requirement to monitor three storm water emission points (SW1, SW2, SW3) for pH, COD, Conductivity and visual inspection. Condition 3.9 specifies a requirement to maintain an oil separator on the storm water discharge SW1 only. Following discussions with the licensee, the condition has been amended to ensure all storm water discharges from the installation will pass through an oil separator prior to discharge, consequently eliminating any risk to receiving water from onsite activities (i.e. truck deliveries etc.).

Appropriate Assessment

The Agency determined that an Appropriate Assessment was required when assessing the current licence (P0947-01) and required the licensee to submit a Natura Impact Statement.

The installation is not located within a European site. There are several European sites within the vicinity of the installation. These are Courtmacsherry Estuary SAC (site code 001230), Courtmacsherry Bay SPA (004219), Seven Heads SPA (004191) 5.7km southeast of the installation (and 10km downstream), Clonakilty Bay SAC (000091) and Clonakilty Bay SPA (004081) 5.8 km to the southwest, and Galley Head to Duneen Point SPA (004190) 9km to the southwest. Courtmacsherry Estuary Special Area of Conservation (SAC) and Courtmacsherry Bay Special Protection Area (SPA) are within approximately 10m of the installation boundary, downstream of Spital Bridge. The discharge from the on-site wastewater treatment plant is to the Spital Stream approximately 10m upstream of these sites.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activities, individually or in combination with other plans or projects are likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Sites at Courtmacsherry Estuary SAC (site code: 001230) and Courtmacsherry Bay SPA (site code: 004219).

The activities are not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it can be

excluded, on the basis of objective information, that the activities, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was not required.

It has been determined that this installation is not likely to have a significant effect on the European Sites as the proposed changes do not alter emissions at the installation, or effect in any way, the discharges from the installation that are currently licensed to the Spital Stream, Argideen Estuary.

Recommendation

By extending the site boundary to include the WWTP, the amended licence will not permit any increase in emissions from the installation.

I recommend that the Agency agree to a Technical Amendment of the Staunton Foods Limited IE licence (P0947-01) under Section 96(1)(c) of the EPA Act, as amended. In particular, the change provided for in the proposed TA will ensure the operation of the WWTP is controlled/monitored in accordance with licence register no P0947-01.

I am satisfied that the requested change to extend the site boundary to include a new wastewater treatment plant will not result in the relevant requirements of Section 83(5) of the EPA Acts, as amended, ceasing to be satisfied.

Signed



Orla Harrington
Inspector

Appendix 1 – Boundary Map

