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On behalf of Anglo Beef Processors Ireland Unlimited Company

15/11/2021

Reg. No.: P0040-03

Section 90 of the Environmental Protection Agency Act 1992 as amended, in respect of a licence review from Anglo Beef Processors Ireland Unlimited Company for an installation located at Anglo Beef Processors Ireland Unlimited Company t/a ABP Proteins Waterford, Christendom, Ferrybank, Waterford.

Dear Sir or Madam,

I refer to the review form of your Industrial Emissions licence, which was received by the EPA on 22 September 2021.

The licensee stated as part of this review that 'the company currently has a capacity to take in for processing 375 tonnes per day. This has resulted in material not being accepted by the installation as this limit would be exceeded. As the company has adequate processing capacity (in excess of 600 tonnes per day), the company is seeking to increase the daily intake capacity to 600 tonnes. The Agency would like to confirm this increase in processing capacity cannot be considered as part of this review. A full licence review application will have to be submitted by the licensee.

I am to advise that in accordance with the provisions of Section 90(7) of the EPA Act 1992 as amended, you are requested to submit the following additional information so that the Agency may complete a comprehensive assessment of the review:

1. Provide a copy of the company registration certificate. (Regulation (9)(2)(i))
2. Provide a licence boundary map, excluding installation Reg. No. P0205-02. (Regulation (9)(2)(a))
3. Provide the quantity of each type of animal by-products, as set out in the European Waste List established by decision 2000/532/EC, processed on site during 2019 and 2020. (Regulation (9)(2)(i))

4. Provide details of the complete industrial process that takes place within the installation boundary, to include specifics as to what air emissions go to what air abatement. (Regulation 9)(2)(g))
5. Provide details on all planning permissions granted for the development of the thermal oxidiser within the installation boundary (planning reference numbers, planning permission and planner's reports etc). If it is considered that the thermal oxidiser is exempt from planning, provide a letter from Waterford City and County Council confirming that. (Regulation 9(2)(e))
6. As there was storage of oil previously on site and storage of diesel currently on site, the site should be screened in to complete a baseline report. In the case of an activity that involves the use, production or release of relevant hazardous substances (as defined in section 3 of the EPA Act 1992 as amended), and having regard to the possibility of soil and groundwater contamination at the site of the installation, provide a full Baseline Report having regard to European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EC on industrial emissions (2014/C136/03). This shall include soil and groundwater monitoring for parameters that are indicative of the existing relevant hazardous substances (RHS) on-site. (regulation 9(2)(n))
7. Provide a letter from ABP Limited, Waterford, Reg. No 205-02, confirming that the WWTP is suitably constructed to cater for the anticipated reduction in wastewater volume/increase in emission limit values and that this will not negatively impact the operation and/or performance of the WWTP. (Regulation 9)(2)(k))
8. Provide data on water usage on site (m<sup>3</sup>/year) for the years 2019 and 2020. Confirm the source of the water supply and the abstraction rate if relevant (mains, groundwater well etc.). (Regulation 9 (2)(f))
9. In relation to air emissions (Regulation 9(2)(k) & 9(2)(g))
  - b. Clarify how many boilers are in operation on site, the combustion fuel type, national grid references of each, stack height, proposed emission limit value and confirmation of the thermal input of each (MW). Provide maximum volume to be emitted per day (m<sup>3</sup>/day) and per hour (m<sup>3</sup>/hr) from each boiler. Provide details of any recent monitoring results associated with monitoring of boiler emissions at the installation.
  - c. Confirm if non-condensable gases and tallow are combusted in the existing boilers.
  - d. Provide details on the main fuel(s) used at the site and quantities used per annum.
  - e. Provide the design specification (to incl. the percentage reference oxygen), the minimum discharge height, national grid reference (easting and northing), maximum volume to be emitted per hour (m<sup>3</sup>/hr), and maximum RTO capacity (kg/h) of the regenerative thermal oxidiser installed at the installation.

- f. Update an assessment of the impact of emissions to air (to include NO<sub>x</sub>, SO<sub>x</sub>, particulates, NH<sub>3</sub>, odour and TVOC) from the installation (incl. main emissions from boilers and thermal oxidiser) supported by an updated air dispersion model having regard to 'Air Dispersion Modelling from Industrial installations Guidance Note (AG4)' (EPA). Provide evidence that the annual critical level for the protection of vegetation and natural ecosystems for NO<sub>x</sub> will not be exceeded. Assess the impact of ammonia and nitrogen deposition and provide evidence that there will be no impacts from ammonia and nitrogen emissions from the installation on European sites. Assess the predicted compliance with the odour standard 1.5 OU<sub>E</sub>/m<sup>3</sup> as a 98<sup>th</sup>ile of hourly averages at the worst-case sensitive receptor, in accordance with the Agency's guidance document AG9.
  - g. Detail all the abatement systems (to incl. biofiltration system and thermal oxidiser) on all main emissions to air. Confirm if there is a separate biofilter and chemical scrubber operational on-site. Provide the efficiency rating/specifications (in tabular form) for all air abatement equipment associated with the activity.
  - h. Provide a copy of the maintenance schedule/programme for the air abatement systems (to incl. biofiltration system, thermal oxidiser) and include details of what measures are in place to prevent and identify abatement failure e.g. bag filter failure.
10. Tabulate any relevant BAT conclusions from the following
- a. BREF on Slaughterhouses and Animal By-products Industries.
  - b. BREF on Energy Efficiency, 2009
  - c. BREF on Emissions from Storage, 2006

For all applicable conclusions on BAT, state if it is already in place at your installation or if it is proposed to be put in place, also provide a proposed timeline for implementation. Details of any proposals must be provided. Where you do not propose to meet the requirements of a particular BAT conclusion, provide reasons and a justification. (Regulation 9(2)(h))

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)http://www.epa.ie/pubs/forms/lic/industrial%20emissions/licenceapplicationformguidance.html](http://www.epa.ie/pubs/forms/lic/industrial%20emissions/licenceapplicationformguidance.html).

**It should be noted that where there is failure to comply with the above requirements within eight weeks of this notice, the EPA may proceed with its consideration of this application in the absence of the information requested.**

Yours faithfully,

Environmental Licensing Programme  
Office of Environmental Sustainability  
Tel: 053 - 9160600