

## ***ABP Group Environmental***

***Kilcommon,  
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Office of Environmental Enforcement,  
Southeast Region,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle,  
Co. Wexford.

06<sup>th</sup> October 2022

Our Ref: ABP WPRO 06102022

Your Ref; P0040-03

To whom it may concern,

- 1. Provide a copy of the company registration certificate. (Regulation (9)(2)(i)).**

Attachment 1

- 2. Provide a licence boundary map, excluding installation Reg. No. P0205-02. (Regulation (9)(2)(a)).**

Attachment 2.

- 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)).**

Attachment 3 (confidential)

- 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)).**

Attachment 4.

- 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)).**

Attachment 5

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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)).**

Attachment 6 (A – H)

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)).**

Attachment 7.

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)).**

Attachment 8.

9. **(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.**

Attachment 9B

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**(c.) Confirm if non-condensable gases and tallow are combusted in the existing boilers.**

Attachment 9C

**(d.) Provide details on the main fuel(s) used at the site and quantities used per annum.**

Attachment 9D

**(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.**

Attachment 9E

**(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 OUE/m<sup>3</sup> as a 98th%ile of hourly averages at the worst-case sensitive receptor, in accordance with the Agency's guidance document AG9.**

Attachment 9F ( i – iv). The odour assessment will follow on in due course

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**(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.**

Attachment 9G.

**(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.**

Attachment 9H(i), 9H(ii).

**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)).**

Attachment 10(i), 10(ii), 10(iii).

I trust this is to satisfaction of the Agency.

Yours sincerely,



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John Durkan,  
Environmental Manager.