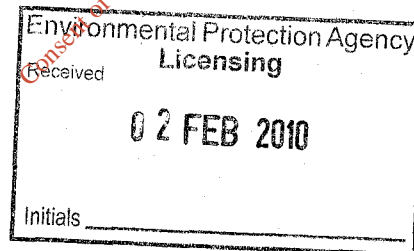


ENVIRONMENTAL MANAGEMENT SERVICES

Objection to the Environmental Protection Agency on behalf of the Ballinasloe Environmental Alliance in Relation to the Application by Premier Proteins (2000) Limited for a Review of the Company's Integrated Pollution Control Licence

IPPC Licence Register Reference P0045-06

SUBMITTED ON BEHALF OF THE BALLINASLOE ENVIRONMENTAL ALLIANCE



Environmental Management Services

**Outer Courtyard, Tullynally,
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02 February 2011



Environmental Management Services
Comhairleoirí Comhshaoil
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02 February 2011

Administration,
Waste Management Licensing,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Dear Sir,

**Objection to the Environmental Protection Agency on behalf of the
Ballinasloe Environmental Alliance in Relation to the Application by
Premier Proteins (2000) Limited for a Review of the Company's Integrated
Pollution Control Licence**

IPPC Licence Register Reference P0045-06

In response to the Agency's proposed determination to refuse the application by Premier Proteins (2000) Limited for a revised IPPC licence for the company's existing rendering plant at Pollboy, the Ballinasloe Environmental Alliance has requested Environmental Management Services to make a submission to the Agency in support of the decision and to ask the Agency to:

- i) take into account further information about the effects of emissions from the rendering plant on local residents' quality of life and health;
- ii) underpin, strengthen and expand the Agency's reasons to refuse to issue a revised IPPC licence; and,
- iii) confirm its proposed decision and refuse to grant a revised IPPC licence.

In addition, and in order to provide a further opportunity to express their concerns about the applicant's plans to expand its waste intake, the Ballinasloe Environmental Alliance has asked Environmental Management Services to request the Agency to hold an oral hearing of the objections against the proposed decision. We consider that there are adequate reasons to hold an oral hearing into the Agency's proposed determination and the submissions received by the EPA in connection with the application and the proposed decision, especially as Ballinasloe Town Council has also expressed concern about the application, and has welcomed the Agency's decision, but has expressed disappointment that the Council was not formally notified about the application for a review of Premier Proteins' IPPC licence.



Environmental Management Services
Comhairleoirí Comhshaoil
Environmental and Planning Consultants

The address of the Ballinasloe Environmental Alliance is:

**c/o Ms Anita Killeen,
Hon. Secretary, Ballinasloe Environmental Alliance,
9 Riverside View,
The Pines,
Ballinasloe,
County Galway.**

The sum of € 126.00 in payment of the statutory objection fee is attached, together with the further amount of € 100.00 for requesting an oral hearing, making a total of € 226.00.

Yours sincerely,

Jack O'Sullivan.

Jack O'Sullivan

Environmental Management Services

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ENVIRONMENTAL MANAGEMENT SERVICES

Objection to the Environmental Protection Agency on behalf of the Ballinasloe Environmental Alliance in Relation to the Application by Premier Proteins (2000) Limited for a Review of the Company's Integrated Pollution Control Licence

IPPC Licence Register Reference P0045-06

1. INTRODUCTION

On 14 September 2009, Premier Proteins (2000) Limited applied to the Environmental Protection Agency for a review of the company's current Integrated Pollution Prevention and Control Licence (Reference P0045-05), for the following reasons:

- i) to permit the existing rendering plant to process a wider variety of waste streams;
- ii) to increase the quantity of wastes to be accepted for processing; and,
- iii) to permit the installation and operation of a second thermal oxidiser to treat the highly odorous emissions from the cooking process.

The application stated that the additional material to be accepted at the plant would include a variety of wastes from:

- food processing and dairy industries;
- various organic chemical processes;
- the pharmaceutical industry;
- aerobic and anaerobic processing of municipal and other wastes;
- landfill leachate;
- street cleaning residues; and,
- septic tank sludge.

These wastes would be processed in addition to the currently accepted wastes, which include meat plant wastes, some food production and processing wastes, sludges, waste oil and fats, and grease trap waste. The most contentious of the existing waste streams comprises offal from animal slaughtering plants, and this waste is considered to be the source of the most noxious odours emanating from the rendering plant.

The plant has a history of odour emissions which have caused considerable nuisance and widespread public concern, especially about the potential ill-health consequences of the emissions. Even though the rendering plant is located approximately 1.4 km south-east of the town centre of Ballinasloe, the odour from the plant frequently permeates the town; while residential housing estates closer to the plant suffer much more frequently from odours at a higher intensity.

The result of these odour emissions has been a steady flow of complaints from residents and business owners to the Environmental Protection Agency, which is responsible for licensing the rendering plant (further details in section 5.1 below). The Agency's Office of Environmental Enforcement (OEE) has issued a very large number of Non-Compliance Notifications, while site audits and site inspections by the OEE identified significant odour problems, discharges to water, and general problems with the management of the plant.

As a result of these non-compliances with the conditions of the rendering plant's current IPPC licence, the Environmental Protection Agency took legal action against the plant operator, resulting in two successful prosecutions in the District Court, principally for failing to control odours at the facility (further details in section 5.2 below). Local residents gave evidence in these cases, confirming that the company's failure to comply with licence conditions were also causing very considerable nuisance and distress.

As a further consequence of this history of odour emissions and breaches of licence conditions, the EPA responded to the licensee's current application for a review of the IPPC licence by issuing on 06 January 2011 a proposed decision to refuse the application; i.e., to refuse to grant a revised licence.

The Agency's proposed decision has been welcomed by the Ballinasloe Environmental Alliance and by Ballinasloe Town Council, as well as by local residents and members of the public. In response to the Agency's decision, the Ballinasloe Environmental Alliance has requested Environmental Management Services to make a submission to the Agency in support of the decision and to ask the Agency to:

- i) take into account further information about the effects of emissions from the rendering plant on local residents' quality of life and health;
- ii) underpin, strengthen and expand the Agency's reasons to refuse to issue a revised IPPC licence; and,
- iii) confirm its proposed decision and refuse to grant a revised IPPC licence.

In addition, and in order to provide a further opportunity to express their concerns about the applicant's plans to expand its waste intake, the Ballinasloe Environmental Alliance is requesting the Agency to hold an oral hearing of the objections against the proposed decision.

We are therefore attaching to this submission our payment of the statutory fee of €126.00 for making an objection and €100.00 for requesting an oral hearing, i.e., a total of €226.00.

2. BALLINASLOE ENVIRONMENTAL ALLIANCE

The Ballinasloe Environmental Alliance was established in October 2007 following a series of public meetings attended by people living in and around the town of Ballinasloe. These meetings were held because of increasing concern about the almost continuous odour nuisance and other environmental problems caused by the rendering plant operated by Premier Proteins at Pollboy and because of the frequent breaches by the company of the conditions attached to the plant's IPPC licence issued by the Environmental Protection Agency.

These public meetings were attended by residents, business people and representatives of civic bodies from the vicinity of the Premier Proteins facility and from the Ballinasloe area generally. Local residents and other persons attending these meetings expressed considerable frustration and concern about the continuous and offensive odour emissions, noise levels and the mode of transport of raw materials to the facility. The aim of the Ballinasloe Environmental Alliance (BEA) is therefore to ensure that Premier Proteins comply in full with the conditions required by the company's IPPC licence, as issued by the EPA.

Following the news that an application was being made to the EPA by Premier Proteins for a review of the company's IPPC Licence, and that the company was seeking permission to accept a wider variety of wastes and an increase in its waste intake, the BEA decided to examine the application and to determine whether, if granted, it would result in further or increasing odour nuisance, and other detrimental consequences.

As result of examining the review application, and taking into consideration the history of nuisance odours from the rendering plant and failure to comply with licence conditions, the BEA concluded that the proposed increase in the variety and quantity of wastes would be very likely to add to and increase the existing odour nuisance, traffic problems, noise and other emissions to the atmosphere which detrimentally impact on the lives of local residents and townspeople.

The proposed decision by the EPA to refuse to grant the revised IPPC licence is therefore welcomed, but it was agreed that an "objection" should be made to the Agency in support of the proposed decision; and the Ballinasloe Environmental Alliance requested **Environmental Management Services** to make an objection to the Agency and to request an oral hearing.

The address of the Ballinasloe Environmental Alliance is:

**c/o Ms Anita Killeen,
Hon. Secretary, Ballinasloe Environmental Alliance,
9 Riverside View,
The Pines,
Ballinasloe,
County Galway.**

3. Location of the Existing Rendering Plant

The Premier Proteins rendering plant is located 1.4 km south-east of the town centre of Ballinasloe, in an area south-west of the River Suck which was formerly rural in character, and where farmhouses and farm buildings comprise some of the older building stock. The rendering plant site extends over a total area of approximately 8.3 hectares, and is located in an area zoned as industrial in the Ballinasloe Development Plan.

The rendering plant is located on an esker (the Esker Riada), which remains a landscape feature of historical and geological interest, even though it has been extensively damaged by unrestrained and unsuitable development works. Part of the rendering plant site (approximately 0.94 ha) lies within the River Suck Callows Natural Heritage Area (NHA) and proposed Special Protection Area (SPA). The plant abstracts cooling water from the River Suck, and the water is discharged back to the river. Treated industrial effluent generated on the site is also discharged to the river Suck.

These nature conservation sites are therefore very vulnerable to any run-off, discharges or emissions which would affect their conservation objectives or value. As we will note in section 5 below, the rendering plant has on at least one occasion discharged to the River Suck effluent which has exceeded the emission limit values set out in the company's licence.

Within recent years, the rural character of the area has been changed to mainly residential as a result of the construction of a large number of new dwellings to the south-west, west and north-east of the rendering plant. These residential estates include Cúil na Canalacht, Oak Glen housing estate and others; and the nearest houses are within 100 metres of the Premier Proteins plant boundary. The nearest houses at "The Pines" and "Riverside Lawn", in Portnick, on the opposite side of the River Suck, are located no more than 280 metres north-east of the rendering plant, and are therefore downwind from the plant under the prevailing wind conditions.

Amenities within 1.0 km of the rendering plant site include the River Suck, Pollboy Bog, the canal and a recently constructed marina close to the town of Ballinasloe. The River Suck is navigable from its confluence with the River Shannon near Shannonbridge; and Ballinasloe is therefore linked to the Shannon/Erne Waterway. Some years ago, the Shannon Boat Rally finished in Ballinasloe at the Lock Gate in Pollboy, south-east of the rendering plant. A 25 berth marina has been completed at Sli na hAbhainn, opposite the Civic Offices, and visiting boats can now reach almost to the town centre. It is a major aim of Ballinasloe Town Council to increase the attractiveness of the town to visitors, whether these come by boat or other transport.

The site of the former Pollboy Landfill is approximately 1.0 km to the south-west of the rendering plant. This landfill operated from the 1970s to 1999 as a local landfill, and from 2000 to 2006 as a regional landfill, during which time it was responsible for emitting significant noxious odours and landfill gas.

On 06 September 2006, the Environmental Protection Agency took a successful prosecution at Ballinasloe District Court against Ballinasloe Town Council under Sections 39 (1) and 39 (9) of the Waste Management Acts 1996 to 2005 for a breach of Pollboy Landfill's Waste Licence (Reg. No. 27-2). The case was taken because of the failure by the Town Council to ensure that odours did not give rise to nuisance either at its facility at Pollboy, or in the immediate area of that facility; and Council was fined € 1,750.00 and had to pay the EPA's costs of € 10,104.00.

The Pollboy Landfill is now closed and fully capped, with a composting facility and a recycling centre in operation on the site; and odour nuisance from the landfill appears to have ceased.

4. Waste Processing at the Premier Proteins Rendering Plant

Premier Proteins has operated since 1953 a rendering plant on the present site at Pollboy, Ballinasloe, County Galway, under the original company name of Burnhouse Ireland Limited. The plant came under the control of the Wilson family from 1969 to 1983, during which rendering continued under the name of Robert Wilson (Ireland) Ltd. In 1994, the IAWS Group took over the plant, and the facility is now part of the One51 Plc group.

The Agency will be aware that rendering of meat plant wastes to produce meat and bone meal is one of the industries most likely to cause intractable odour problems, not only in Ireland, but in many other countries. The process of rendering involves:

- Transport of hard and soft offal to the rendering plant (hard offals are the bony parts of slaughtered animals, while soft offals consist of intestines and their contents together with other internal organs not used for human or animal consumption);
- Following the outbreak of Bovine Spongiform Encephalopathy (BSE), those parts of a slaughtered animal which were most likely to contain appreciable amounts of the infective agent (a prion) were required to be converted to meat and bone meal prior to incineration or co-incineration;
- Reception of the material in a covered area (the raw material shed) where the offal is tipped onto the floor of the plant or into a hopper;
- Crushing and / or grinding of the raw material to reduce the particle size, so as to allow greater heat penetration during the next stage of the process;
- Continuous cooking of the offal mixture, during which large amounts of water vapour are produced, and some of the fat is removed as tallow;
- Pressing the freshly cooked meat and bone meal (MBM) to extract the remaining tallow;
- Sterilisation of the relatively dry MBM;
- Milling the MBM to produce a consistent product;

- Treating the large quantities of high strength wastewater before discharge; and,
- treating the large quantities of highly odorous air and water vapour by means of a bio-filter and/or a thermal oxidiser.

Every one of these process steps, including those intended to control or reduce odour, has the potential to cause significant odour problems as a result of poor design, substandard materials and construction, lack of maintenance, accident or malfunction of equipment, human error or inadequate overall management of the entire process.

We would emphasize to the Agency that, while rendering is a relatively crude process involving large quantities of highly odorous materials, it requires a great deal of care to operate effectively without causing odour nuisance or water pollution. The principal product, meat and bone meal, formerly had a value as a feed supplement for farm livestock, but this outlet ceased with the outbreak of BSE. What was a useful product then became a waste which could not be fed to farm animals and had to be destroyed by incineration or by co-fuelling in a cement plant. Instead of a product to sell, renderers now have to pay to get rid of an unwanted and potentially dangerous material.

The economics of the process did not encourage innovation or high quality management, with the result that a high proportion of older rendering plants became significant sources of malodours and water pollution. The plant at Poolboy falls into this category, as will be clear from the environmental record of the licensed activity.

5. The Rendering Plant's Environmental Record – Complaints and Non-Compliances

5.1 Complaints about Odour from the Applicant's Plant

As mentioned briefly in section 1 above, Premier Protein rendering plant at Poolboy has given rise to a long series of complaints about odour, stretching over several decades. The report dated 14 December 2010 by the Agency's Inspector who examined the applicant's request for a review of the plant's IPPC licence observed that "*since 2008, OEE have received on-going complaints in relation to odour (161 since 01 July 2009)*". We would point out that the complaints listed in Appendix I to the Agency's proposed determination were made by some 51 individually named complainants, clearly indicating the widespread nature of the odour nuisance.

However, it is our submission that the number of complaints is far greater than recorded by the Office of Environmental Enforcement; and in **Appendix I** we are attaching a log of complaints about odour emissions from the Premier Proteins plant, prepared by just one member of the Ballinasloe Environmental Alliance, and covering the period 09 June 2009 to 24 December 2010. Every one of these complaints has been made by telephone to the Agency and has been given a reference number. It would be fair to say that our appended log of

complaints is only "*the tip of the iceberg*", as there are many occasions when other local residents experienced significant malodour, and could have made a complaint but did not do so.

In addition, we have been informed by the member of the Ballinasloe Environmental Alliance who provided the log of complaints attached in **Appendix I** that he has recorded approximately 750 incidences of nuisance odour during the last 10 to 12 years, and that he made approximately 250 complaints directly to the rendering plant, and some 25 – 30 to the EPA.

While we therefore fully agree with one of the Agency's reasons for proposing to refuse the application for a revised licence, namely, "*the high frequency of odour complaints from members or the public*", we would point out that the number of complaints is much greater than recorded by the Office of Environmental Enforcement.

5.2 Failure of the Rendering Plant to Comply with IPPC Licence Conditions, and Successful Prosecutions taken by the EPA

A further reason given by the Agency for proposing to refuse the application for a revised licence is "*the frequency of occurrence of non-compliant odours off-site*".

The report by the Agency's Inspector who examined the applicant's request for a review of the plant's IPPC licence observed that "*an Office of Environmental Enforcement (OEE) Audit in July 2009 and OEE site visits have identified significant issues with the odour abatement, discharges to water and the management of the site*".

We would remind the Agency that other and earlier site inspection reports have also found significant odours and non-compliances. For example, the site inspection report dated 11 September 2008 (which will be in the Agency's files), covering the period 25th and 27th to 29th of August 2008, recorded odours off-site on 34 occasions during those few days. When recording these odour events, the Inspector noted that the odour resulted in significant interference with amenities and the environment beyond the boundary of the licensed facility. Locations affected by the odour included residential premises and commercial premises which were regarded by the EPA as "extra sensitive" because of previous complaints of odour from these locations.

The most obvious conclusion to be drawn from the applicant's record of non-compliances over such a long period of time is that:

- (i) no significant effort was being made by the licensee to address the odour problem; and / or,
- (ii) whatever steps were taken to address the odour problem were ineffective, most probably because the licensee did not have the necessary technical knowledge and skill to understand and operate the air pollution abatement equipment.

We would therefore fully agree with the Agency's conclusion that:

Objection on behalf of the Ballinasloe Environmental Alliance (Reference P0045-06)

- the Licensee has not demonstrated the requisite technical knowledge to carry on the operation of the existing and proposed pollution abatement equipment; and,
- the Agency is not satisfied that the Licensee will operate the proposed scope and scale of installation in a manner that would not cause environmental pollution.

In her report dated 14 December 2010, the Agency's Inspector noted that there were two successful District Court prosecutions in relation to breaches of the Licensee's IPPC licence conditions.

In the most recent of these cases, initially brought before the District Court in Ballinasloe in early May 2008, the Agency alleged that commencing on 02 May 2007 and ending on 01 November 2007, Premier Proteins breached the conditions of the company's IPPC Licence by failing to ensure that all operations on site were carried out in a manner such that odours did not result in significant impairment or significant interference with amenities or the environment beyond the site boundary.

It was further alleged by the EPA that for a period commencing on June 11 and ending 09 October 2007, Premier Proteins failed to notify the Agency as soon as was practicable after the occurrence, of a malfunction or break-down of the control equipment (thermal oxidiser) which was likely to lead to loss of control in the abatement system.

Premier Proteins were also charged that, for the period commencing 11 June 2007 and ending 23 October 2007, they failed to ensure that offensive gases arising from the on-site cookers in the rendering plant were directed to the thermal oxidiser for treatment and that the company sent these offensive gases to an alternative treatment system without the prior agreement of the Agency.

The fourth breach of the licence conditions alleged that Premier Proteins permitted a specific emission to the River Suck which exceeded the emission limit values set out in the company's licence.

On 03 September 2008 at Ballinasloe District Court, Premier Proteins pleaded guilty to two of the above charges, admitted breaching conditions of its IPPC licence by:

- failing to control odours emanating from the facility; and,
- directing off-gases to alternative treatment options without the prior agreement of the Agency.

The result of the proceedings was that Judge Denis McLoughlin imposed a fine of € 1,500 on each charge and awarded the EPA costs of € 8,820. The success of these proceedings, and the previous case taken in 1999 against Premier Proteins clearly indicate that there is a significant on-going problem with odour control and water pollution arising from the Licencee's rendering operation at Pollboy. As long as these problems persist, and there is no reason to believe that they have been effectively resolved, we would submit that the requested

revision of the applicant company's IPPC licence should not be granted by the Agency; and therefore we concur with the Agency's proposed decision.

5.3 Whether or not the Applicant is a "Fit and Proper Person"

In her report dated 14 December 2010, the Agency's Inspector considered in some detail whether or not the applicant, who in this case is also the licensee, should be considered as "*a fit and proper person to hold a licence*", in accordance with Section 83(5)(a)(xi) of the Protection of the Environment Act, 2003.

In the light of the information provided by the EPA, the additional information in this submission, and taking into account the much greater number of complaints made by local residents (see section 5.1 above), we would agree fully with the Inspector's conclusion that she could not "*attach any additional conditions in the review of the licence which could address the concerns of OEE and ensure that the installation could be operated in a manner that the emissions from the activity will not cause significant environmental pollution*", and with her further conclusion that she could not "*consider the applicant to be a fit and proper person for the purposes of the review*".

6. The Licence Review Application

As mentioned briefly in the introduction to this submission (section 1 above), the application sought a change in the current IPPC licence to permit:

- iii) the existing rendering plant to process a wider variety of waste streams;
- iv) an increase in the quantity of wastes to be accepted for processing; and,
- iii) the installation and operation of a second thermal oxidiser to treat the highly odorous emissions from the cooking process.

In addition, the review application requested:

- i) removal of the restriction of 480 tonnes per day, and re-wording of licence condition 8.28 to allow a larger quantity of raw materials (other than animal by-products and other wastes accepted for processing by rendering) to be accepted daily;
- ii) removal of condition 8.26.1 which requires all used cooking oils to be processed by rendering;
- iii) an amendment to Schedule C.4 to change the frequency of monitoring of grease trap waste and sludges from "*per consignment*" to "*per supplier*"; and,
- iv) removal of condition 8.27.1 which restricts the hours within which animal blood and grease trap waste must be delivered and processed.

It is clear from the above request that the licensee is seeking to relieve some of the restrictions placed on his operations by the current IPPC licence; and there

is no indication in any part of the entire licence review application that the applicant is motivated by a desire to become more environmentally compliant, either in terms of limiting odour nuisance or operating within more stringent licence conditions. While we would accept that the installation and operation of a second thermal oxidiser could be further used to improve odour abatement at the rendering plant, there is no indication or reason to believe that the applicant would operate the second thermal oxidiser more efficiently than the existing system.

It is therefore our submission that, if granted, a revised IPPC licence would not serve to reduce the adverse environmental impacts of the existing rendering activity, and in particular would not reduce odour nuisance.

7. Reasons for Objecting to the Granting of a Revised IPPC Licence

7.1 Nuisance Odours

The record of nuisance odours, detailed and commented upon in section 5.2 above, with additional information in **Appendix I**, provides a clear and strong reason for objecting to the granting of a revised IPPC Licence.

7.2 Record of Non-Compliances

The applicant's record of non-compliance, detailed and commented upon in section 5.2 above, provides a second clear and strong reason for objecting to the granting of a revised IPPC Licence.

7.3 Prosecutions

The successful prosecutions taken by the EPA against the applicant, on which we commented in section 5.2 above, provides a third valid and strong reason for objecting to the granting of a revised IPPC Licence.

7.4 Unsuitability and Sensitivity of the Site

When Burnhouse Ireland began operating a rendering plant at Pollboy in 1953, there was no great recognition of the importance of protecting areas of unique or vulnerable habitats or species, and the site would have been located well outside the town of Ballinasloe. Growing awareness of nature conservation, aided by Ireland's necessity to transpose and implement European Union Directives, led to the establishment of SACs, SPAs and NHAs, including the River Suck Callows Natural Heritage Area (NHA) and proposed Special Protection Area (SPA) adjacent to the rendering plant (see section 3 above).

At the same time, the expansion of the town of Ballinasloe led to the growth of housing estates on the perimeter of the town, including the estates to the south-west, west and north-east of the rendering plant. These areas must also be considered as sensitive and vulnerable to noxious odours.

If the rendering plant had operated without causing serious and widespread odour nuisance, there might be a case for granting a revised IPPC licence, on the grounds that the conditions attached to the new licence could be more strict, demanding a higher standard of operation. However, the environmental record of the applicant, the number of odour complaints, and the applicant's failure to comply with existing licence conditions, creates a significant risk to the sensitive and vulnerable areas described above. It would be inappropriate for the EPA to allow this risk to continue, and therefore we would fully support the Agency's proposed decision to refuse to issue a revised IPPC licence.

7.5 Risk to Water quality in the River Suck

There is a risk that the River Suck could be detrimentally affected if the applicant were to be granted a review of the IPPC licence allowing additional waste materials to be processed.

7.6 Traffic Generated by the Rendering Plant

Vehicles servicing the rendering plant, including any additional vehicles transporting further quantities and varieties of waste would add to the nuisance and traffic problems already caused.

The routes taken by vehicles transporting wastes to the existing rendering plant are already a matter of serious concern, as they pass through the town of Ballinasloe, or use the southern relief road, passing the Town Council offices, the recently constructed marina, the Shearwater Hotel and a new retail site which includes Aldi and Tesco stores. Vehicles transporting offal, animal by-products, and wet and dewatered sludges also travel along residential roads around Ballinasloe, and odour from these vehicles has already given rise to nuisance. The Agency should be aware that "Harbour Road" is residential along its entire length between the town and the rendering plant.

Residents of Ballinasloe, especially those living close to roads servicing the existing rendering plant, have endured over many years the offensive odours from vehicles transporting "animal by-products" to and from the rendering plant, along with regular "accidents" which involve parts of slaughtered animals falling off vehicles, and the leaking of noxious liquids from vehicles transporting offal.

7.7 Impacts on Residential Amenity, Quality of Life and Public Health

The Ballinasloe Environmental Alliance and other residents of Ballinasloe have been aware for many years of the adverse impacts on the quality of life and particularly on public health caused by the operation of the rendering plant. The Chairperson of the Ballinasloe Environmental Alliance, Mr. Mick O'Hehir, has on two occasions written to the Health Service Executive expressing concerns, not only about the existing rendering plant, but also about a proposed sludge processing plant which would be located adjacent to the rendering plant, and on the same site. Copies of his letters, to which he has not received replies, are attached in **Appendix II**.

In his letter dated 16 September 2010, Mr. O'Hehir was concerned about the granting of permission by An Bord Pleanála for the construction of a sludge treatment plant adjacent to the existing rendering plant and was worried that this would be a very serious threat to public health. He provided information about two serious incidents of bad odour, "the stench" as he described it, from the existing Premier Proteins 2000 Ltd plant prior to 26 August and on 3 September 2010. On the first occasion, two local schoolchildren and two teachers of Creagh National School became ill and got sick during an open day at the school due to the smell from the plant, and the event was reported in the Connach Tribune. During the second incident, two local window cleaning contractors had to take refuge in a local house of the Pines estate for the same reason.

8. Conclusions

On behalf of the Ballinasloe Environmental Alliance, we concur with the proposed decision of the Environmental Protection Agency to refuse to grant a revised waste licence to Premier Proteins, and we would urge the Agency to be firm in its decision, and to hold an oral hearing.

Jack O'Sullivan

Environmental Management Services

On behalf of the

Ballinasloe Environmental Alliance

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ENVIRONMENTAL MANAGEMENT SERVICES

Objection to the Environmental Protection Agency on behalf of the Ballinasloe Environmental Alliance in Relation to the Application by Premier Proteins (2000) Limited for a Review of the Company's Integrated Pollution Control Licence

IPPC Licence Register Reference P0045-06

**SUBMITTED ON BEHALF OF THE BALLINASLOE
ENVIRONMENTAL ALLIANCE**

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02 February 2011

ENVIRONMENTAL MANAGEMENT SERVICES

Objection to the Environmental Protection Agency on behalf of the Ballinasloe Environmental Alliance in Relation to the Application by Premier Proteins (2000) Limited for a Review of the Company's Integrated Pollution Control Licence

IPPC Licence Register Reference P0045-06

SUBMITTED ON BEHALF OF THE BALLINASLOE ENVIRONMENTAL ALLIANCE

Appendix I

Log of Complaints about odour emissions from the
Premier Proteins Plant, prepared by a member of the
Ballinasloe Environmental Alliance, and covering the
period from 09 June 2009 to 24 December 2010

Environmental Management Services

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02 February 2011

Log of Odour Emissions from Premier Proteins Plant

Date 2009	Time	Odour Description	Phone call & ref no	Reply & comment etc
9 th June	1015		1015 # 8093	Tracy
10 th June	am	+++		Sitting in study, rotten smell wafting in the window
2 nd July	0200			Colm
3 rd July	1830		1830	Rang out
4 th July	1400 1500 1530 1630 1642	+ + + ++ ++	1642 #06394	Op 24
16 th July	0610 0630 0650	++ ++ ++	0650 #6493	Operator 7 "Just after turning on the Thermal Oxidiser"
18 th July	1230 1255		1255 # 6396	Cooking smell
28 th July	1730 1750 1835	++ ++ ++	1835 # 6397	Raw offal smell not cooking smell Operator No 21 "I don't see how it could"
5 th August	1735 1800 1815 1830 1835	+++	1735 # 7100	Operator No 2 p/c EPA no reply
6 th August	All day			Jean couldn't go into garden with the smell
7 th August	All day a/c to Jean 1710 1715 1725 1830		1725 # 8050 1830 no answer	Jean. I came home from work = Operator No 2 "Thermal oxidiser not on"
9 th August	1100 1245 1300 1400 1415		1440 no answer rang out *2 1650 rang out	1650 phoned EPA

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Log of Odour Emissions from Premier Proteins Plant

Date 2009	Time	Odour Description	Phone call Phone call & ref no	Reply & comment etc
	1440 1500 1600 1650			
5 th Sept	2030	++		
18 th Sept	1130 1215 1255 1350 1455	++ ++ ++ ++ ++	1455 # 7109	Operator No 25 "was not aware of a new RTO being installed"
21 st Sept	1900 1930	+ +		
23 rd Sept	1930 1945 2000 2025 2100	+++ +++ ++		
26 th Sept	0920 1125	++ Creagh school ++	1125 #8613	Operator No 23 "2 nd complaint"
2 nd Oct	2100 2120	++		
9 th Oct	2200 2310	++ +++	2310 # 8614	Rotten Operator No 2
24 th Oct	1130 1200 1215 1240	++	1215	Operator No 26 No ref number available
31 st Oct	1500 1510 1525	+++ ++ +++	1525 # 8619	Operator No 1 Jean felt physically sick Had to run from garden
2 nd November	1330 2005 2015 2045			Out for a walk
6 th Nov	1705	+		
20 th Nov	1430 1500 1600 1700			Army down in Pines sandbagging during floods, comment from army personnel - "you have enough to contend with here"

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Log of Odour Emissions from Premier Proteins Plant

				without that smell" (outside Anne Devlins house)
Date 2009	Time	Odour Description	Phone call Phone call & ref no	Reply & comment etc
21 st Nov	1030 1115	++		
Date 2010	Time	Odour Description	Phone call Phone call & ref no	Reply & comment etc
18th March	2315 2345	+++ +++		Out with the dog
21 st March	1205	++		
1 st April	0750	++	0750	Operator No 25 No apology
4 th April	1050 1255	++		
26 th April	1750 1805	+++ +++	1805# 8529	Outside electrical contractor answered phone in Premier plant reference number given at a later date
28 th April	All day			Stink all day according to my wife
29 th April	0838 0900 1110 1120 1807	+++ +++ nauseating ++@ Beagh roundabout +++at home +++	0838.#8528 1807#8534	Operator ? 2 nd call received this am
28 th May	0730 0900 1530 1644	 +++ absolutely vile +++	1530#8549 1644#8551	p/c EPA Dr Mick Henry, interior of house stank after smell abated outside Operator No 25
3 rd June	2100	++ in town at AIB atm		
5 th June	1125	+++	1125# 8649	Operator 23
22 nd June		Stink all afternoon (Jean)		# 8654 Operator 2

Log of Odour Emissions from Premier Proteins Plant

Date 2010	Time	Odour Description	Phone call & ref no	Reply & comment etc
23 rd June	1015	Stink all morning (Jean)	1015	# 7138 Operator No 25 P/C to EPA- Bernie Burke audit done several complaints received
24 th June		++ All am (Jean)		p/c EPA Liam O'Suilleabhán left message
25 th June		Stink all day		My wife
26 th June		Stink all day		# 8658 Operator 23 P/C EPA left message on emergency line
27 th June	1330	++	1330	No reply
1 st July	0930 0945 0953 1455	++ ++ ++ Stink all day +++	0935 1455	# 6422 Angie P/C EPA # 6423 Operator No 27 no apology , I told him he was incompetent, he said "How dare you" I said how dare him keeping me a prisoner in my own home because of the stench and wont offer an apology.. P/C Aishling Ryan EPA 1235
2 nd July	1105 1345 1430 1553 1615 1730 1830 1955 2155 2225	++ ++ ++ +++ ++ ++ ++ ++ ++ ++	1105 2225	# 6424 Operator No 25 "we are putting in new doors". # 8665 Operator 1 P/C 2230 EPA left message on emergency line

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Log of Odour Emissions from Premier Proteins Plant

Date 2010	Time	Odour Description	Phone call Phone call & ref no	Reply & comment etc
3 rd July	1110 1200 1435 1550 1900 2000	++ ++ ++ ++	1110 2000	Operator 1, no reference number available, "We are working on the heather beds" He was not aware that they were advised by EPA to use heather beds as opposed to RTO " You know more than we do" # 6572 Operator 21, P/C EPA @ 2005hrs left message on emergency line.
6 th July	1900 2055 2140	++ ++ ++		
7 th July	0600 0750 2230	++ ++ ++	2230	# 8678 Operator 2 "I cant even open a window", he apologised.
17 th July	1400 1605			
18 th July	1300 1415 1635 1735 0355	+++	1735	# 8683 Operator 23 Jean coming from Golf club "Vile smell"
19 th July				Complaint to EPA re the Algae problem in Moycam, EPA took samples.
24 th July	0950 1000 1037	++	1037	# 8684 Operator 7 "sorry about that" P/C EPA @ 1125 Left message on emergency line, Jim Hurleys voice mail I am on holiday etc.
8 th Sept	1200 2140	Vile – Jean +++ rotten flesh smell	2142	p/c # 8685 Operator 2 "sorry now"

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Log of Odour Emissions from Premier Proteins Plant

Date 2010	Time	Odour Description	Phone call Phone call & ref no	Reply & comment etc
				2145 P/C EPA emergency line. During the day 2 window cleaners had to take refuge in P Maddens house because they felt nauseated by the smell.
9 th Sept	0710	++	1007	In ensuite shaving, smell wafting in window. P/C Aishling Ryan EPA Told her A- Children nauseated during school open day B - 2 window cleaners had to take refuge in local house due to the smell.
18 th Sept	1210 1220 1225 1250	+++ ++ ++ ++	1225 # 8687	Operato No 23 'we are closing down at the minute' 'Sorry'
1 st October	1755	++	1755 # 8466	Operator No 3 'sorry'
22 nd Oct	1422	+++ vile		Smell so heavy that when smell abated outside smell still persisted inside garage even with doors open.
24 th December	1030		1030 # 8692	Operator No1

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ENVIRONMENTAL MANAGEMENT SERVICES

**Objection to the Environmental Protection Agency on behalf of
the Ballinasloe Environmental Alliance in Relation to the
Application by Premier Proteins (2000) Limited for a Review of
the Company's Integrated Pollution Control Licence**

IPPC Licence Register Reference P0045-06

**SUBMITTED ON BEHALF OF THE BALLINASLOE
ENVIRONMENTAL ALLIANCE**

Appendix II

1. Letter dated 16 September 2010 from the Ballinasloe Environmental Alliance to the Director of Public Health, HSE West, Galway
2. Letter dated 11 January 2011 from the Ballinasloe Environmental Alliance to the Director of Public Health, HSE West, Galway

Environmental Management Services

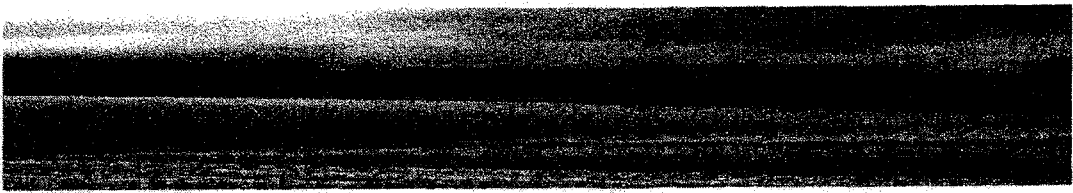
**Outer Courtyard, Tullynally,
Castlepollard,
County Westmeath, Ireland**

Telephone 044 966 2222
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E-mail jackosullivan2006@gmail.com

02 February 2011

O'Leary P. O'Donovan



Ballinasloe Environmental Alliance

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Merlin Park Hospital
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The Pines
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Home 0909642690

16th September 2010

1. Re -Integrated Pollution Prevention and Control Licence P0045-05 Premier Proteins 2000 Ltd rendering plant Ballinasloe .
2. Prospective application from OneBio Ltd for IPPC license from EPA

Dear Dr O'Donovan,

Further to our previous letter to you of 28th October 2009 and your response re the Premier Proteins 2000 Ltd rendering plant in Ballinasloe. A new threat is now being posed to the already compromised public health of the residents of Ballinasloe by the granting on appeal to An Bord Pleanala for the construction of a sludge treatment plant adjacent to the existing rendering plant. This was despite a refusal by Ballinasloe Town Council and An Bord Pleanala's own inspector refusing permission on a number of grounds, one of which was the threat to public health. This is a very serious threat in terms of public health as the cumulative effect of these 2 plants in a largely residential area will be disastrous.

The HSE in its submission to An Bord Pleanala during the process stated, and I quote that "*discharges or emissions* have the potential to cause **significant adverse** impacts on Public Health, and any proposed controls only aspire to mitigate/eliminate potential hazards to human health".

Despite this An Bord Pleanála in refuting its own inspectors report stated that the proposed plant would not be a threat to public health.

I would like to bring to your attention two serious recent incidents where the stench from the existing Premier Proteins 2000 Ltd plant compromised public health. This is in addition to the decades that this plant has compromised the public health of the population of Ballinasloe as outlined in my previous correspondence.

1. During a recent open day at Creagh National School (which has in excess of 400 pupils) two local schoolchildren and two teachers became ill and got sick due to the smell from the premier proteins plant. This is totally unacceptable. This was reported in The Connacht Tribune of the 26th August 2010 (copy attached) where the local Parish Priest Fr Declan McInerney recounted the incident at a public meeting. Creagh National School were one of the objectors to the construction of this new plant and are on record as having made numerous complaints to the EPA regarding odour pollution from the existing Premier Proteins 2000 Ltd Plant.. This serious public health situation can no longer be tolerated by the HSE.
2. The second incident involves two local window cleaning contractors who had to take refuge in a local house in The Pines estate on the 3rd of September due to the smell from the Premier Proteins 2000 Ltd Plant causing them to feel ill.

We are calling on your department once again to take action on two fronts. Firstly to object strenuously to the granting of a revised IPPC licence for the Premier Proteins 2000 Ltd plant which has convictions in the local courts for odour pollution and as pointed out above is continuing to pose a serious threat to the public health of children, families and the population of Ballinasloe and its environs.

Secondly that your department would vehemently oppose the granting of an IPPC license in respect of the proposed OneBio Ltd plant to be built adjacent to the existing Premier Proteins 2000 Ltd plant. Both companies form part of the One51 group.

Can I plead with you to take some action on our behalf and on behalf of the residents of the Ballinasloe area who should not be exposed to this ongoing serious Public Health Hazard.

Should you require any further information or clarification please do not hesitate to contact me on any of the above numbers.

Regards

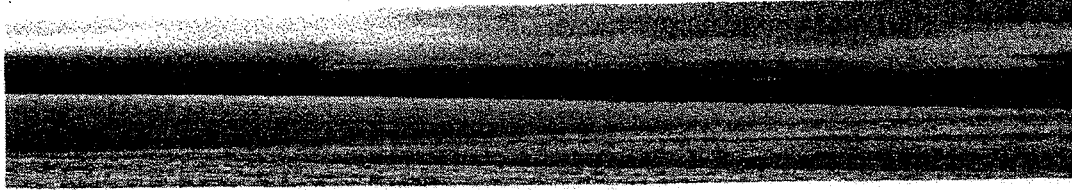
Yours sincerely

Mick O'Hehir
Chair
Ballinasloe Environmental Alliance

Cc: Dr Kevin Kelleher Asst National Director, Health Protection, HSE

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ORIGINAL - RETAINED



Ballinasloe Environmental Alliance

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Director of Public Health
HSE West
Merlin Park Hospital
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4 Riverside
The Pines
Creagh
Ballinasloe
Co Galway
Mob 0868157422

11th January 2011

1. Re -Integrated Pollution Prevention and Control Licence P0045-05 Premier Proteins 2000 Ltd rendering plant Ballinasloe
2. Prospective application from OneBio Ltd for IPPC license from EPA

Dear Dr O'Donovan,

Further to my recent letter to you of 16th September 2010 (copy attached) and previous letter of 28th October 2009 I am concerned that to date I have not even received an acknowledgement of this letter which concerns the ongoing threat to public health being posed by the Premier Proteins 2000 Ltd rendering plant in Ballinasloe.

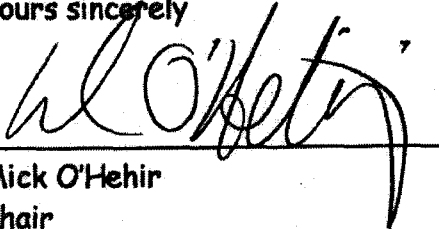
- Can you please indicate that you have received the correspondence from me dated 16th September 2010 and
- Outline what action you propose to take regarding this ongoing threat to public health to the people of Ballinasloe.

As outlined in my letter of 16th September last, children in the local primary school which has over 400 pupils are particularly affected by this ongoing pollution threat to public health.

I await your response

Regards

Yours sincerely



Mick O'Hehir
Chair
Ballinasloe Environmental Alliance

Cc: Dr Kevin Kelleher Asst National Director, Health Protection, HSE
: Mr Martin Devine Asst National Director Environmental
Health

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