The Agency received a request on the 2\textsuperscript{nd} September 2014 to technically amend the Industrial Emissions Licence held by Anglo Beef Processors Ireland, Licence Reg. No. P0039-02. The licensee has changed the location of Biofilter EP 1.2 and requests that the change in location be accommodated in \textit{Schedule 1(i) Emissions to Atmosphere} of the licence by way of technical amendment.

This memo recommends that the change may be accommodated by a Technical Amendment, in accordance with Section 96 (1)(c) of EPA Acts 1992 as amended.

\textbf{1. Background}

On 12\textsuperscript{th} June 1997 ‘Munster Proteins Limited’ was granted an IPPC licence, Register Number P0039-01, for an animal by-products rendering activity located at Kilcommon, Cahir, County Tipperary.

A revised licence, IPPC Licence Reg No: P0039-02 was granted to Munster Proteins Limited on 25\textsuperscript{th} August 2003. The review was to accommodate the following changes to the activity:

- Extended production capacity
- Installation of sterilisation equipment for MBM and Tallow Oil
- Boiler replacement
- Installation of an additional biofilter in the north west corner of the site to abate process gases from the additional production capacity
- An increase in process effluent emissions
- Alternative arrangements for the disposal of sludges arising from the Dissolved Air Flotation(DAF) Unit.

This licence includes several conditions governing odour control.

This licence (Reg No P0039-02) was amended on the 9\textsuperscript{th} November 2005 (Amendment A) under Section 82(11) of the EPA Acts 1992 as amended to insert the term BAT (Best Available Techniques) into the glossary of the licence.

This licence was further amended on the 22\textsuperscript{nd} October 2013 (Technical Amendment B) to accommodate a site boundary change. The licensee changed their name to ‘Anglo Beef Processors Ireland t/a Munster Proteins Limited’ around that time.

Finally, an IED Amendment was issued on the 19\textsuperscript{th} December 2013 to ‘Anglo Beef Processors Ireland’ for the purposes of Section 82A (11) of the EPA Acts 1992 as amended. This amendment gives effect to the requirements of Directive 2010/75/EU (Industrial Emissions Directive) and Directive 2002/96/EC (IED Directive).
Directive) so that the licence is now an Industrial Emissions (IE) licence. The activity currently comprises the rendering of animal by-products and the processing of meat products for the petfood canning industry.

The licensee received planning permission in June 2013 (planning ref 13/71) for the installation of the new animal by-product processing building and biofilter (EP1.2) that is currently authorised by the licence. An Environmental Impact Statement accompanied that planning application.

2. Technical Amendment request

On the 2nd September 2014, the Agency received a request for a Technical Amendment of IE licence P0039-02, in order to allow for a change in location of Biofilter EP1.2 from the north west corner of the site (grid reference 204210E, 123510N) to a location in the north east corner of the site (grid reference 623620E, 604240N), a movement of 50m, in accordance with planning permission ref 13/71. This would require an amendment of the location details of the biofilter in Schedule 1(i) Emissions to Atmosphere of the licence.

In response to a request for further information, the licensee has confirmed that the biofilter was installed in its new location in March 2014. They confirmed that the new location is permitted by the planning permission granted and that the input to the biofilter and the emission volumes, constituents and concentrations from the biofilter has not changed from that reported in the licence review application for P0039-02.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE team in Kilkenny in relation to this technical amendment request. The OEE confirmed that the proposed change in location cannot be accommodated under the existing licence.

4. Assessment

The emissions from biofilter EP1.2 were assessed as part of the last licence review (P0039-02). The main concern with regard to emissions from the biofilter pertains to the potential for odour nuisance beyond the site boundary. Therefore ELVs were set for ammonia, amine, mercaptans and hydrogen sulphide in the licence P0030-02 as outlined below. A range of conditions were also included in the licence with regard to the operation and monitoring of the biofilter and in relation to odour assessment and control.

A review of air monitoring results submitted to OEE in 2015 demonstrates that the emissions of ammonia, amine, mercaptans and hydrogen sulphide from the biofilter at its new location are consistently below detectable levels and/or significantly below the relevant ELVs.

The biofilter has moved 50m closer to the north eastern boundary of the site, therefore the nearest sensitive receptors to the new biofilter are located 200m to the north of the new biofilter location and 240m to the east of the new biofilter location. Since the new biofilter was installed it is noted that two complaints were received by the applicant in relation to odour. One of the complaints, made on 16th October 2015, reported odour experienced at a house on the Mitchelstown Road (to the west of the site). An Environmental Officer from Tipperary County Council investigated in the first instance and found no odour in the vicinity of the house but noted a lingering odour within the house. The licensee carried out an odour check on site and found that no odour was detected and the biofilters were in good working order. The licensee noted that compost/slurry spreading had occurred to the northwest of the site in the days prior to the complaint being made.
The second complaint, made on 19th October 2015, reported odour in an area to the south east of the site and an area in the north west of the site. On investigation, the licensee found that no odour was detected throughout the site, the biofilters were in good working order and that the plant was not in production at the time the odour was experienced by the complainant. The licensee again noted that compost/slurry spreading had occurred to the northwest of the site in the previous week.

OEE assessed the licensee's reports in relation to the complaints and required no further action to be taken. No further complaints have been received by the licensee or OEE.

In light of the monitoring results for the biofilter to date and the lack of odour impact beyond the site boundary since the new biofilter was installed, it is considered that the change in location of the biofilter will not cause a significant impact on the environment beyond the site boundary.

Having reviewed the existing licence (P0039-02), it is considered that the existing conditions in the licence pertaining to the operation and control of the biofilter are sufficient to monitor and control odour emissions from the activity and do not require further amendment.

5. Appropriate Assessment

The only European Sites within 20km of the installation are the Lower River Suir SAC (site code 002137) and the Galtee Mountains SAC (site code 000646) (see details in Table 1 below). Any European sites beyond 20km distance from the installation fall well outside of the potential zone of influence of the proposed activities, so it was not necessary to consider them further.

<table>
<thead>
<tr>
<th>European Site (site code)</th>
<th>Distance/Direction from installation</th>
<th>Qualifying interests</th>
<th>Conservation objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower River Suir SAC (site code 002137)</td>
<td>700m east</td>
<td><strong>Habitats:</strong> Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Mediterranean salt meadows (Juncetalia maritim) Water courses of plain to montane levels with the Ranunculion fluitantis and Calitricho-Batrachion vegetation Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels Old sessile oak woods with <em>Ilex</em> and <em>Blechnum</em> in the British Isles Alluvial forests with <em>Alnus glutinosa</em> and <em>Fraxinus excelsior</em> (Alno-Padion, Alnion incanae, Salicion albae)* Taxus baccata* woods of the British Isles* <strong>Species</strong> Freshwater Pearl Mussel <em>Margaritifera margaritifera</em> White-clawed Crayfish <em>Austropotamobius pallipes</em> Sea Lamprey <em>Petromyzon marinus</em> Brook Lamprey <em>Lampetra planeri</em> River Lamprey <em>Lampetra fluviatils</em></td>
<td>NPWS (2015) Conservation objectives for Lower River Suir SAC [002137]. Generic Version 4.0. Department of Arts, Heritage and the Gaeltacht</td>
</tr>
</tbody>
</table>
Having considered the changes proposed as part of the TA request as detailed in this memo, and the Inspectors report and licence relating to licence Reg No P0039-02, a screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the Lower River Suir SAC and the Galtee Mountain SAC. The activity is 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 activity, 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.

This determination was based on the following reasons:

- The installation is not located within a European site.
- The movement of the location of the biofilter does not change the nature or quantity of effluent or storm water discharges from the installation from that assessed at the time of the last licence review (P0039-02).
- The movement of the location of the biofilter will not result in any change in noise emissions from the site from that assessed at the time of the last licence review (P0039-02).
- The movement of the location of the biofilter will not change the nature or quantity of the emissions to air from the biofilter. Monitoring data for 2015 demonstrates that ammonia, amines, mercaptans and hydrogen sulphide emissions from the biofilter remain below detectable levels and significantly below the ELVs in the licence (P0039-02). While the biofilter is moving 50m to the east (closer to the Lower River Suir SAC but away from the Galtee Mountains SAC), it is considered that this move will not result in an impact on the qualifying interests in either SAC, particularly in consideration of the aquatic nature of the qualifying species present in the Lower River Suir SAC, the nature of the qualifying habitats in both SACs, the distance between the installation and the sites and the dispersion available for such low levels of emissions. It is noted that there are no SPAs within the zone of influence of the site.
- The risk of accidents from this installation is extremely low but if they were to occur would most likely involve the failure of air abatement equipment leading to the release of non-compliant air emissions and potentially the generation of odours. The change proposed does not change the type of abatement already permitted under the current licence or the inputs or outputs of that abatement that would lead to an increase in the likelihood of accidents. It is considered that the conditions of the RD in relation to the monitoring and control of air abatement equipment and the control of odours are sufficient to ensure that accidental emissions from the activity will not impact on the qualifying interests of the European sites identified above, particularly in light of the nature of the potential accidental emissions, the nature of the qualifying interests, the distance between the installation and the European sites and the dispersion available.

- Given that there is no change in the nature or quantity of the emissions at the installation, it is considered that cumulative impacts with the adjacent Anglo Beef Processors Ireland t/a ABP Cahir site or with any of the other agricultural and industrial activities in the vicinity of the site will not occur on the European sites identified.

For the foregoing reasons it is concluded that there will be no significant effects on the qualifying interests of any European sites arising from air emissions, water emissions, noise emissions or accidental emissions from the activity.

6. Recommendation
This memo recommends that the requested changes be accommodated by a Technical Amendment of Licence P0039-02 (held by Anglo Beef Processors Ireland), in accordance with Section 96(1)(c) of the EPA Acts 1992 as amended.

I recommend that the licence amendment be approved as set out in the attached Recommended Technical Amendment. The making of the amendment will not result in the relevant requirements of Section 83(5) of the EPA Acts 1992 as amended ceasing to be satisfied.

Signed,

Pamela McDonnell
Inspector
Environmental Licensing Programme