

Objection to the Application for an Integrated Pollution Prevention and Control License by Reenard Farms Ltd. at Killurin Co. Wexford received by the EPA on the 1st of April 2005

27/05/05

I oppose the granting of an EPA IPPC licence following an application lodged on April 1st 2005 with the EPA, Reg. No. 742 for a review and extension of the license by Reenard Farms Ltd., due to the inclusion of an application to operate an Anaerobic Digester on a site abutting the River Slaney, a candidate SAC site.

My key concerns revolve around the unsuitability of the proposed site for this activity and the lack of assessment of the impact of the proposed activity on environment (air, water, humans etc).

EPA

The following are of my main reasons for opposing the granting of such a licence:

1 The Risk of pollution of the River Slaney, a candidate SAC

The lack of infrastructure of the proposed development and its proximity to the reed beds and the river is of grave concern.

2 The Risk to groundwater

It is proposed to construct the Digester and storage tanks from Mild Steel. This is of concern as the contents of the tanks could result in a major risk of pollution to the River Slaney and to the underlying groundwater and to the environment, due to the highly corrosive nature of the variety of acids emanating from the bellies.

The applicant has made no reference to the ground water quality limits for their proposed discharges, nor are there any groundwater management proposals presented.

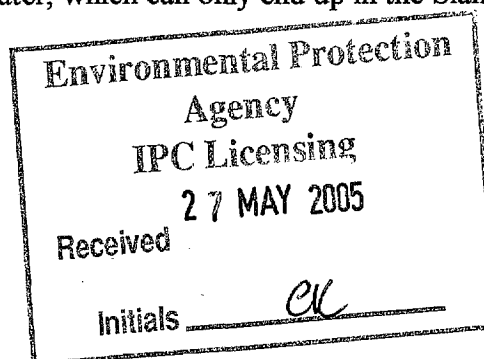
3 The Risk to surface water

Major omissions in the licence renewal application include: no recognition of either the EU Water framework Directive, or the Bathing Water Quality limits with respect to surface water discharges.

There are no surface water management proposals presented.

4 The Risk of flooding when surface run-off is impeded by high tides

This would result in run-off of polluted water, which can only end up in the Slaney.



5 The Risk to a heritage area

An ancient urn has already been found in the vicinity of the existing pig farm. The Deeps Castle is located nearby.

6 The Risk arising from odours in a valley

There was no plume dispersion modelling for the proposed facility. Given the historical issues with odour on the proposed site, a plume dispersion model is critical to determine the likely impact of the proposed facility. The applicant needs to demonstrate that the proposed activity will be within the EU Dutch norm for odour nuisances.

7 The Risk arising from noise pollution in a valley.

Proposed operating noise levels have not been presented.

8 The Risk of negative visual impact in a high amenity area

The proposed height, size and nature of this industrial development render it totally unsuitable for such a scenic and residential area

9 The Risk from transport of animal waste and digestate on damaged bridge and inadequate roads

There is no traffic impact assessment included.

10 The Risk to human safety from the importation of methane gases from Killurin Landfill Site in proximity to peoples homes and from Gas extraction

There are no details of how gas from the landfill is to be transported, i.e. tankers, pipe-network. By virtue of the fact that the application is proposing to import and store explosive gases on – site – does the facility come under the SERVESO II regulations?

Totally inadequate consideration is given to dealing with the contamination generated by a variety of gases other than H₂S. Is the method of abatement of H₂S gases adequate in dealing with the other gases generated e.g. mercaptans.

As the abatement is dependent on microbial activity, it is of concern that micro organisms are very susceptible to shock loading- even excess water can cause shock loading to the micros. Performance would be compromised in this event; what controls are in place to reduce the likelihood of shock loading.

There are no proposals to profile the incoming AD feedstock material to determine its suitability for the unit – thus increasing the risk of microbial decay due to unsuitable feedstocks.

There are no contingency arrangements proposed in the event of a breakdown in the AD unit due to such shock loadings.

11 The Risk of Fire.

This is of particular concern as the proposed facility will be storing and combusting highly explosive gases. The lack of emergency response and accident prevention measures indicates a complete lack of understanding by the applicant of the significance of the proposed AD unit. Whilst technology can facilitate the operation of any facility, unless the management is competent in these highly technical and potentially dangerous operations – then the site poses a serious environmental and human risk.

No risk assessments for the proposed facility have been presented.

12 The Risk of the spread of animal diseases from digestate.,

It is proposed to treat the animal waste at a temperature of 50 degrees Celsius. Unless the animal waste is pre-treated at 70 degrees Celsius, there is a high risk of animal diseases being present in the digestate.

13 The Risk of non-compliance with a host of EU directives.

The site abuts a candidate SAC, the Slaney river.

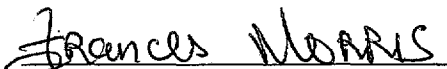
14 The Risk to a way of life for residents living in this area....

The simple pleasures which have been enjoyed in this area, walking, boating, fishing, etc. will be put at risk, in addition to the health and safety of the local residents.

I accept that as a community we all have a responsibility for waste management and treatment / recovery of waste. However I have no confidence in the accuracy and comprehensiveness of documentation submitted to date. I am concerned that the applicant has not demonstrated sufficient understanding of the proposed AD technology to instill the confidence that they will be capable of operating this facility without significantly impacting on the environment.

I request that the EPA postpone making a decision on this proposal until the applicant has answered to the EPA's satisfaction, the issues that raised in this submission and in the community submission already received by the EPA.. I also reserve the right to raise further issues pending any response from the applicant.

Yours sincerely



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