

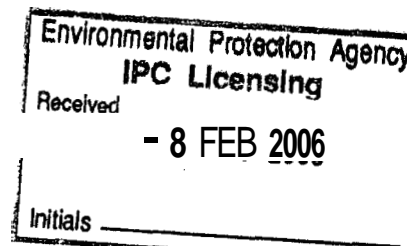
Tel: 053 28496

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Rivendell  
Reddina  
Killurin  
Co. Wexford  
Ireland

8<sup>th</sup> February 2006.

The Environmental Protection Agency.  
PO Box 3000  
Johnstown Castle Estate,  
Co. Wexford.



**Re: Application for review of licence granted to  
Messrs. Rennard Pig Farms Ltd., Deeps/Cornwall,  
Crossabeg, Co. Wexford, Reg. No 742. Currently  
Licensed under Reg. No 453.**

We the undersigned, having received and read your report on the licence review, wish to object to the granting of said licence. **Our** objection will be based under the following headings:-

- The location and suitability of the site.
- The scale and type of the project.
- The transport involved and quality of the roads.
- The methods and technology involved.
- The suitability of the proposed licensee to undertake such a project.
- The general nuisance which would be caused to local residents.

Signature

*[Handwritten signature: Mitchell]*  
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DEREK & MARGARET MITCHELL.

### **The location and suitability of the site.**

The site chosen for this large industrial development, is in a mixed area of farming and residential housing. Contrary to the statements to the contrary there are large numbers of residential homes, and the numbers are increasing, eight in the course of construction at present. (Within 1000m of the sites.) Farming land seldom is available for purchase, and this also indicates the popularity of the area.

The Wexford County Council deal with planning matters, however, the **E.P.A.** must have a major say where a development has the potential to destroy an area. Especially an area which has been designated a "selected area for conservation", as has the Slaney Valley. We suggest that the plans have been submitted, on this occasion, designed to conceal the true extent of the proposed development.

Mr. P.J. Hayes pointed out in his earlier submission that the geological structure of the site is made up of two separate layers. The unconsolidated upper layer and the underlying solid bedrock. The upper layer consists of glacial outwash deposits i.e. sand/gravel. The bedrock is made up of slates and grits and slopes down towards the river. This fact means that a discharge from the proposed installation will make its way eventually into the river. If it is a pollutant it will pollute the river.

The extent of this pollution will influence the extent of the destruction, not only to the river but also of the estuary where extensive mussel beds are farmed. This is a huge Euro industry whose future must be considered when granting this license. It must also be remembered that the River Slaney was once a great salmon river and could be again with proper control. Bad planning and mismanagement have caused the decline in the past, but now we have an opportunity to protect the future. Pollution is an insidious killer and has killed a large number of the smaller life forms in our rivers. To allow a processing plant of this magnitude would be official vandalism.

### **The scale and type of this proposed project.**

As mentioned above the scale of this industrial process will influence the extent of the pollution involved. The proposals would indicate a potential disaster. The damage which has already been done, might be reversed but further pollution on a massive scale would put the matter beyond any hope.

The present mix of farming and residential buildings is one which has developed over years, and the imposition of a large industrial development will destroy the balance.

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### **The transport involved and the quality of the roads.**

The importing of wastes as a supplementary feedstock for an Anaerobic Digester such as belly grass, cake sludge or fish waste as proposed is unnecessary. The stated reason is, that it will enable the generation of electricity for the National Grid. We have been advised that the amount of electricity produced is insignificant and is not sufficient to run the actual plant. We believe that importing these materials, would set a precedence, which would allow processing obnoxious waste products on an industrial or commercial scale, and thus justifying the proposed plant. This could be the hidden agenda which is the objective of the development.

It is proposed to transport slurry from both the Comwall Yard and the South Slobs Yard. The applicant had originally proposed to import 6,000 Tonnes and not cubic meters as stated in your Licence Review.

1 tome = 1000 Kilogrammes

6,000 tomes = 6,000,000 Kilograms

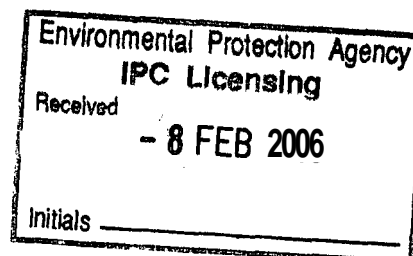
Equals 115,385 Kilo per week or 23,077 per day

This is a considerable quantity. It is essential that NRGE/ Renard Pig Farms advise us which measurement they intend using.

In addition to this huge tonnage there will be the lorries drawing into The Deeps Yard the additional loads of belly grass and fish waste. All this transport will have to use the existing inadequate roads in the area, and cross one of the two bridges on that road. From one direction they will have to cross the bridge over the R. Slaney, a bridge built c 1914 of iron and concrete, it now has deteriorated and is decidedly showing its age; indeed parts of the parapet are falling into the reeds and it certainly cannot take more traffic. From the other direction there is a single lane bridge known locally as Catt bridge which crosses a ravine and involving a series of bends and has been the location of several accidents in the recent past.

We now learn that the processed waste will be returned to the Slobs Yard. Is this in addition to the originally stated 6000 tomes to be Imported into the Deeps?

We have understood that all matter would be transported and stored in sealed containers. Now, we learn from your report that 'skips' will be used. This is totally unacceptable, because of the odours and leakage, on the roads and in the yards.



Large quantities of foul water are going to be generated in the washing. How will they dispose of this waste. Will it be transported away by tankers as it cannot be drained into the river.

### **The methods and Technology involved.**

The licensee proposes to build an anaerobic digester (AD), which will digest a mix of pig slurry and an supplementary feedstock, including belly grass and fish waste at the Deeps Yard. One of over ground tanks will be converted into a secondary digester, the others being storage tanks where preliminary digestion takes place. There seems to be considerable confusion to what temperature is required to kill off all weeds and parasites, seeds and disease. Your report states that the mix will be heated to 55C will achieve this effect, but other information would indicate that this is not so, and that where the mix is pressurised for one hour @ 70C can this be achieved.

A feature that the licensee wishes to introduce, which is an addition to the original proposal is that heated water will be piped from the Deeps Yard to the Cornwall Yard. This is probably impossible and uneconomical, because of the distance involved. The loss of heat over that distance would mean that the water would have shed most of its useful heat by the time it arrived, unless it started its journey very hot indeed. Any attempt to send water so hot as to be useful would have to start its journey as steam. This in turn would be hasardous.

Such pipes would have to be insulated so that the overall diameter would be c10" and very heavy. What route is proposed that such pipes should take is not explained. An obvious difficulty would be how it would cross the river. They could not cross by the bridge as they would be too heavy. It must be assumed that there would be two pipes, a flow and return. The weight of the pipes, the water and the insulation would be more than the ageing bridge could carry.

### **The suitability of the proposed licensee to undertake such a project.**

It is essential that the proposed project should be should be well managed. The experience that the people living close to the pig farm have had in the past has left a great deal of anxiety regarding any increase in the activities on the farm. A visit to the area of the licensee's Co. Tipperary operation inspires equal anxiety.

The person who runs or manages on a, day to day, basis must be suitably qualified to do so. Suitability can only be established as having a profession qualification or a number of years expience, ten years would

be considered suitable, of managing an industrial plant.

**The general nuisance which would be caused to the local residents.**

The existing levels of noise, smells of slurry, noise and the attraction of large numbers of gulls, rats etc., and swarms of insects must increase with the expansion of the operations. The swarms of pests have in the past and continue to cause a health hazard. The growth envisaged in this industry, or possibly other undisclosed developments in the future cannot be tolerated.

The local residents must look to your agency to protect the environment, and ensure that no development is allowed to destroy the undoubted beauty of the area or the welfare of the community.

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