

The Deeps,
Crossabeg,
Co. Wexford.
Tel: 053-28935

Environmental Protection Agency IPC Licensing - 9 FEB 2006 Received Initials _____

Re: Register No 453 Rennard Pig Farms Ltd Co Tipperary.
Licence No 742

To: EPA

Mr. Jonathan Derham,

As one of the closest residents and land owners to the proposed Anaerobic Digester at the Deeps, we have decided to make an appeal and objection to your intended decision.

We would like to see an improvement for the existing licence but do not want the proposed development bringing additional wastes from outside sources ie belly grass + fish waste.

We have already stated our objections to you in writing and met with you some weeks ago. We have also made objections to Wexford County Council.

We have to state that we have no confidence in your procedures of public participation, and feel that the EPA will make a favourable decision to the Development in any case. (We have no illusions, the parameters used in your decision making, a church before a dwelling house with a well, and the cut-off points and limitations of control where another agency overlaps with the proposed activity, Roads and SAC's.)

- (1) The application is for an industrial activity in the Slaney Valley - a scenic river valley, area of Natural beauty and important habitat for the whole of Co. Wexford: So designated An SAC by E.U. directive, Note: Not a candidate SAC. This designation is already in force; and it is simply NOT ACCEPTABLE for you, the Environmental Protection Agency of Ireland to say "Oh that's nothing to do with us - that's a matter for Duchas D.O.G. or the Local Authority"

We raised this matter with you in relation to the licencing of the adjacent Dump/Landfill, 2 years ago, and you chose to ignore the SAC question. In your draft decision you appear to intend on ignoring it again.

Your inspector, Ciaran Maxwell seems blissfully unaware of any contradiction here. I doubt if the people in Brussels would agree. There is more to protecting the Environment than just controlling pollution.

- (2) There is confusion and contradiction between the planning authority and the EPA. on a number of levels. You regard the Piggery and A.D. as an industrial activity, but the County Council regard it as an agricultural activity and are treating it accordingly. The result will be that the increased activity in importing waste to the plant and the additional traffic on what are already

very busy and poor minor roads will have serious impacts on the quality of life and safety of residents, on the environment in general and for users of the river.

The existing roads are extremely narrow, twisty and badly damaged by heavy trucks. Within the last two years accidents near the piggery resulted in cars ending up on their roofs. The old concrete bridge at Killuein is on its 'last legs'.

The importation by Trucks of large quantities of meat waste fish waste and offal will create foul smells, especially in Summer. We know of no way of handling such waste in a totally enclosed and odourless method.

There is already very significant noise from the piggery when the mill is in use - a loud whining and grinding that carries a long way especially in calm conditions.

Your report states the EPA have received no complaints of noise. Most people would not be aware that the EPA has anything to do with the Piggery.

3. Water pollution to ground water and wells is a concern. The Report appears to have the on-site water pollution control dealt with but our concerns are via the landspreading of digestate

Firstly the slurry under the current licence is spread on land, it is untreated at present and has a link with the diminishing quality of our drinking water. There is very little account taken of the present problem in the report. The present licence ~~can~~ could do with the elaborate A.D. system. Do we need a large scale commercial private waste disposal site, depending on waste from Fish and meat plants (and God knows what else in time) to have a cleaner product to spread on the land. Can you not see the point in improving the present system before you add to the problem.

The present system linked with the Department of Agriculture Nutrient Management Plan for recipient farmers has no means of redress where a problem occurs. We have made our case by letter to the EPA, pointing out that handspreading of untreated slurry is a hazard to our well, we have had no real answers.

after visiting you some weeks ago we were advised to contact the EPA's legal control office. We feel very "put upon" by this suggestion. Should in the proposed development situation the same problems face us, will you still give the same reply (see it out for yourself).

The ground water quality liaison between all the Monitoring, reports, policy and good intentions from the EPA, local authorities and relevant Departments is not filtering down to the tap in the kitchen.

The clearance of the end product, digester slurry for land spreading, now and in the proposal, is left to Best Practice decisions of storage and spreading by the recipient farmer who may or may not have the resources to deal with its disposal in the best possible way.

The end product of AD ~~has~~ to be spread on the land, is all responsibility loaded onto individuals who work according to available means in an understanding of general acceptance. Not all farmers are in REPS. This back door 'get rid of it' now that we are finished our scientific use of it, puts a bit of responsibility on the farmer and is a concern for ground water quality control not followed through by the EPA. The EPA are not realistic.

In conclusion if the EPA wish to support the idea of A.D.'s in Ireland as a means of dealing with Pig slurry, why not lobby the government to give tax incentives for the building of same, for the purpose of dealing with locally produced waste, and so avoid the commercial interests which seek to import waste into a driven area.

The Inspector's Report reads as an appreciation of the wonderful benefits of A.D. It does not adequately address the serious concerns listed above and made

by people like ourselves who took the time and trouble
to decipher your very technical documents and
write to you -

Yours sincerely

Phil Pearson .

Peter Pearson
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