

Reddina  
Killurin  
Enniscorthy  
Co. Wexford



Date: 6<sup>th</sup>. February, 2006.

Office of Licensing and Guidance,  
Environmental Protection Agency Headquarters,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Wexford.

**Objection in accordance with Section 87(6) of the Environmental Protection Agency Acts  
1992 and 2003**

**In respect of Proposed Determination of Review of Licence (Register Reference Number  
762) Reenard Pig Farms Limited**  
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Dear Sirs,

I wish to object to the issue of the above licence on the following grounds.

I find the report submitted to the Board of Directors on the 15.12.05 to be lacking in details and not to give adequate protection to the environment, which in particular is the area that the EPA is charged with protecting.

#### **Process Description**

As part of the process description, one would expect to have seen a detailed description of all the storage facilities in respect of raw material taken on to the site. If raw material is being stored on the site, it should be stored in sealed containers and these containers should be properly banded in order that an environmental disaster be avoided in the event of leakage or damage to the containers.

#### **Objections & Complaints**

No action would appear to have been taken by the Inspector in respect of the complaints already lodged against the existing licence, other than that they are noted.

#### **Odour**

The agency acknowledges that the risk of odour will be reduced as a result of anaerobic digestion. No testing or measuring has been carried out to date with regard to the odour, therefore, it is impossible for the agency to suggest that things are going to improve.

The odour emission rate should be specified and agreed prior to this licence being given consideration.

No programme of continuous monitoring of the existing problem is proposed under the renewal of the licence.

It is clear from living in the area that the problem has not improved with the removal of the lagoons that were used to store slurry, because very time slurry is moved on this site, an odour spreads right across the valley and can be picked up by the households in the area.

The material being transported to the site, such as fish and other products, some of which is being transported in open lorries, will give off odour not just when being stored prior to entering the process system, but also while being transported on the roadways to the site.

It would be reasonable to assume that the Inspector would have at least insisted that all products be carried in sealed containers.

I would like to know how the Inspector arrived at the conclusion that the odour contribution from the activity on this site is going to be reduced by 80%, or is this a figure given by the proposers.

### **Ground Water Monitoring**

The developers are required to install new ground water monitoring points down gradient of the bio gas plant within 12 months of the granting of the licence. This appears to be ridiculous as all of this testing should be done now to assess the exact situation on the site.

### **Land Spreading and Recovery**

In view of the new nitrates policy, it would be impossible for the applicants to have all the digestate spread on the land currently available because the information coming from farmers in the area would suggest that most of them will not be able to take any more slurry or digestate as of January 15<sup>th</sup> 2006, therefore, considerable additional land would be required and it would be reasonable to assume that testing should have been carried out on all lands and submitted to the **EPA** in order to arrive at the conclusion that adequate facilities will be available for the disposal of digestate. The whole question of the disposal of digestate should be addressed in much greater detail and should be tackled immediately, before this plant is built.

### **Noise**

It is wrong to say that no complaints have been received by the **EPA** in respect of noise. What has actually happened is that the **EPA** has ignored the householders who have complained and an urgent report should be commissioned and the evidence published. There is no point in saying you are going to monitor noise six months after the granting of the licence, the plant will be built at this stage and if there is a problem it will be too late.

## Fit and Proper Person Assessment

No evidence has been produced by the applicants that proper trained personnel with experience in this business are going to be on site - all that is going to happen is training will be given by the installers of the plant - this would appear to be less than satisfactory given both the scale and nature of the operation.

Other businesses, such as Wexford County Council and the Department of Agriculture, are mentioned in the Inspector's report.

I would object on the grounds that no discussions have taken place between the EPA and these bodies, and no agreement has been reached with regard to product, in particular the belly gases which could contain parts of animals and fish waste.

The Inspector has agreed with a number of proposals put forward by the applicants, one with regard to washing facilities. Why did she recommend

- washing facilities without having planning permission and proper treatment of the by-product from the wash, and
- the transfer of steamed hot water from one plant to another across the river Slaney

If the steam and hot water is to be piped across the river, planning permission is required and it should be noted that the applicant does not own the land on either side of the river. The bridge over the river has an opening which was used many years ago to allow boats pass up and down the river, therefore, I feel this should not have been encouraged by the Inspector, and she did not give due consideration to the requirements.

Overall, in allowing this development to take place in such a sensitive area, the EPA is not taking its remit seriously in protecting the environment. No consideration has been given to the various letters sent by Wexford County Council to the applicants seeking detailed information with regard to the drawings and a lot of queries on the drawings related to its impact on the environment.

I request the agency to acknowledge receipt of this objection and hope that some of the above points will be taken into consideration when the overall decision is made, and above all I hope that the environmental issues I have raised are addressed.

Yours faithfully,

Michael A. O'Leary