Obj. No. 4

Office of Licensing & Guidelines,
EPA Headquarters,
P.O.Box 3000
Johnstown Castle, Co. Wexford

Objection in respect of the Proposed Determination for a Review Integrated Pollution Prevention and Control License by Renard Farms Ltd. at Killurin Co. Wexford (Licence Register No. 742)

04/02/06

To Whom It Concerns

We wish to object to the above proposed determination. The reasons for our objections are numerous, and as follows:

(1) It was an error to build a piggery beside a river in 1962. The pollution that has occurred from both the dump and the piggery is well known to us. The rocks both north or south of the bridge at Killurin are bare. Swans no longer nest here, and a fish catch is a rare event. It is illogical to allow an increase in pig numbers on this sensitive site.

(2) Once it had been decided by the Inspector to favour the NRGE/Ronan submission, it followed that she had to rebut our submissions and reassure the local population. In short, this favours commercial interests over local environmental concerns. This ethos is set from the top down.
On reading the Inspector's report, it is obvious that she accepts the word of NRGE without serious investigation; she accepts the licensee's assertion that all weed seeds and 98% of all pathogens will be killed at 55 C. No scientific evidence has been provided to back this claim. It may be true, but surely more then a statement by the licensee is needed.

(3) There are no serious questions concerning the organic materials to be imported.

- Fish Waste is **not** currently land-spread n Wexford;
- It cannot be brought to Killurin Landfill
- There are not even EPA guidelines for its disposal; most of it is dumped at sea, to prevent odours and lower transport costs.

Rather then charging for its disposal, NRGE may have to pay for fish. Fish has a value as a

protein source, a fertilizer and as a source of Omega 3 oil. .
Is it possible that fish-waste was selected by NRGE to avoid DAF regulations?
Belly grass is most obnoxious. It is not land-spread. Indeed, Larry Earle in Camolin is prohibited from removing it. Is it permissible for digestate from this Class 2 Material to be spread on grassland?

(4)In the Inspector's comments on page 12 of the report, it is claimed that shock-loading will be prevented by mixing pig-slurry with imported waste at a ratio of 9:1; yet in section 2.6, the figures quoted are 33,350cubic metres of slurry, and 6,000 tons of organic wasted. These figures will not give a ratio of 9:1. Will extra pig-slurry have to be imported from other sources to achieve this ratio?
While we have limited expertise in microbiology, we are of the understanding that shock loading is prevented by controlling the carbon to nitrogen ratio, pH, and temperature. This is best achieved by a consistent stream of materials.

(5)In section 1.6, there is a statement that DAF approval is not **presently** required for the licensee's proposal; yet later on page 12, there is a very definite statement that *no animal by-products, other then fish waste, shall be treated at this installation*. Given the statement in section 1.6, is there a possibility that animal waste may be accepted in the future?

(6)The energy audit may sound plausible ;...AD energy will drive the mill, heat the piggery, etc., but in section 1.4 of the report, there is a reference to heat being *transferred from the Deeps to the Cornwall Yard across the River Slaney on the Deeps bridge, via hot-water pipes*.
The idea of sending hot water across a public damaged bridge, under which our local children row and from which people fish, sounds dangerous and ludicrous. This was not mentioned in the original application nor in their planning application to Wexford Co. Council nor in their EIS; yet it is simply accepted by the Inspector.

(7)The suppliers of the Biogas plant, i.e. sales people from Denmark, are to train the staff after the plant is built. Is this the norm for training people in AD technology? Should a *'Fit Person'* not be one with adequate experience to operate the AD.

(8)Apart from the risk to the river and the SAC, odour is the most emotive issue, especially in the hot-spots where people cannot hang out their clothes, or even go for a walk, in this, the Slaney Valley, on particular days when the pressure is low and there is little wind. In these circumstances, odours may hang about for days. To quantify this in terms of the number of complaints received is to totally miss the point. County Hall and the EPA simply

note the complaint; there are no penalties imposed. It is ironic that the first complaint in 1983 to the Co. Council in relation to the adjacent landfill site was in relation to fish odours. Fish waste is no longer accepted for land-fill at Killurin.
The Inspector takes the position that NRGE will achieve an 80% reduction in odours when the tanks are covered , slurry is transported properly and Digestate replaces raw slurry on soil. This assumption may be correct; however our concerns are for the **site in Killurin**. In this, we envisage even greater risks from odours with resultant damage to health and lifestyle.

- There are no provisions to cover the vehicles transporting fish and belly grass, both of which are infamous for odours; there is a reference to organic material ***skips*** on page 12 of the licence.
- The mixing area should be enclosed and operate under reduced pressure, as in DAF regulations.
- The gases, sulphides and mercaptans may escape from the digester tanks.

Oxidation prior to burning seems to be in order to protect the engine. In the abbreviation section of the licence, mass spectrometry / chromatography is mentioned, but is not to be used in monitoring.

The concept of monitoring one year, or even one day after construction is simply absurd. There are standard procedures to quantify risk prior to building a digester. On this sensitive site should such procedures not be implemented?

The storage of Digestate solids is to be in a hay-shed . It will contain fish residue and when damp, it may prove to be another potent source of odours. Will these odours be contained by a wind-break?

(9) The inspector does not appreciate the risk to groundwater on this site. All over Crossabeg soils are a mixture of sand, shale and marl. Finding suitable sites for septic tanks gets more difficult by the year, as more stringent planning regulations are imposed; yet it is intended to build huge digester tanks underground.; the area is not paved or cemented; the old septic tank and percolation area are acceptable; a hayshed full of phosphorus-rich solids is approved! Can all this be implemented without any risk to groundwater?
A hydrogeological survey carried out on the adjoining site, i.e. the dump, in 1982 indicates the risk: high tides enter the base of this sand and gravel pit.

The proposition by the applicant to dig a hole between the site and the river and then compare it with the existing well was accepted by the inspector. A full year after construction was allowed before comparisons would be made.
Should a proper hydrogeological survey not be carried out on such a sensitive site *prior* to

construction?

(10) The Inspector also accepts that the land-bank which is currently used for slurry will all be available for digestate which may contain fish residues. Fish, it must be remembered, is banned from many animal feeds. Should not the availability of this land be checked out with farmers and the Veterinary section of The Dept. of Agriculture? There are concerns among farmers about the liquid Digestate. A community A.D., where the farmers control the inputs and spread the Digestate on their own land would be much more acceptable, and far safer.

(11) In general, with both slurry and Digestate application, there should be little risk to either the ground water or the river. It is simply a matter of good agricultural practice. Incidentally, is there not a significant risk of spreading disease by placing an A.D, which imports so much slurry & organic material, so close to a piggery? Would it not be better to place the A.D in a central location with slurry and waste being transported away from the piggery to this central location?

Our main concerns with regards to groundwater are for the site in Killurin, the river and the SAC. This area is sometimes flooded. This can happen when high Spring tides block pipes, and surface water flow is blocked, as happened in Wexford town last year with devastating results.

Is the EPA not aware of the flow of surface waters to the river? Note the size and depth of the trench to protect the landfill site across the road from surface water. The provision of adsorbent material in a situation where the staff are not present seven days a week is not reassuring. Bunding constructed with on-site material, i.e. sand, shale and marley clay is not good. We have seen and reported surface water breaking clay barriers in the landfill site and flowing out the gate to the river.

If the risk from surface water is ignored, or conveniently minimised on **this** site then the EPA need not have any concerns for any other site. There are many people who now believe that the Board of the EPA did not study the merits of placing an AD on this site because they are so much in favour of A.D technology for national reasons

.(12) The EIS is a deficient document. It does not properly address the issue of the impact of the proposed development on this site in Killurin, on the river and on the adjacent SAC. It appears to be a collection of data, e.g. lists of farms where slurry is spread, EPA data on water quality, etc. It contains some peculiar statements, e.g. '*this is a remote location*'. In truth, it is an area with a fast-growing population; Crossabeg National school has gone from a four-teacher to a seven -teacher school over the past number of years, and is projected to have nine teachers in the near future.

The idea of pumping odours from the piggery up into the air would work only if pressure

We are convinced that this site is not the appropriate one for AD technology. As farmers ourselves we appreciate the difficulties in disposing of animal waste in an environmentally friendly way, and that AD may be the way forward. However, site selection must be carefully considered, and we know Killurin is the wrong site.

Yours sincerely,

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