

Crossabeg / Killurin Community Action Group Oaklawn, Kyle, Crossabeg, Wexford

Tel: 087.2303045 info@riverslaney.org

Environmental Protection Agency ney.org IPC Licensing Received

02.02.2006

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

7 FEB 2006 Initials

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-Reenard Pig Farms Limited

Dear Sir/Madam,

Please find detailed hereunder an objection made on behalf of Crossabeg/Killurin Community Action Group (address specified above) in respect of the proposed determination of the Review of Licence (Register Reference Number 762) as issued by the Environmental Protection Agency to Reenard Pig Farms Limited and notified to the Action Group on 13th January 2006.

We attached the specified fee of €126 as required.

Objection #1 Inadequate Provisions in Proposed Determination for Storage of Wastes and hence Protection of Surface Water and Groundwater.

No details have been provided, or requirements specified in respect of the storage of specific imported wastes on-site, e.g. energy crops, paunch, fish waste etc. There should be a prohibition on storage of such materials on-site with the exception of within air tight storage tanks vented to an odour control unit.

Objection #2 Inadequate Provisions in Proposed Determination for Prevention of Vector

The proposed determination does not include adequate control to protect the environment and neighbouring residences from vector nuisances, despite an acknowledgement by the Inspector in her report of the EPA having received a complaint in this regard in 2005.

Objection #3 Inadequate Provisions in Proposed Determination for Preventing Significant Odour Impact

Whilst condition 5.4(i) specifies that the operation should be conducted in a manner which ensures that 'air emissions and/or odours do not result in significant impairment of, or significant interference with the amenities or the environment beyond the site boundary and at odour sensitive locations' the Agency have indirectly acknowledged that such a risk exists through the requirement in 5.4. (ii) and (iii) to implement specific odour control measures.

It is contended that the requirement to vent the mixing tank to a bio filter provides no assurances that odour from this source will not impact on the environment beyond the site boundary, particularly during loading and unloading activities. There is precedence in the IPPC licensing regime for point source emission limit values to be set at source locations. To this extent, it is urged that a validated odour model for developed for the site which assesses the impact from all odour sources and demonstrates the capability of the proposed odour management programme to prevent interference with the environment beyond the site boundary. The odour control unit required to be installed by the applicant should be conditioned to specify an odour emission rate limit (and appropriate chemical determinant equivalents), a boundary limit (1.5 OU_F/m³ as 98%ile as the source of the emission is a new installation) and a limit at the nearest occupied dwelling. A periodic monitoring requirement should also be set out in the licence to confirm compliance with the boundary limit and continuous monitoring should be specified for the outlet of the odour control unit (e.g. H₂S, Ammonia, Standby alternatives for the odour control unit in the event of malfunction, breakdown or inadequate performance should also be specified.

MAIN FILE EVALUATION FILE FOR VPA

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The transport of solid and semi solid material should also be transported to the site in a sealed container.

Much as is the current precedent for waste transfer stations, we would consider it to be very appropriate that the preliminary transfer of waste material, from the transportation containment to the initial receiving tank, that such a risky activity should be conducted within a designated reception building, and not exposed to atmospheric influences. In addition this building should also be supplied with an odour control unit.

We were very surprised to note in the inspectors report an assertion that the odour contribution from the activity would be reduced by 80%, considering that the most significant sources of odour likely to be generated on the site will be from activities prior to any of the proposed treatment processes.

In this regard the conveyance of material at the front end of the process will be no different from an odour generation prospective than any other coarse slurry handling systems.

Objection #4 Conflicting Limits on Pig Slurry to Supplementary Feedstock Ratio

The applicant had originally proposed that 'pig slurry will be mixed with the supplementary feedstock to achieve pig slurry to imported waste ratio of 9:1'. The total slurry production was estimated at 33,350m³ yet the Agency has specified a limit to imported supplementary feedstock of 6,000 m³. To maintain the ratio of 9:1 the supplementary feedstock limit has to be capped at 3,706 m³.

Objection #5 Groundwater Monitoring Wells

It is contended that the reserve and main supply groundwater wells are inappropriate to utilize for groundwater monitoring vis a vis environmental protection. These wells are likely to be deep bore wells to ensure consistency of supply and as such they would be ineffective in assessing contamination in the immediate subsurface. This is considered to be particularly appropriate due to the proximity of the River Slaney an SAC and the likely proximal links with shallow groundwater at the locality of the applicants proposed development.

Objection #6 Noise Limits

The noise limits specified in Section B.4 at night are 45 dB(A) L_{Aeq} (30 minutes). It is strongly argued that a more appropriate night time noise limit in this rural location would be 35 dB (A) L_{Aeq} (15 minutes) with no tonal or impulsive component.

Objection #7 Environmental Liabilities

It is strongly contended that the requirement in Condition 12.2 to demonstrate the financial provisions in place in relation to the underwriting or costs for remedial action is wholly inadequate. Anything less than a fully independent and insured bond is in unacceptable risk.

Objection #8 Fit and Proper Person Assessment

In the EPA's website it is specified that a 'fit and proper person' is;

"...any person employed by the applicant to direct or control the activity has the requisite knowledge and qualifications to carry on the activity in accordance with the conditions of the licence".

In the Inspector's report it states that "It is proposed that the suppliers of the biogas plant equipment will provide full training to staff...." It is argued that the operator and staff should be in a position to demonstrate to the EPA through certification or otherwise that they have the capabilities and knowledge to operate the plant safely both from an environmental and health & safety point of view. In the case of the recent licences granted to Indaver for the operation of the waste facilities in Duleek



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and Ringaskiddy, the licence requires that the manager of the installation have at least 10 years experience of operating such a facility.

Objection #9 Fish Waste Digestate

The Inspector's report acknowledges that there is little or no precedent for the spreading of digestate containing fish wastes; hence the possible risks are unknown. To this extent the conditions as set out in the proposed determination cannot provide assurances that the proposed development will not pollute the environment.

We would strongly recommend that clarification is obtained from the Dept. of Agriculture regarding the compatibility of the proposed process with their animal by-products processing guidelines Ref. version 2-30/08/2005

Specifically concerns over the following;

- Operating temperature of the digester process
- The land spreading of the digestate.
- Hygiene requirements

We request that the Agency acknowledge the receipt of this objection as soon as possible and for the protection of the local environment and local residents' health and safety address our objections comprehensively when considering the proposed determination.

Sincerely,

Dr. John Morris

Michael o I

Peadar O Connor

Gerry Nash