

**Patrick J. Hayes**

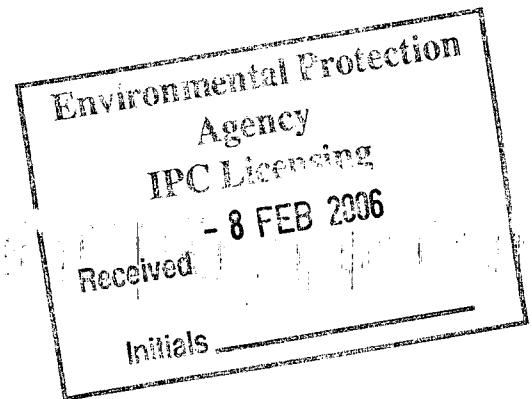
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Obj. No. 6  
Rathcline,  
The Reisk,  
Killurin, Enniscorthy,  
Co Wexford.  
Phone 053 28956

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

31<sup>st</sup> January 06

Your Ref: Reg No 742, Current Licence No 453  
Reenard Pig Farms Ltd  
The Deeps, Kilpatrick.  
Killurin.  
Co Wexford



Dear Sir /Madam,

Following the receipt of your report on the licence review as prepared by Clara Maxwell. I wish to object 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 742) Rennard Pig Farms Ltd. Currently licensed under Registration Number 453 on the following grounds.

1. The proposed development is way in excess of the capacity necessary for a farm of this size. It is obvious that there is an alternative agenda. This can be shown by some of the proposals that they have put forward to justify the size of the proposed instillation. These can be shown to be impractical from both economic and engineering points of view. I would suggest that this alternative agenda is to expand their business into the processing of certain obnoxious waste products on a commercial scale .
2. The importing of wastes as supplementary feedstock for the A.D. such as a) belly grass, b) cake sludge, and c) fish waste is totally unnecessary. The excuse given is that they want to generate electricity to supply the National Grid. I have been advised by engineering consultants who have dealt with larger similar type plants that the amount of electricity produced is insignificant and is in most cases not sufficient to run the actual plant. I am referring to the new Clonmel sewerage treatment plant and the new sewerage treatment plant in Cork. The real reason to import these materials is to set precedence so that they can engage in the business of processing obnoxious waste products on an industrial or commercial

scale and thus have to justify the size and scale of the proposed plant. It should be stated that they would have sufficient biogas without supplementing the mix to generate electricity to supplement their own needs. The applicant had originally proposed to import 6,000 Tonnes not cu meters as stated in your Licence Review. 1 Tonne = 1000 Kilograms  
6000 tonnes = 6,000,000 Kilograms

Which = 115,385 Kilo per week

Which = 23,077 Kilo per day. A not inconsiderable amount. It is essential that NRGE / Rennard Farms advise us which measurement they intend using, Cubic Meters or Metric Tonnes. I would also point out that to mix the slurry with imported waste at a Ratio of 9: 1 must be capped at 3706 cu Meters not at 6,000 cu meters. Please check your calculation.

3. Your report states that the mix will be transferred from the mixing tank to the digester where it will be heated to 55C Our information shows that the slurry should go from the Reception to Pre-treatment where it is pasteurised for 1 hr @ 70C and only then into the digester. This is essential to kill off all parasites, disease, seeds etc. Bypassing this treatment is unacceptable. It would appear that the licensee states that the proposed thermophilic digestion at 55C will kill off all weed seeds and 98% of all pathogens and parasites, again this is not acceptable. It must be remembered, and taking into consideration, that this area of County Wexford engages in Dairy farming, Cattle rearing and Horse breeding on a large scale. Unless a farmer can have full confidence in the resulting slurry there is no way that he will take the risk and allow this slurry to be spread on his land. They have also expressed grave concern at the proposal to source feedstock from Abattoirs, Dairy processing and Fish processing plants, as there is no accounting what material may be introduced into the A.D. This is how outbreaks of disease can be introduced which could be spread throughout the area.
4. It is proposed to transport slurry from both the Cornwall Yard and the South Slob yard to the A.D at the Deeps for processing and the transport it back to these yards for storage and then once again transport it to the various farms for spreading. This is economic nonsense where the slurry spends most of it's time being driven around the country at great cost both in time and money, and adding to the number of journeys both up and down what are unsuitable country roads and also adding to traffic congestion. An alternative A.D at the South Slob would be the correct answer. But then they would not be able to justify their increased capacity requirement for this instillation.
5. The reception or mixing tank must be housed in a dedicated building which is maintained under negative pressure to prevent external release of odour, dust, aerosol or ammonia. The ventilated air must be treated to

remove odorous compounds and to reduce potential pathogen transfer, Odorous air can be collected and used as excess combustion air for boilers or engines. This results in total removal of odours compounds. Where necessary the air may have to be filtered through scrubbers. See your publication . Environmental Research. R & D report Series 16. "Feasibility Study For Centralised Anaerobic Digestion for Treatment of Various Wastes and Wastewaters in Sensitive Catchment Areas." This publication should be studied in great depth and will highlight the many points that we are making and the flaws in the proposed development. It is essential that not only should the reception area within the designated building be kept spotless but the designated building must contain facilities where the delivery trucks or tankers can be washed down and sterilised after each and every delivery to stop the spread of disease. All imported materials must be stored in proper stainless steel, sealed tanks, vented into the above system where the odours can be removed.

6. The proposal to heat the Cornwall yard by laying on a hot water pipe to convey hot water from the Deeps yard is utter engineering and economic nonsense. The distance between the Deeps yard and the Cornwall yard is approx 1 kilometre. To convey hot water that distance would require a steel pipe of about 100mm diameter plus insulation, making a total diameter of 250mm. Both a flow and a return pipe would required to be laid i.e. a total of 2 Kilometres of pipe. At best the heated water would be classified as substandard i.e. the water would have lost a lot of it's heat over that distance unless they intend using a pressure system which they have not specified. This would constitute a great danger both to the public and the environment should a pipe burst or a leak occur. It is very doubtful if the council would allow the laying of these pipes or this system. To excavate and lay these pipes for a distance of 1 kilometre along the roadway, backfilling with selected material so as to protect the pipes and insulation and reinstating the road can only be carried out at considerable expense.

Crossing the river would be another story. The Deeps Bridge which crosses the River Slaney at this point is an old concrete structure built in 1914 with an opening section to allow river traffic to pass up and down the river. This may not work at present but it is still there and possibly in the future with the increased usage of the river for leisure activities, may be restored. It would not be possible to lay pipes of this size on this bridge. Nor would it be possible to affix these pipes to the parapet of the bridge due to it's condition and also the combined weight of the steel pipes, insulation and the large volume of water contained in the pipes. On account of the increased use of the river for recreational activities any scheme for bringing the pipes across the river must be such as not to hinder or interfere with river traffic. It must also be taking into account the large volume of water to be heated to accommodate this

scheme. The cost of pumping water through these pipes for a total distance of 2 Kilometres along with both the capital and running costs that this plant would entail would be excessive. One can readily see that this scheme would not be economically feasible.

It is of interest to note that this scheme was not included in any of the Planning Applications that were made by the applicant to Wexford County Council. Once again this is a ploy to justify the vast size of this complex. The full size of the instillation may not be appreciated due to the way that the plans were presented. When one considers that no information was given to indicate what scale the plans were drawn to. No proper elevation was provided to indicate the impact on the landscape. The plans were also drawn so as not to indicate the true height or diameter of the storage tanks. They are in fact 18.100 meters high by 12.500 meters diameter. It was only after complaints by the public that these dimensions were provided. It is also of interest to note that the Planners have requested further information on a number of matters, but what is significant is that all the storage tanks on site were not accounted for or shown on the plans. This sort of omission understates the true storage capacity of the proposed plant, hiding such information is not acceptable. Whilst we fully appreciate that the County Council deal with planning matters the E.P.A. must have a say where a development has the potential to destroy an area especially an area that has been designated a SAC area as is the Slaney valley and must take action. It is very obvious that the plans that have been submitted for this application were designed to conceal the full extent of the proposed development and it's true nature.

7. As was pointed out in my previous submission 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, which slope down towards the river. This fact means that any discharge from the proposed instillation will make it's way eventually into the river. If it is a pollutant it will pollute the river. Depending on the extent of the pollution could mean the destruction not only of the river but also of the estuary where extensive mussel beds are farmed. This is a huge multi million Euro Industry whose future and the potential risk involved must be taking into account when considering the review of this licence.

It must be remembered that the Slaney was once one of Ireland's great salmon rivers, it no longer is. Whilst netting plays a great part in the destruction of the salmon it is not the only culprit. The mismanagement of our rivers has also played a large part. Bad planning decisions, destruction of the spawning beds, unsuitable and badly designed weirs, salmon ladders that the fish cannot find or badly designed have all played their



part. One of, if not the biggest problems is pollution. Pollution is an insidious killer and has killed off a lot of the smaller life forms in our rivers. These life forms pay a large part in the food chain and are essential to the health and well being of the other life forms such as Trout, Salmon etc. To allow a processing plant of this size and nature on this river would be official vandalism. We can no longer plead ignorance of these matters; the facts are there for all to see and must be taken into account.

8. Due to the high risk factor of this proposal. To contain any spillage or leak of effluent on this site will involve extensive civil engineering works. These works will involve the construction of reinforced concrete bunds with reinforced concrete bases to all tanks and storage areas. Designed to contain any major spillage that might occur. The paved areas and roadways must also be of similar construction with proper washing down and drainage facilities and not as envisaged by NRGE/Rennard Pig Farms Ltd who proposed a cheap substandard gravel paved roads and work area. This type of construction may be suitable in domestic or parkland situations but is not suitable in this situation as it will lead to pollution. The costs will be extensive but that is the price that one must pay to develop an unsuitable site. The reality is that this site is not suitable for a project of this nature. It is not a case that this is the only site available, there are more suitable sites to be found in the county.

9. In the interest of the environment and good planning anywhere in the country, the following criteria must be adhered to for this type of development

- 1 Must fit in with the landscape and not create an eye sore
- 2 Must be away from all human habitation so as not to cause injury to health or constitute a nuisance.
- 3 Must have good road access
4. Away from rivers or other water courses where a spillage could cause pollution.
- 5 Must be designed and constructed to comply with best practise and technology available at this moment in time.
- 6 Not be situated in a valley or other low lying area where the odours will linger in certain weather conditions. In the Slaney Valley these odours can linger for several days.

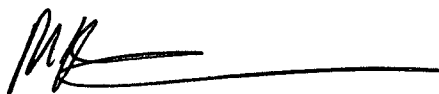
It is very obvious that the proposed site does not meet with any of these Requirements. It is up to the E.P.A. to see to it that this type of development is not allowed on this site or any similar site in the area. It has to be realised and taken into account that the odours which permeate from the type of instillation that Rennard Farms propose and the type of business that they wish to engage in, are not just bad smells. They are in fact a form of gas. As such they are injurious to public health. As was

already pointed out and acknowledged by the EPA these gasses do linger in the Slaney Valley. It should be realised that this period can extend over several days or longer depending on weather conditions. The E.P.A must take into account the recent tragic death of a young boy in County Cavan who was overcome by Hydrogen Sulphide gas. This took place as they were loading a trailer with mushroom compost in the open air. This gas is a product of Anaerobic Digestion and must be taking into account for the safety of those living in the valley. Despite what Rennard Farms and NRGE may have stated in their various applications this area is not and I quote "a remote area" it is in fact a populated thriving community who are relying on both the Planners and the EPA to protect them.

- 10 It is essential that to comply with their Environmental Liabilities that the Applicant apply for and get an independent Insurance bond to cover all their responsibilities and risks. The operator and staff must be in a position to provide Certification that they have the capabilities and knowledge to operate the plant safely from both an environmental and health and safety point of view. In the case of the recent Licence granted to Indaver for the operation of the waste facilities in Duleek and Ringaskiddy. The Licence required the manager of the instillation to have at least 10 years experience of operation such a facility.
- 11 It is essential that clarification be obtained from the Department of Agriculture regarding the mixing and spreading of fish wastes, as the possible risks are unknown. Assurances and proof must be provided that the proposed development will not pollute the environment.

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

Yours sincerely,



Patrick Hayes