



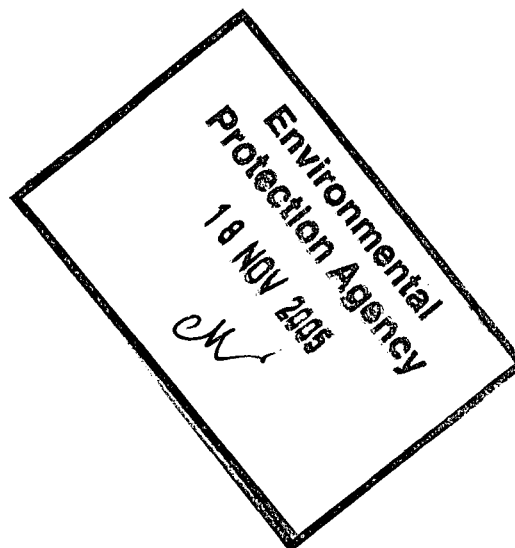
Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Lacken,
Dublin Road,
Kilkenny,
Ireland.

Telephone 353 56 7784100
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16th November 2005

Ms. Catherine O'Keefe
Office of Licensing & Guidance
Environmental Protection Agency
Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford



RE: IPC Licence 742

Dear Ms O'Keeffe,

Please find attached report from Kay O'Connor, Environmental Health Officer with comments regarding IPC licence application above.

Yours sincerely,

Dr. Beth Ann Roch
Consultant in Public Health Medicine

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EPA

MAIN FILE ✓

PUBLIC FILE ✓ x 2

EVALUATION FILE ✓ CH

DATE 18/11/05 (CK)



Environmental Health Service,
Wexford Community Services,
Whitemill Industrial Estate,
Wexford.

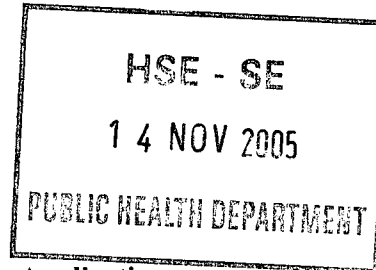
Feidhmeannacht na Seirbhíse Sláinte

Health Service Executive

Dr Beth Ann Roche,
Public Health Physician,
Health Service Executive,
Southern Area,
Lacken,
Dublin Road,
Kilkenny

Telephone 353 53 23522

Fax 353 53 42068



Re: Integrated Pollution Control Licence Application
Reg No: 742

Dear Dr Roche,

The enclosed Environmental Impact Statement and your recent correspondence refers. Environmental functions are no longer performed by the Health Service Executive in Co. Wexford. Environmental issues are the responsibility of the Sanitary Authority in this area and complaints received in relation to developments such as the above (concerning matters such as Public Health Nuisance, Air Pollution, Water Pollution etc) would be referred to the authorized body. We, the Environmental Health Service have no record of any complaints in relation to the existing Piggery in The Deeps, Killurin.

In relation to complaints received by both of the bodies responsible for monitoring and control of the existing facility (i.e. EPA and Wexford Co. Council) the following was noted;

- o There have been a total of 5 complaints logged by the EPA since the initial licensing of the Piggery in 1999. They involved the following issues;
 - ◆ Odours
 - ◆ Flies
 - ◆ Water quality at Killurin Bridge
 - ◆ Query re land spreading within the buffer zone

None of the complaints were substantiated following investigation by the EPA. In general they say that the compliance rate with required standards has been good.

The County Council Environment Section say that any complaints received by them in relation to the existing operation would be passed on to the EPA for investigation as the development has an IPC licence, which is subject to certain terms and conditions set out by the EPA.

The application for extension to the development has received a considerable number of complaints from the general public in the area relating to concerns of;

- ◆ Odour nuisance
- ◆ Pollution potential
- ◆ Seepage and leakage from proposed tanks
- ◆ Traffic
- ◆ Destruction of natural beauty



The following recommendations are given in relation to the application following examination of the EIS, planning application and public sector complaints;

Land Spreading

Spreading of digestate from the development on specific local lands, has been approved by the EPA. Application of digestate is subject to the Code of Practice for Landspreading. It is well known that land spreading is often not carried out in accordance with these requirements. Aeration of the digestate through high trajectory sprayplate method i.e. spraying up into the air, spreading during wet periods and outside the growing periods are common. It is significant that this development and proposed land spreading areas are within the catchment area of the Slaney and the Sow rivers, one of the main water supplies serving south Wexford. The possibility of poorly managed land spreading or accidental release of wastes into surface or groundwaters must be considered. Good farm practices are essential to prevent this from occurring which is dependant on the compliance of those carrying out the land spreading. It is proposed that spreading contractors and customer farmers will apply the digestate. These should be advised in writing of the requirements under the Codes of Practice for Land Spreading, the buffer zones required and the BATNEEC notes for the Pig Production Sector. Future monitoring of compliance with requirements would also be considered important.

Ground and Surface Water Pollution

Pig manure can cause serious water pollution if discharged directly to surface or ground waters. It typically contains high levels of manure and split feed resulting in high levels of total suspended solids, salts, biochemical oxygen demand and nutrients (particularly nitrates and phosphates). Anaerobic digestion as proposed reduces the organic pollution potential of animal slurries, the potential for pollution still cannot be overlooked however.

Ground water vulnerability has not been mapped by the Geological Survey of Ireland for County Wexford. Cognizance of the guidelines available however were used to undertake the study. The groundwater vulnerability falls under the categorization of extreme or high vulnerability. As mentioned above the development and proposed land spreading areas are also within the catchment area of the Slaney and the Sow rivers.

Poorly operated effluent treatment systems is a common cause of water contamination. A management plan based on HACCP Principals (Hazard Analysis Critical Control Points) should be employed by the operator to ensure routine visual inspections of structures, effluent loading/flow monitoring, sampling etc is properly carried out and recorded.

Odour Control

It is anticipated that the anaerobic digester will reduce the odour problems associated with piggeries and pig manure. It is worth noting that there is a potential for associated health impacts in odour sensitive people within small communities. Odour nuisance can lead to both physical and mental health effects. Surveys show that periods of odour nuisance often go together with headaches, nausea, sleep disturbances and loss of appetite or stress.

Community odour annoyance has been shown to be sensitive to the presence of multiple facilities in the area. A landfill site already operates across the road from this development and another site is proposed in the vicinity.

Proactive odour control can anticipate abnormal emission or dispersion conditions and allow the operator to change operating conditions accordingly (e.g. ventilation rates, feed regimes, times of odour release) or employ mitigation measures (e.g. reschedule compost turning, initiate scrubbing of pig shed emissions, provide temporary pond covers) and require short to medium meteorological parameters at the piggery source.

When I visited the site I did not note a foul smell however studies show high odour variability from this type of development based on temperature, humidity, windspeed, and direction.

Import of Organic Material

Import of 6000 tonnes of organic material is proposed to increase the efficiency of the proposed Anaerobic Digester. This material is to be added to the mixing tank. If this material will require storage on site is there an adequate storage capacity to facilitate this? Regard must also be had to legislative requirements involving the disposal of animal and food by-products or waste.

HEALTH SERVICE EXECUTIVE INTERDISCIPLINARY CONSULTATION

I have discussed this proposal with Dr Antoinette Rogers SAMO in relation to any complaints received or an unusual incidences of disease associated with the area of the existing development. She has not received complaints and is not aware of any high incidence or clusters of particular diseases in this area. She does not have any objections to the proposal. I also discussed the matter with Miriam Gaynor, SAMO, who also was not aware of problems, complaints or illnesses associated with the development.

Should you have any further queries please do not hesitate to contact me at the above number.

Yours Sincerely,

Kay O'Connor

Kay O'Connor

Environmental Health Officer

Agreed

John Redmond
10/11/05

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