



Eastern Regional Fisheries Board

Bord Iascaigh Réigiúnach an Oirthir



Fisheries Ireland

Our Natural Heritage

Environmental Protection Agency

26 OCT 2005

IPPC Licencing Section
Environmental Protection Agency
Johnstown Castle Estate
County Wexford

25 October 2005

EPA

MAIN FILE

Re: Application for an IPPC licence by Reenard Farms Ltd. at Killurin, Co. Wexford

Ref: EPA Reg. No. 742

PUBLIC FILE

EVALUATION FILE

DATE

26/10/05 (LX)

Dear Sir

Please note that the location of this proposed development is on the Banks of the River Slaney, which flows on into Wexford harbour. The Slaney is a designated river under the European Communities (Quality of Salmonid Waters) regulations 1978, and an important Spring Salmon & sea trout fishery, with important commercial and rod fisheries for both species. Wexford Harbour, the River Slaney main channel and many of its tributaries are already candidate Special Areas for Conservation (SAC), under the European Habitats Directive (Implemented into law by the Natural Habitats Regulations 1997).

The Board understands that after anaerobic digestion is complete, one is typically left with a liquid residue and a processed semi solid residue of high dry matter content. The liquid fraction has a lower dry matter content than the original slurry feed material, and typically has higher levels of available ammonia post digestion, the semi-solid residue has a very high phosphorous concentration. The proposed methods of storage / disposal for these two waste products, which should be considered a water pollution risk must be addressed fully in the context of this IPPC licence application.

The EPA Report, Water Quality in Wexford Harbour 2002, states that very high chlorophyll concentrations were recorded in the Deeps / Ferrycarrig area of the estuary and that there were also elevated BODs and variations in DO and pH levels in this stretch indicate eutrophic conditions, the report also states that ammonia concentrations (total & unionised) in the Wexford Town area are elevated, that nitrate concentrations in the lower freshwater reach of the river Slaney are elevated and that river monitoring data show that nitrate concentrations in the River Slaney have approximately doubled since 1980 (mainly as a result of more intensive farming practices).

We note that there will be an expansion at this facility with an additional 1000 fattening places, that approx. 10% (6000 tonnes) of the organic material used in the anaerobic digester will be imported belly grass, cake sludge and fish waste, and that much of the slurry used at this proposed facility will be imported from the Sloblands piggery linked to Reenard Farms Ltd. The Board also notes that the current IPC licence states that the operator shall provide a minimum of six months slurry storage capacity for waste destined for landspreading. The application states that slurry will arrive from the other piggeries on a basis of 9 loads per week and that these slurry transporters will leave with loads of liquid digestate. The application also states that after digester 2 and the centrifuge the liquid digestate will be transferred to the adjacent storage tanks via a sealed system. The site layout map showed a number of very small tanks adjacent to this site and the Board are concerned that the applicant hopes to landspread liquid digestate over the Winter / non- growing season. The Board request clarification on whether adequate storage (25 weeks) for digestate production over the winter / non growing season is proposed in addition to the 25 week capacity storage for slurry produced at the site.

We note the EIS states that it is planned to provide additional covered storage on or adjacent to customer farms to ensure that digestate is available for customer farms when they need

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it. The Board have serious concerns about the storage of digestate at customer farms. The EIS states that 25 week storage capacity will be provided at this site in case of extreme wet conditions, (we assume that this relates to both, pig slurry and digestate, and have requested clarification re. this) most likely over the winter season and that landspreading of wastes will take place only during the growing season. The Board notes that the majority of the customer farms are intensive dairy enterprises and assuming that they adhere to the "Code of Good Farming Practice", these farms are unlikely to have any spare capacity in their slurry storage tanks over the Winter months the only time of the year that that digestate storage capacity is likely to be a problem. It is essential that adequate storage capacity for both pig slurry and digestate produced over the 25 week period / non growing season are provided and the Board request that the applicant demonstrate that this slurry / digestate storage capacity currently exists. This storage capacity must take into account the expansion at this plant, the additional slurry arriving from the two other piggeries and the additional "other" organic matter used in the anaerobic digester.

The Board notes that after centrifuging the fibrous material is removed and transferred to a hay-barn for storage, elsewhere the application states that these solids will be composted. The Board have serious concerns regarding the storage of this semi-solid waste, which contains approx. 70 – 80% of the phosphorous in the original pig slurry. We believe that it represents a water pollution risk do not believe that the issue of disposal of this waste product has been adequately addressed. We request additional information regarding its storage and eventual disposal.

The Board welcome the fact that Wexford County Council, County Development Plan states that the precautionary principle will be applied in relation to the protection of water resources. The Slaney River is part of the South Eastern River Basin District Management System, a project in support of the catchment based national strategy to implement the Water Framework Directive. One of the objectives of the WFD is to achieve at least Q4 status on all waters by 2015.

Other concerns of the Board include

- (1) All surface water from this site should be passed through a petrol / oil interceptor and be subject to attenuation prior to discharge.
- (2) Adequate grease traps are installed.
- (3) All existing slurry storage tanks are checked to ensure that there are no losses to surface or groundwater
- (4) Systems should be put in place to ensure that there shall be no discharge of suspended solids or any other deleterious matter to watercourses during the construction phase and during any landscaping works.
- (5) All fuel & oil tanks must be adequately bunded.
- (6) All waste oil, empty oil containers and other hazardous wastes are disposed of in conjunction with the requirements of the Waste Management Act 1996.

The Board asks that a groundwater monitoring programme be undertaken at sites up-gradient and down-gradient of this facility as part of the conditions of this licence

Yours faithfully


Alan McGurdy
Chief Executive Officer