



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Sub No. (1)

Environmental Health Service
Primary, Community & Continuing Care
HSE West
St. Mary's Headquarters
Castlebar
Co. Mayo

☎ (094) 90 42260 / 90 42105
📠 (094) 90 27312

9th September 2013

Ms. Sonja Smith, (Programme Officer)
Environmental Licensing Programme,
Office Of Climate, Licensing & Resource Use,
EPA Regional Inspectorate,
Inniscarra,
County Cork.



EPA (Industrial Emissions)(Licensing) Regulations 2013

Applicant DINO Trading Ltd., Levalley, Ballinrobe, Co. Mayo.

Activity 6.2 Rearing of pigs in an installation, whether within the same complex or within 100metres of the same complex, where the capacity exceeds 2000 places for the production of pigs.

Ref No. P0981-01

Dear Ms. Smith,

Further to your correspondence seeking comments in relation to this application, I would like to bring the following to your attention for your consideration.

Information given in the environmental impact statement (EIS) is unclear in a number of areas.

The proposed development would result in the on-site generation of 14,280 M³ of pig manure to which another 11,550 M³ of mixed organic material would be added giving an annual amount of 25,830 M³ of material for processing through the biogas facility. The post process digestate would comprise 20,922 M³ of liquid digestate and 2325 M³ of fibrous/solid digestate.

If these figures are correct, then there is a significant shortfall in the movement of this material off-site as per the traffic movement tables on page 47 of the EIS.

Current operations generate 3,378 M³ of liquid manure for land spreading. (Appendix 5, page 6.) Traffic movements in this regard are given as 10 x 10 M³ loads x 32 week spreading window, totalling 3,200 M³. (A reasonable approximation of 3,378 M³) (EIS Page 47)

Proposed operations generating 20,922 M³ of liquid digestate are to be transported off-site in 10 x 15.5 M³ loads x 32 week spreading window, totalling 4,960 M³, less

2./

than 25% of the amount to be generated. (EIS Page 47). Even increasing the spreading window to 39 weeks, excluding the 15th Oct to 15th Jan period, will not allow for disposal of liquid digestate using the traffic movements provided.

The EIS states liquid digestate will be hauled both by tractor and lorry off-site, though section 3.7 refers only to tractor drawn tanker capacity being available to the applicant. If these tractor-drawn slurry tankers are utilised then traffic movements will be dependant on their individual volumes and would have to be calculated accordingly. If a large capacity lorry-drawn tanker is used, it will not be capable of being drawn onto fields for spreading, so transfer to smaller tankers/storage tanks will be required.

Haulage of fibrous digestate off-site to customers (EIS Page 47) is given as 248 weekly loads of 25 tonnes x 52 weeks, a total of 322,400 tonnes. Yet earlier information states that 2,324.7 M³ is all that will be generated. (Table 1.a Digestate production. Page 23)

Other than stating that fibrous digestate is to be delivered to customers, no further information appears to be given as to this process comparative to the information given for liquid digestate.

The noise monitoring surveys referred to in section 6.10, amount to 2 half hour monitoring periods on the morning of 13th April 2013 at 2 locations in the vicinity of the existing operation. Very little information is given in relation to noise and little can be determined from the information presented.

No reference appears to be given to the issue of rodent and flying pest control in the EIS, issues that have the potential to impair or interfere with amenities or the environment at the proposed installation or beyond the site boundaries at neighbouring lands/properties.

Yours Sincerely,



Tim Coffey SEHO