



Environmental Protection Agency
An Ghníomhaireacht um Uchtomhú Comhshaoil

Regional Inspectorate, McCumiskey House
Richview, Clonskeagh Road, Dublin 14, Ireland
Cigireacht Réigiúnach, Teach Mhic Chumascaigh
Dea-Radharc, Bóthar Cluain Sceach
Baile Atha Cliath 14, Éire

T: +353 1 268 0100
F: +353 1 268 0199
E: info@epa.ie
W: www.epa.ie

Toll Call: 1890 33 55 99

Mr. Tim Cullinan
Owner
Woodville Pig Farms Limited
Woodville Pig farms Ltd
C/o Michael Sweeney
NRGE Ltd, Mooresfort, Lattin
Co. Tipperary

21st January 2009

Reg No: P0467-02

Dear Mr. Cullinan

I refer to your application for a review of your Integrated Pollution Prevention and Control (IPPC) licence, which was received on 24 November 2008.

I am to advise that in accordance with the provisions of Section 90 of the EPA Acts 1992 to 2007, you are requested to supply the following additional information so that the Agency may complete a comprehensive assessment of the IPPC application:

1. Specify whether the installation is an industrial activity referred to in Annex I of the IPPC Directive (96/61/EC) and if yes specify the category.
2. Provide correct grid references for the locations of the proposed anaerobic digester site at Ballaghveny, the fattening unit at Ballyknockane and the breeding unit at Woodville.
3. Provide a location map (1:50,000 scale) with grid references, clearly identifying the proposed anaerobic digester site, the fattening unit and the breeding unit.
4. Provide site plans of the proposed anaerobic digester site, the fattening unit and the breeding unit with the complete boundary of each site highlighted in red.
5. Clarify the planning status in relation to:
 - (a) The proposed development of an anaerobic digester (Planning File No. 07/51/0108);
 - (b) The proposed new sow houses at Woodville Pig Farm. Provide the Local Authority Planning File Reference No.
6. Submit a copy of the planning permission and conditions granted for the fattening unit at Ballyknockane (Planning File No. 07/51/0106).
7. Submit any additional information provided to An Bord Pleanála in relation to the planning applications for the proposed development of the anaerobic digester and the fattening unit.

Note: Any *telephone enquiries* in relation to the above should be directed to **Anne Pearson** at the number above.
All *written communications and replies* should be directed to Sonja Smith, Office of Climate, Licensing & Resource Use, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.

8. Clarify animal numbers to be housed at the breeding unit and fattening unit, with reference to those numbers specified in the existing licence.
9. Clarify the quantity (m³) of slurry that will be produced annually at the fattening unit and the breeding unit. Clarify the total quantity of pig manure and waste organic materials to be treated in the proposed anaerobic digester annually.
10. Demonstrate that adequate lands are available for 2009 for the recovery of slurry / digestate generated by the proposed stock numbers and the imported organic material.
11. Complete the following table for each land parcel (i.e. customer farm).

Farm Code	Customer Farm (ha)	Organic N produced on customer farm (As per DAFF N&P statement kg/ha))	Requirement of customer farm to import organic N (up to 170 kg/ha)	Total N Kg delivered

Please note that the information required under Question 10 may be submitted in confidential format and shall be returned to the licensee, if requested, upon completion of the assessment by the Agency, to be retained on-site.

12. Provide a declaration by a suitably qualified person that the lands to be used in 2009 have been inspected and are suitable for landspreading of organic fertilisers, (as per Attachment 1).
13. Assess the potential odour impact of the proposed anaerobic digester with reference to the Agency publication 'Odour Impacts and Odour Emissions Control Measures for Intensive Agriculture'. Provide details of the mitigation measures that will be incorporated to prevent odour generation during the transfer of waste organic material into the top of the anaerobic digester mixing tank. Provide a numbered and suitably scaled map identifying the nearest sensitive receptors (dwelling houses etc) within 1000 metres of the proposed anaerobic digester site, fattening unit and breeding unit.
14. Provide details of the operational training which will be provided to staff prior to commencement of anaerobic digestion.
15. Provide a list of all raw and ancillary materials, substances, preparations, medicines, disinfectants, fuels and energy which will be used at the installation.
16. Provide waste licence / permit and waste collection permit details, including expiry dates where applicable, for waste disposal facilities used by the installation.
17. Complete Table I.2 (i) Groundwater Quality. Provide the most recent groundwater monitoring results for all three sites, if available.
18. Outline provisions to be made for response to emergency situations, particularly at the proposed anaerobic digester, outside of normal working hours. Describe the arrangements for abnormal operating conditions including start-up, leaks, malfunctions or momentary stoppages.

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19. Complete Section L Statutory Instruments of the licence application form in relation to "Fit and Proper Person".

20. Proposed Anaerobic Digester Site

Submit an appropriately scaled revised site plan(s) of the proposed anaerobic digester identifying the following:

- (a) proposed surface water monitoring point SW3, the rainwater flow, including all piped roof water and general flow of storm water from yard surface areas.
- (b) proposed soiled water / leechate collection and containment system;
- (c) proposed groundwater monitoring point AGW4 and any additional wells on-site;
- (d) any proposed wheel wash area;
- (e) waste storage and any fuel and ancillary materials storage areas;
- (f) centrifuge, combined heat and power (CHP) plant, GE Jenbacher gas engine, pasteurisation unit and proposed flare;
- (g) pumping arrangements for slurry / digestate between tanks on-site, and
- (h) a reference number identifying each proposed leak detection inspection chamber monitoring point.

Please clarify the following in relation to the proposed anaerobic digester:

- (a) identify the location of the water supply well and provide details of its extraction capacity (m³);
- (b) a list of the proposed types of organic waste materials to be accepted;
- (c) bunding arrangements for organic materials and fuel tanks;
- (d) operation parameters for the pasteurisation unit, including temperatures and holding times;
- (e) the megawatt rating of the proposed GE Jenbacher gas fuel engine;
- (f) the fuels to be used in the proposed dual fuel boiler;
- (g) details of the operating conditions of the proposed flare, including approximate usage times;
- (h) demonstrate by calculations that there is 26 weeks storage capacity available for liquid digestate and
- (i) the expected moisture content of the solid digestate produced and details of leachate management on-site. Confirm if the fibrous waste storage skip will be covered.

Provide a process flow diagram of the operation of the proposed anaerobic digester, to include a description of the operation of the pasteurisation unit, CHP plant and flare.

Fattening Unit

Submit an appropriately scaled revised site plan(s) of the fattening unit clearly identifying the following:

- (a) existing buildings and slurry storage tanks, overground tanks, ancillary materials and waste storage areas and the proposed arrangements for the location of three new fattening houses, new geomembrane covered slurry storage basin, ancillary materials and waste storage areas;
- (b) proposed slurry movements on-site, including all slurry storage tanks, channels, sluice gates and extraction points;
- (c) proposed surface water and groundwater monitoring points and any other additional wells on-site if applicable, and
- (d) a reference number identifying each proposed leak detection inspection chamber monitoring point.

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Please clarify the following in relation to the fattening unit:

- (a) fuel type used in the back-up generator, and
- (b) demonstrate by calculations that there is 26 weeks storage capacity available on site for slurry generated.

Provide details of the redevelopment of the fattening unit including approximate timeframes for implementation.

Breeding Unit, Woodville

Submit an appropriately scaled revised site plan(s) of the breeding unit, Woodville, clearly identifying the following:

- (a) existing buildings and slurry storage tanks, and the proposed new sow houses and any new / additional slurry storage capacity, locations for fuels, ancillary materials and waste storage areas, septic tank and percolation area;
- (b) proposed surface water monitoring points, including SW1 and SW2, the rainwater flow, including all piped roof water and general flow of storm water from yard surface areas;
- (c) groundwater monitoring points AGW1, AGW2, AGW3 and any additional wells on-site, and
- (d) a reference number identifying any proposed leak detection inspection chamber monitoring points.

Please clarify the following in relation to the breeding unit, Woodville:

- (a) demonstrate by calculations that there is 26 weeks storage capacity available on site for slurry generated;
- (b) the specifications of the septic tank and complete Table E.3 (i) Uncontaminated Emissions to Ground for the percolation area, and
- (c) the location of the water supply well(s) and provide details of extraction capacity (m^3).

In addition to the above please also provide an updated non-technical summary to reflect the information provided in your reply.

In the circumstances you should make immediate arrangements to have the required information (1 signed original, 1 hardcopy and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency without delay. Your response to this request should be directed to Sonja Smith Administration Officer, Office of Climate, Licensing & Resource Use.

Yours sincerely,



Anne Pearson, Inspector
Office of Climate, Licensing & Resource Use

Encl.

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Attachment 1: Sign-off of lands to be completed by suitably qualified person



I have completed Fertiliser Plans (Nutrient Management Plans) for farm references XX to receive slurry from IPC licensed site [insert name], Register Number P0XXX-XX during 200X. These Fertiliser Plans comply with the requirements of the European Communities (Good Agricultural Practice for Protection of Waters) Regulations, 2006 (S. I. No. 378 of 2006).

Summary information on the Fertiliser Plans is attached and the complete Fertiliser Plan as specified in Agency correspondence of 20th June 2007 is available on-site for inspection by any relevant Authority.

In my professional opinion, animal manures/nutrients may be used to fertilise any of those farmlands, and the application of pig manure/nutrients from the licensable site to any of those lands in a quantity identified in the Fertiliser Plan and manner that complies with the code of good agricultural practice and European Communities (Good Agricultural Practice for Protection of Waters) Regulations, 2006 (S. I. No. 378 of 2006), will not cause, and is not likely to cause, significant environmental pollution.

Signed

Insert Name

Insert Qualifications

Insert Date

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