

Ms. Dorothea Richards
Office of Climate, Licensing and Resource Use
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

10th September 2010

Re: I.P.P.C. Licence Review Application Reg. No. P0696-02
Mr. Jim & Mark Wright, T/A JMW Farms, Crosses, Monaghan, Co. Monaghan

Dear Ms. Richards,

I refer to previous Agency correspondence of 29th July last, with regard to the I.P.P.C. Licence Review Application made on behalf of Mr. Jim & Mark Wright for their pig farm at Crosses, Monaghan, Co. Monaghan. Please find detailed below the additional information requested;

1. Revised site plan including the storage area referred to, attached.
2. The bunded area has a gross storage capacity for c. 31.5m³. Each tank within this area has a capacity for c. 28 - 30 m³. It is intended to increase the height of this bunded area over and above the height of the adjoining manure storage tank, so that liquid from this bunded area can be diverted into this tank.
3. The concept behind the ventilation system in the houses at JMW Farms is that of a centralised exhaust system which optimises ventilation capacity. In effect the ventilation system can target ventilation to the different areas/rooms within the house as required. The advantage of such a system is that it is more energy efficient. The use of bigger fans in the duct system, which are more economical to run, also contributes to energy efficiency. All 3-phase fans are efficiently controlled by frequency control via the use of speed drives. Farrowing houses are controlled by a Freshnose system which means that an air inlet pipe is installed over each sow place, ensuring that each sow gets fresh air and there are no draughts to the piglets.

This ventilation system compares favourably with BERF for the Intensive Rearing of Pigs and Poultry 2003. As detailed in this document BAT for Pig housing is;

- “for mechanically ventilated houses; optimising the design of the ventilation system in each house to provide good temperature control and to achieve minimum ventilation rates in winter”
- “for mechanically ventilated houses; avoiding resistance in ventilation systems through frequent inspection and cleaning of ducts and fans.”

- All roof water from the two new pig houses is collected in the surface water storage tanks to the rear of house number 1. This water is then pumped into the overground water storage tank. Any excess water is diverted to the adjoining field drain and discharges at SW – 1.

All surface water to the front of the site will be collected and will discharge through proposed surface water discharge point SW – 2 as shown on the accompanying site plan.

The rain water harvesting practices on site are designed in line with sustainable drainage system principles so as to minimise stormwater discharge from the site. Collected stormwater is currently used for washing on the farm, however the applicants will explore any viable options for the use of collected rainwater elsewhere on the farm.

- The stormwater discharge along the northern boundary of the site is underground to the field drain running along the back of the site. This has been covered over. Although this drain opens at point SW – 1, the water at this stage is a mix of storm water from the site and the existing water in the drain. In order to get a representative sample of the water leaving the site, the monitoring point proposed is at the surface water storage tank before it leaves the site.

- Please refer to attached map.

- The layout of the leak detection system as constructed is as shown on the attached site plan. Drainage pipes have been laid underneath the slurry storage tanks as shown on the attached plan. These lead out to two inspection chambers. It is intended that these points would be inspected on a monthly basis for any sign of contamination and sampled annually for nitrates, ammonia and total phosphorous.

- There has been no history of odour complaints with this farm. There are no new dwellings that are likely to be significantly affected by this pig farm, completed since the original I.P.C. Licence was granted. It is anticipated that any potential odour from the development will be significantly lower given the state of the art buildings and ventilation system compared to the original buildings. These new buildings will ensure that all areas can be kept cleaned and well maintained thus minimising any potential odour emissions.

- The applicant's have significant experience in managing and operating other pig farms. This experience was of a major advantage in the planning, construction and operation of this pig farm. The applicants looked at numerous alternatives as to the design of the current development, however it was felt that the development as completed provided the best mix of labour efficiency, animal welfare, environmental protection, energy efficiency and development cost.

A number of alternatives were looked at as far back and the planning application including;

- Re-development of this farm as an integrated pig unit as it had operated at that time.
- Development of this farm as a pig fattening only unit.

Both of the above options were deemed to be less suitable than the development as completed.

Alternatives considered during the course of construction included;

- Natural ventilation, or normal ridge fan ventilation compared to the centralised ventilation system as installed.
- Use of the existing overground manure storage tank for manure storage purposes instead of rainwater harvesting. This was discounted as the underground manure storage tanks provided more than adequate storage capacity.

Please find details in relation to Section I.5 (a to f) of the application form outlined below;

(a) The best available techniques are or will be used to prevent or eliminate or, where that is not practicable, generally reduce an emission from the activity;

- As previously outlined the farm has been designed to minimise emissions and energy usage and to maximise performance on the farm.

(b) no significant pollution is caused;

- Leak detection system installed underneath new manure storage tanks.
- Bunded area for all liquid feeds.
- Separate clean and dirty water system.
- Slatted passageway and loading ramp for the movement and loading of pigs.
- Over ground manure storage tank taken out of use.

(c) waste production is avoided in accordance with Council Directive 75/442/EEC of 15 July 1975 on waste; where waste is produced, it is recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment;

- All waste produced on the farm is to be sent off site for disposal/recovery. Only authorised waste collectors will be used.

(d) energy is used efficiently;

- High insulation standards in all buildings.
- Efficient centralised ventilation system.
- Management routines will ensure that all equipment is kept well maintained, clean and fully serviced.

- (e) the necessary measures are taken to prevent accidents and limit their consequences;
- Bunded area for all liquid feed storage so as to ensure that any spills/leakages are contained.
 - Centralised slatted loading area for all pigs to ensure that there is no contamination of soiled water.
 - Centralised, concreted slurry extraction point to ensure that any spills in this area are collected.
 - Over ground manure storage tank taken out of use.
- (f) the necessary measures are taken upon definitive cessation of activities to avoid any pollution risk and return the site of operation to a satisfactory state.
- The site is a compact and well maintained site. Given the nature of the activities to be carried out at the site (i.e. pig rearing) there would be no materials on site that would pose a significant problem were activities on the site to be ceased. Pig manure would be supplied to existing customers. All wastes would be destined to existing waste contractors as agreed with the Agency.
10. The proposed well located off site is c. 400ft deep. As this well had no significant water yield it was not, and will not be, commissioned. No other information is currently available.
11. At present animal numbers are approaching maximum stocking rate, i.e. 1,200 sows in a breeding unit.

If you require any additional information please do not hesitate to contact me.

Yours Sincerely,

Paraic Fay B.Agr.Sc.

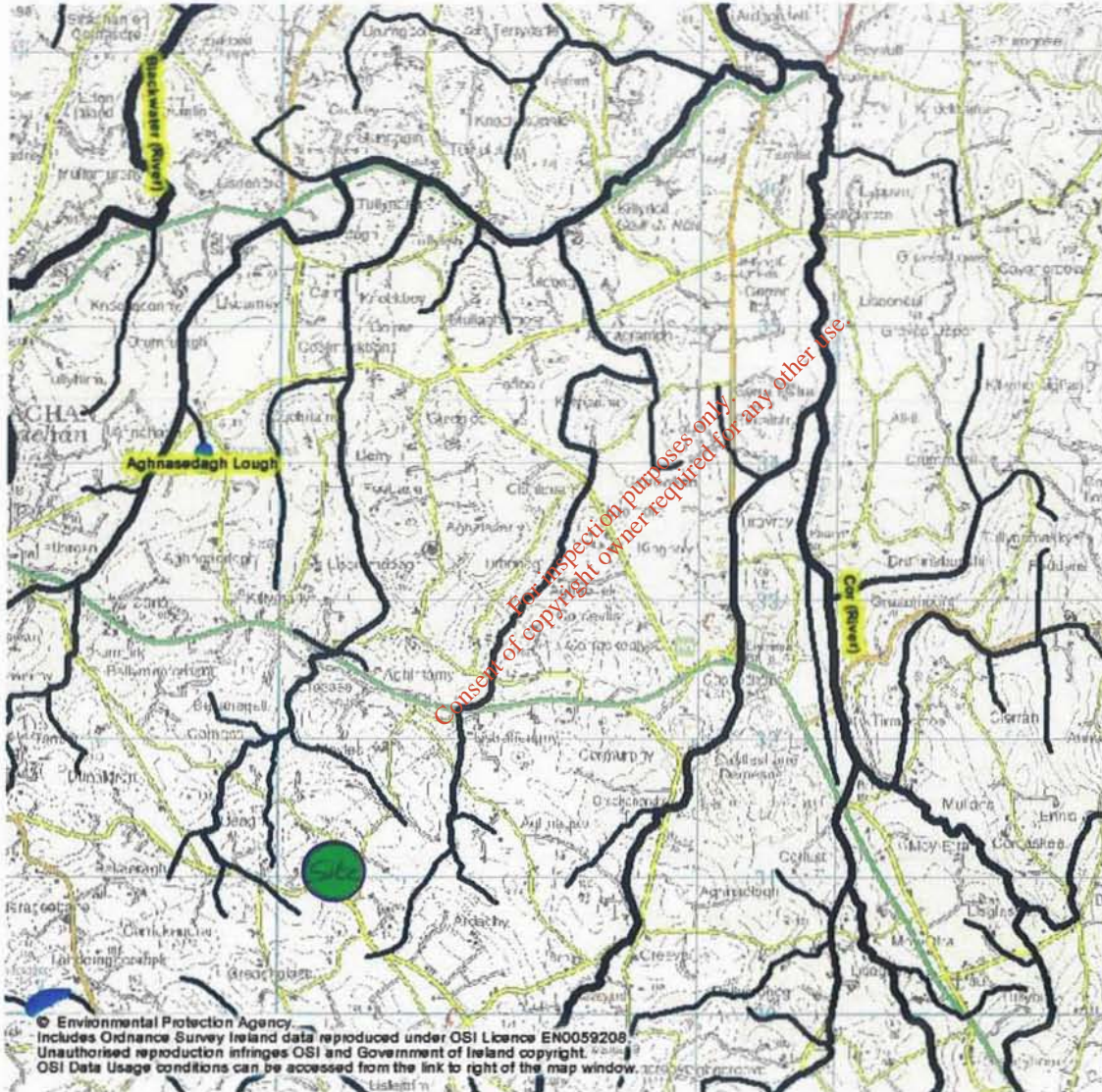


Environmental Protection Agency

EPA Maps Online

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