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OFFICE OF ENVIRONMENTAL LICENSING PROGRAMME (ELP)
ENVIRONMENTAL PROTECTION AGENCY,
P.P. BOX 3000,
JOHNSTOWN CASTLE ESTATE,
CO. WEXFORD.

7th October 2010

RE: IPC REG No PO 621-02

Dear Sir/Madam,

On behalf of my client Mr. Martin O' Donovan, of Cooligboy, Timoleague, Bandon, Co. Cork, I herein formally request clarification if the proposal to construct a new storm water monitoring point (SW2), can be accommodated by Technical Amendment, under his current IPPC Licence.

This issue arose following a recent review of storm water collection on his farm. The original plan at this site was to divert all storm water from the site to one monitoring point (SW1), but as outlined in correspondence submitted to the Agency on the 2nd Sept. 2010, this is not possible due to current pipe levels. I attach for your consideration in respect of this matter, the items listed below.

1. A map showing the on-site drainage system and location of the existing storm water monitoring point (SW1) and the proposed monitoring point (SW2).
2. A copy of the correspondence submitted to the Environmental Enforcement Section dated 2nd September, 2010, requesting this change.
3. A copy of the correspondence letter received from the Agency in response to our submission dated 30th Sept. 2010.

This proposed development will not result in any increase or change in emissions from this farm. The storm water collection system on site is directly connected to the roofs and the clean yard areas. All foul water, pig manure, and dirty yard run-off, is currently diverted directly to pig manure tanks under the existing house structures.

The current storm water monitoring point is monitored quarterly for COD levels, and we propose to undertake the same monitoring frequency for the new monitoring point.

I trust that the information attached is sufficient, but should you require additional detail, please do not hesitate to contact. This is a practical proposal to improve storm water collection and monitoring on site, in an affordable budget, within the current financial constraints effecting this sector.

Yours sincerely,

MICHAEL SWEENEY

Nutrient Recovery to Generate Electricity Ltd. Is Registered at Mooresfort, Lattin, Co. Tipperary.
Company Reg. No. 392619. Directors - M. Sweeney, N. Sweeney, E. Mc Eniry, M. Mc Eniry, Secretary

ENVIRONMENTAL PROTECTION
AGENCY

11 OCT 2010



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LINDA DALTON,
OFFICE OF ENVIRONMENTAL ENFORCEMENT
SOUTH/SOUTH WEST REGION
ENVIRONMENTAL PROTECTION AGENCY
INNISCARRA
CO CORK

2nd September 2010

RE: IPC REG No PO 621-02
Your Ref: P0621-02/nc061d

Dear Linda

On behalf of my client Mr. Martin O' Donovan, of Cooligboy, Timoleague, Bandon, Co. Cork, I herein acknowledge receipt of your correspondence dated 22nd July 2010, and herein respond, to the issues raised.

1. Response to sm041d issued 17/05/10

1.1 Response to Observation 1 (response to sm041d issued 17/05/10)

- The following are the details of deliveries to the listed farm codes to date this year. Farm codes 68, 69, and 71 have not yet received any deliveries of pig manure in 2010. Farm code 1 received 54 M3 in April 2010, and farm code 19 received 1161 M3 between February and April 2010. These deliveries were to land approved in the NMP 2010 report, which was approved by the Agency in correspondence issued on 3rd February 2010. The pig manure recovered in Farm Code 1 was on land owned and operated by Mr Martin O Donovan. A supplementary NMP report was submitted to the Agency on 26th July 2010, to include new farms to the customer list (FC 68, 69, 70, 71, 72 and 73), as well as making alterations to two existing farms (FC 1 and 19). Pig manure may be delivered to these new customer farms later this year if there are sufficient volumes available, and weather conditions are suitable.
- The map for farm code 1 was included in the confidential information pack submitted with supplementary NMP 2010 report dated 26 July 2010.
- With respect to the soil P testing the optimum time for soil analyses is in the closed period (Oct to Jan). In addition a technical review group are currently in discussion regarding this issue, with a view to providing a recommendation. I hope this review is completed shortly, as we will have to commence the preparation of the 2011 plan within the next few weeks.
- The customer farm maps on site are being reviewed to ensure that all relevant buffers are included.

1.2 Response to Observation 2

- A site map is included in Attachment 1, which shows the collection system for all storm water from the site, and the route by which it is delivered to a monitoring point. There are 2 No monitoring points. The first is the existing point SW1. The second is SW2, for which we herein request permission, and propose to monitor same in accordance with Schedule 3(i) Surface Water Discharge Monitoring. The volume of storm water to be diverted to these monitoring points is calculated in Tables 1 and 2 below.

SW1	Area
Fattening 10	1161.5
Fattening 8* 0.7	1515.85
Farrowing 16	309.6
House 4A	191.2
House 11A	207.6
New House 17	1635.5
Farrowing 7* 0.6	677.1
Dry Sow 4* 0.6	802.4944
Finishing 11	967.7
Total Area to SW 1	7468.6
Total Annual volume of Rainwater to SW 1 m3	8215.47

TABLE 1: Volume of storm water to monitoring point SW1.

SW2	Area
Fattening 9	1010.1
Fattening 8 * 0.3	649.65
Second Stage 5	240.8
First Stage 6	344.6
Second Stage 7	366.2
First Stage 2	85.0
First Stage 3	9.7
First Stage 15	81.1
First Stage 13	174.8
Second Stage 14	316.2
House 18	618.0
Farrowing 7* 0.4	451.4
Dry Sow House 12	582.5
Dry Sow 4* 0.4	534.9962
Total Area to SW 2	5465.1
Total Annual volume of Rainwater to SW 2 m3	6011.584

TABLE 2: Volume of storm water to monitoring point SW2

These two monitoring points both discharge into the adjacent forestry area to the south of the facility, through which it flows into a land drain, which adjoins a tributary stream of the Argideen River. We are currently reviewing the possibility of upgrading the pathway of storm water flow from this facility through the forestry section to the south of the unit.

- The drain referenced in the photograph No 3 is a manhole to provide access to rod the drain under the adjacent earthen bank. It is linked directly to the monitoring point SW1 as shown in photograph 1 included in Attachment 2. The algae growth on the concrete walls is due to the fact that this manhole is mainly left uncovered, allowing debris, and decaying plant growth from the

adjacent earthen bank to fall in and decay. This manhole has now been cleaned, and will be kept covered at all times in future.

- The pipe at the south western corner of the facility was originally installed as a cable duct to run electric cables to the proposed mill, from the office area. It was put in place when this entrance area was being concreted, to negate the requirement to cut up the concrete yard later. It has not been utilised as the mill was not constructed. Following investigation it was determined that the only potential source of contamination that could enter this pipe, would result from the dust around meal bins on the western side of the unit. As a result a dust collection system has been installed under each of these meal bins, (See photograph 6 in attachment 2), and the entry and exit of this pipe have been sealed up.
- The two pipes to the south of the main slurry collection point, divert storm water from the facility. The area from which it collects storm water is set out in Table 2 above, and their location is set out in the site layout plan included in Attachment 1. A new manhole has been constructed on this line (See photographs 2 and 3 in Attachment 2. It is proposed to monitor this in accordance with Schedule 3(i) of this IPPC License. In addition we are currently reviewing the possibility of upgrading the pathway of storm water flow from this facility through the forestry section to the south of the unit

1.3 Response to Observation 3

- The application of the sealant to the inside of each pen area has been completed. This was carried out as they were emptied. It was applied to the area between the fabricated structure, and the top of the tank, to divert any washwater back into the tank. This will be monitored, to ensure all wash water is being collected.

1.4 Response to Observation 7

- No sewage arising from the caravan located to the north of the facility is accepted to this facility.
- This caravan is currently outside of the licensed facility boundary.

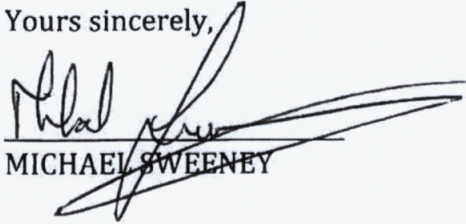
2. Response to sm07ld issued 24/05/10

2.1 Response to Non Compliance 1

- There are two groundwater sources currently used to supply water to this facility. These are AGW2, and AGW4. The location of these wells is shown on the site layout plan included in Attachment 1. A water metre is fitted to both of these wells (See photographs 4 and 5, in Attachment 2). The meter readings will be recorded monthly, and a record of these readings will be maintained on site, in the register format included in Attachment 3.

My clients would like to take this opportunity to thank the agency inspectors for their courteous and helpful manner, during the site inspections, and resultant meetings. They have instructed me to herein inform the Agency that they are committed to operating this facility to the highest standards, and commit to carrying out the necessary works schedule, to ensure same.

Yours sincerely,



MICHAEL SWEENEY

N.R.G.E. Ltd.
Nutrient Recovery to Generate Electricity Ltd.
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VAT. No: 6412619V

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MARTIN O DONOVAN'S PIG FARM NMP 2010

ATTACHMENT NO. 1

SITE LAYOUT PLAN & STRUCTURES TABLE

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FARM STRUCTURES TABLE

Martin O'Donovan.

*Covered Structures to Stormwater System SW1 9688
 *Covered Structures to Stormwater System SW2 3245.4
 Paved Areas to Stormwater System only 376
 Hardcore Area 1550

TITLE	STATUS	CLASS	STRU LGT (M)	CTURE WTH (M)	AREA SQ MTS	TOTAL AREA BIF	TANK WIDTH	TANK LENGHT	TANK DEPTH	CAPACITY CUBIC MTS	TOTAL CAPAC.BIF	EFFECTIVE CAPACITY WITH 100 FREE BOARD	TOTAL EFFECTIVE CAPACITY
Second Stage 1	Existing		28.5		366.2	366.2	12.85	28.5	1	366.23	366.23	329.6	329.6
First Stage 2	Existing		14.8		85.0	451.2	5.75	14.8	0.65	55.24	421.47	46.7	376.3
First Stage 3	Existing		5.7		9.7	461.0	1.7	5.7	0.65	6.33	427.80	5.4	381.7
DrySow 4	Existing		118.4		1337.5	1798.4	11.3	118.4	1.2	1604.99	2032.79	1471.2	1852.9
Second Stage 5	Existing		22.5		240.8	2039.2	10.7	22.5	1	240.75	2273.54	216.7	2069.6
First Stage 6	Existing		30.1		344.6	2383.8	11.45	30.1	0.76	261.93	2535.47	227.5	2297.1
Farrowing 7	Existing		92.5		1128.5	3512.3	12.2	92.5	0.75	846.38	3381.84	733.5	3030.6
Fattening 8	Existing		177.5		2165.5	5677.8	12.2	177.5	1.2	2598.60	5980.44	2382.1	5412.7
Fattening 9	Existing		77.4		1040.1	6687.9	13.05	77.4	1.2	1212.08	7192.52	1111.1	6523.7
Fattening 10	Existing		91.1		1161.5	7849.4	12.75	91.1	1.5	1742.29	8934.81	1626.1	8149.9
Finishing 11	Existing		76.8		967.7	8817.1	12.6	76.8	1.22	1180.57	10115.38	1083.8	9233.7
Dry Sow House 12	Existing		41.3		582.5	9390.6	14.12	41.25	1.22	710.59	10825.97	652.3	9886.0
First Stage 13	Existing		13.9		174.8	9574.1	12.6	13.87	0.91	159.03	10985.00	141.6	10027.6
Second Stage 14	Existing		24.9		316.2	9890.6	12.7	24.9	0.91	287.77	11272.77	256.1	10283.7
First Stage 15	Existing		14.8		81.1	9971.7	5.49	14.78	0.91	73.84	11346.61	65.7	10349.4
Farrowing 16	Existing		29.8		309.6	10281.3	10.4	29.77	0.76	235.30	11581.92	204.3	10553.8
House 17	Existing		120.3		1635.5	1916.8	13.6	120.3	0.76	1243.01	12824.92	1079.5	11633.2
House 18	Existing		49.1		618.0	12534.9	12.6	49.05	0.76	469.70	13294.63	407.9	12041.1
House 4A	Existing		16.5		191.2	12726.0	11.6	16.48	0.76	145.29	13439.91	126.2	12167.3
House 11A	Existing		16.48		207.6	12933.7	12.6	16.48	0.76	157.81	13597.73	137.0	12304.4
Dry Sow House	Proposed		71.05		0.0	1563.1	22	71.05	0.6	937.86	937.86	781.6	781.6
Dry Sow Channel	Proposed						1	71.05	1.8	127.89	1065.75	120.8	902.3
Mill	Proposed		24.4		447.7	2010.8	18.35						
Portal Frame Shed	Approved	8	24.6		376.4	376.4 *	15.3						
Digester	Approved		15.0		176.7	553.1 *	15	15	8	1413.90	1413.90	1413.9	13718.3
Secondary Digester	Approved	8	18.0		283.6	836.7 *	19	19	4	1134.26	2548.16	1134.262	14852.51886
Gas Holder	Approved	8	15.0		176.7	1013.4 *	15						
Concrete Apron	Approved	8	24.6		376.4	376.4	15.3						
Basin	Approved	8	40.0		1600.0	1600.0	40	40	4	6400.00	8948.16	6240	21092.51886
Feedmill	Approved		11.1		151.959	1752.0	13.69						
Bins1	Approved				7.38	1759.3							
Bins2	Approved				7.38	1766.7							
Bins3	Approved				7.38	1774.1							
Bins4	Approved				7.38	1781.5							
Bins5	Approved				13.12	1794.6							
Bins6	Approved				13.12	1807.7							

Based on Annual Volume of 1.1m at Cork Airport

SW2	Area
Fattening 9	1010.1
Fattening 8 * 0.3	649.65
Second Stage 5	240.8
First Stage 6	344.6
Second Stage 1	366.2
First Stage 2	85.0
First Stage 3	9.7
First Stage 15	81.1
First Stage 13	174.8
Second Stage 14	316.2
House 18	618.0
Farrowing 7* 0.4	451.4
Dry Sow House 12	582.5
DrySow 4* 0.4	534.9962
Total Area to SW 2	5465.1
Total Annual volume of Rainwater to SW 2 m^3	6011.584

SW1	Area
Fattening 10	1161.5
Fattening 8* 0.7	1515.85
Farrowing 16	309.6
House 4A	191.2
House 11A	207.6
New House 17	1635.5
Farrowing 7* 0.6	677.1
DrySow 4* 0.6	802.4944
Finishing 11	967.7
Total Area to SW 1	7468.6
Total Annual volume of Rainwater to SW 1 m^3	8215.47

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MARTIN O DONOVAN'S PIG FARM NMP 2010

ATTACHMENT NO 2

PHOTOGRAPHS

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Photograph 1: Storm water monitoring point SW1, and adjacent manhole, at south eastern side of unit



Photograph 2: New storm water monitoring point SW2



Photograph 3: Storm water monitoring point SW2, with internal dipper.

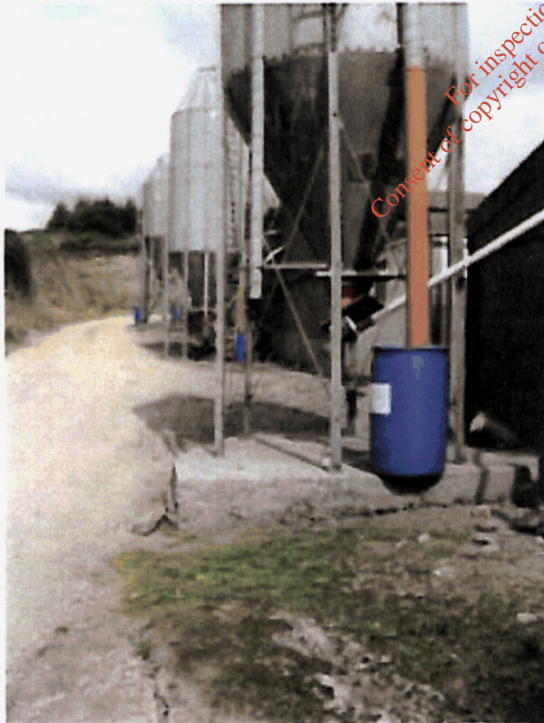


Photograph 4: Water Meter for well AGW4

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Photograph 5: Water Meter for well AGW2



Photograph 6: Dust collectors on meal bins on the western side of the unit

MARTIN O DONOVAN'S PIG FARM NMP 2010

ATTACHMENT NO 3

WATER METRE RECORD

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