



Electronic Copy

On behalf of William Connolly & Sons Unlimited Company

20 November 2018

Reg. No.: P1069-01

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from William Connolly & Sons Unlimited Company for an installation located at William Connolly & Sons Unlimited Company, Grange Lower, Goresbridge, Kilkenny, R95 EKH4

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 06 March 2018. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. Provide a copy of the Planners Report and Final Decision for Planning Ref: 17/641. Provide clarification from Kilkenny County Council as to whether an EIS or EIAR was required. (Regulation 9(2)(e)).
2. Resubmit the installation boundary map to include the existing constructed wetland (and future wetland if proposed) and the sanitary effluent wastewater treatment system. Provide the area in hectares for the revised boundary (Regulation 9(2)(m)).
3. Clarify whether animal raw material is used in the process and whether there is any proposal to use it in the future (Regulation 9(2)(f)).
4. Typical operating hours are provided as 12 hours/day pre-harvest and 24 hours post-harvest. Clarify what months are pre and post-harvest. (Regulation 9(2)(i)).
5. Complete Table G.1 to include amount of materials stored and annual use (Regulation 9(2)(f)).
6. In relation to air emissions (Regulation 9(2)(i)):
 - a. Provide the rated thermal input (in MegaWatts) for the two boilers associated with emission points A1-1 and A-2.
 - b. Provide a description of boiler operation and purpose (for generation of water or steam etc.) for which the stages of the process.
 - c. Clarify whether the dryers have an emission point for combustion gases and provide details in Section 7.4.1 Emissions to Air, where relevant.
 - d. Provide maximum emission values (including flow rates in m³/hour and m³/day) for the boiler emission points. Have regard to the *European Union (Medium Combustion Plants) Regulations 2017 (S.I. 595 of 2017)*, where applicable.
 - e. Provide the flow rates in m³/hour and m³/day) for all main emissions to air.
 - f. For the air monitoring reports submitted clarify the emission point reference numbers (A2-1, A2-2 etc). (Regulation 9(2)(j)).

- g. Assess the impact of emissions to air using air dispersion modelling having regard to '*Air Dispersion Modelling from Industrial Installations Guidance Note (AG4)*' (EPA). You may also have regard to '*Process Guidance Note 6/26 (13) Statutory guidance for animal feed compounding*' (DEFRA, UK). (Regulation9(2)(k)).
 - i. Include all main process emission points and A1-1 and A1-2 for all relevant parameters.
 - ii. The modelling report shall include tabulated input data of flow rates, concentrations, mass emissions, temperature and efflux velocities.
 - h. Show the location of all main emission points to air on a site drawing.
 - i. Detail the abatement systems (cyclone/bag filters) on the main emissions to air. Provide the efficiency rating/performance specifications for all air abatement equipment.
 - j. Resubmit the table 'Waste Gas - Abatement /Treatment Control' for the air abatement systems and include details of measures in place to prevent and identify abatement failure e.g. Bag filter integrity, air flow, differential pressure gauges. (Regulation9(2)(g)).
7. In relation emissions to water and storm water discharges (Regulation9(2)(k)):
- a. Part of the application e.g. Non-Technical Summary (NTS) states that all storm water discharges via oil separators to the constructed wetland, clarify if this is correct. Provide a clear description of the drainage system.
 - b. In the assessment of the storage BREF it states that all grain is stored in storage sheds, clarify if this is the case.
 - c. Provide a drainage drawing to include the following:
 - i. All oil interceptors and areas draining to these; areas draining to the constructed wetland and other areas e.g. hardcore.
 - ii. Storm water drainage pipelines discharge locations to surface water and grid reference coordinates (6E, 6N).
 - d. Specify the type of oil separators in place (Class I or II and full retention or bypass). Clarify if there are any silt traps in place and provide their locations.
 - e. Clarify if the storm water discharge outfall pipe from the southern area of the site is accessible for monitoring.
 - f. Provide a monitoring location for both the discharge from the grain yard area to the wetland and the discharge from the wetland to the watercourse.
 - g. The NTS refers to the water treatment system and a fish tank for assessment of treated water, clarify how this relates to the installation. Also, provide further details on the separation tank, its location and purpose.
 - h. Regarding the surface water laboratory reports, show monitoring locations on a drawing and clarify if they correspond with Locations 1-7 on drawing IE1540-001.
 - i. Submit Appendices A, D and E of the 2013 ICW planning report.
 - j. Confirm whether the truck wash and water treatment system on the site plan are operational.
 - k. Provide details of any water treatment for abstracted water (softening etc.).
 - l. Provide a copy of the discharge licence for the fish farm.

8. Provide the following information for the constructed wetland (Regulation 9(2)(k)):
 - a. Provide available monitoring data for the wetland inlet and outlet during and outside the harvest period and an interpretation of the results.
 - b. Provide an assessment of the performance in terms of removal efficiency (for parameters including BOD, COD, suspended solids, ammonia, orthophosphate) of the wetland since its installation.
 - c. Clarify whether the wetland is desludged, how frequently, and provide details of the destination and method of recovery or disposal for the sludge and the waste code, where applicable.
9. Confirm whether there are any wastes or residues arising from processing of raw materials and provide details of quantities, waste codes and destinations. (Regulation 9(2)(t)).
10. The Baseline Report (Screening) refers to a 5,000 litre diesel tank, however the site plan shows several fuel tanks. Provide details on the fuels stored, purpose and the capacity of each tank. In Section 4.6 a fuel type is listed as other (401m³/year), clarify the fuel type. (Regulation 9(2)(r)).
11. Provide a Baseline Report having regard to European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EC on industrial emissions (2014/C 136/03) published on 6th May 2014. (Regulation 9(2)(r)).
12. In relation to the requirement to limit, reduce or abate emissions (Regulation 9(2)(k));
 - a. Provide measures taken or planned in the future to limit noise emissions at the installation;
 - b. Provide measures taken or planned to minimise dust deposition levels at the installation.

A screening for Appropriate Assessment was undertaken on 20 November 2018 and the Agency determined that an Appropriate Assessment of the activity is required. You are thereby required to submit a Natura Impact Statement, as defined in Regulation 2(1) of the European Communities (Birds and Natural Habitats) Regulations 2011 as amended. The NIS shall address all emissions from the installation.

You are furthermore advised to refer to the document '*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*', issued in 2009 by the Department of the Environment, Heritage and Local Government, and revised in 2010. This document is available on the National Parks & Wildlife Survive website at:

http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within **12 weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact licensing@epa.ie.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at <http://www.epa.ie/pubs/forms/lic/industrial%20emissions/licenceapplicationformguidance.html>.

Please direct any queries to licensing@epa.ie.

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053 – 9160600