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Mr. Paraic Fay

On behalf of Doon Farm Enterprises Limited

22 April 2020

Reg. No.: P1024-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from Doon Farm Enterprises Limited for an installation located at Doon Farm Enterprises Limited, Doon, Araglin, Kilworth, County Tipperary

Dear Mr. Fay,

I refer to the application for a licence received by the EPA on 03 April 2017.

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. It is noted that the site location address varies throughout the application form and supporting documentation, varying between Counties Tipperary and Cork. You are required to:
 - a) Clarify the exact legal address at which the activity is located; and
 - b) Confirm that the documents used in support of this application relate to the Tipperary address and that any references to the site's location being in Cork are incorrect.
2. It is noted that a number of planning permissions have been granted for the site of the activity since the licence application was submitted to the EPA on 03 April 2017. In relation to the planning permissions granted at the site where the licensable activity is and will be carried out, provide the following documentation:
 - a) A full planning history for the site;
 - b) For all planning permissions granted since Planning Permission 07/1368, relating to the site, provide written confirmation from the planning authority as to whether or not an EIA was required, by or under the Planning and Development Act 2000, as amended;

- c) A copy of Tipperary County Council's final decision or grant of planning permission associated with planning application reference 19/601471;
 - d) A copy of Tipperary County Council's planning inspector's report (planner's report) associated with planning application reference 19/601471;
 - e) Confirm the current status of the development works as permitted by all planning permissions granted for the site. In addition:
 - Where the development works have been completed, confirm whether the associated infrastructure is operational; and
 - Where the development works have not yet been completed, provide a proposed development schedule for construction works on site.
3. Having regard to the capacity for animals outlined in the application (as per your response received 23 October 2018), and to the planning permissions granted for the site, provide the following:
- a) Clarify the authorised capacity at the site of the activity, in terms of animal numbers permitted by the Planning Authority;
 - b) Having regard to point 3a) above (animal numbers permitted by planning permissions), clarify the capacity to which this licence application is being made, in terms of animal numbers by animal type, (include all animal categories);
 - c) Clarify the animal capacity used to determine the figures and calculations provided with the application; and
 - d) Having regard to points a) (*animal numbers authorised by planning permissions*) and b) (*animal numbers applied for in licence application*) above, and in the case that the figures/calculations that have been previously provided are based on a different capacity to your answer in b) above, provide updated figures/calculations based on the revised stocking rate for which the application is being made. For example, revised figures/calculations may need to be submitted for resources used, wastes generated, organic fertiliser produced and storage facilities, emissions etc.
4. It is noted that the source of water for the activity is an offsite well. However, the site layout plan, received in your response received 18 April 2018, includes a grid reference for a well, which appears to be an incorrect grid reference.
- a) For clarity, provide a revised grid reference for this well, or remove the reference to it from the site layout map.

5. In relation to the proposed / existing storm water collection system;
 - a) Provide a description and map outlining the surface water pathway between the storm water discharge point and the local watercourse;
 - b) Identify any mitigation measures which are or will be installed prior to the storm water discharge point;
 - c) If a soakaway is or will be installed, provide a description of same; and
 - d) Update the site plan as per points a) to c) above.
6. In relation to the site office referred to in the application:
 - a) Confirm the location of the site office, and specify whether it is within the site boundary;
 - b) Confirm if sanitary facilities are or will be provided;
 - c) Confirm, where applicable, the type of system that is or will be provided for the treatment of sanitary effluent arising onsite and the location of same; and
 - d) Where applicable, submit a revised site plan that clearly depicts the location of any existing or proposed office and associated sanitary facilities within the installation boundary.
7. It is noted that the documentation regarding BAT (Best Available Techniques) has not been fully completed.
 - a) Provide clarifications on the BAT conclusions from the Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017) clearly identifying the specific techniques that will be used for each BAT.
8. Regarding Raw Materials, Intermediates and Products to be used on-site (in particular disinfectants, detergents, water sanitation chemicals, gas and diesel):
 - a) Provide the hazard statement, amounts stored, and amounts used annually; and
 - b) Provide details of the storage facilities.
9. In relation to the removal of animal carcasses from the site, provide the following:
 - a) Provide details of the current contractor who removes animal carcasses from the site, including relevant authorisation they hold to transport materials under the Animal By-Product Regulations, as amended.
10. In relation to proposed vermin/pest control at the installation, provide the following:
 - a) Provide details regarding any storage of any waste associated with vermin/pest control; and
 - b) Provide details of any proposed transporter of vermin/pest control waste.

11. In relation to organic fertiliser produced by the activity:
- a) Having regard to item 3 above, clarify the maximum quantity of organic fertiliser that will be generated by the activity per annum based upon the maximum number of pigs which will be accommodated.
 - b) Clarify the total organic fertiliser storage capacity that will be on site upon completion of the any proposed development or on foot of any approved planning permissions (include both total capacity and capacity minus the freeboard);
 - c) Confirm whether 26-weeks storage capacity is or will be available onsite and/or offsite;
 - d) In relation to any organic fertiliser produced by the existing activity, provide a copy of the Record 3 form (as required under Article 23 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 as amended, for the previous year (i.e. 2019);
 - e) With reference to the 'Coded Table of Slurry Spreading Lands' provided as part of the application:
 - A revised table should be submitted if the previously received information is now outdated;
 - Provide the county in which each of the land parcels is located;
 - Provide details of the import capacity in m³ of each of the lands identified.
 - f) Provide details including the total area of land (in hectares) available for the receipt of organic fertiliser. The total import capacity available should also be provided and at least equal the maximum quantity of organic fertiliser generated per annum by the activity; and
 - g) Confirm that the lands have a capacity to accept the organic fertiliser generated and include a brief description of how import capacities were calculated.

12. Provide an assessment of the impact of odour emissions from the activity and the impact of odour emissions on local residents. The assessment of odour emissions should be supported by use of a model to predict odour concentrations at the sensitive receptors in the vicinity of the installation. The assessment should, as appropriate, identify odour reduction/mitigation measures.

Odour contour maps are available in the EPA published report entitled *Odour Impacts and Odour Emission Control Measures for Intensive Agriculture*, located [Here](#) on the EPA website.

13. The application states that a back-up generator will be present on-site on an impermeable concrete base and will not be moved.

- a) Confirm the location of the back-up generator on-site and its bunding arrangements.

14. A screening for Appropriate Assessment was undertaken on 21 April 2020 and the Agency determined that an Appropriate Assessment of the activity is required. Screening undertaken by the Agency, using SCAIL Agriculture, has shown that ammonia in air emissions from the activity have the potential to contribute to elevated ammonia levels and nitrogen deposition at European sites.

- a) 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 (S.I. No. 477 of Regulations 2011 as amended).

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 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

- b) Please note that a screening tool 'Simple Calculation of Atmospheric Impact Limits' (SCAIL) is available at: <http://www.scail.ceh.ac.uk>. Submit the following details that are required in order to carry out the SCAIL assessment (including all input parameters) for both animal housing and organic fertiliser storage facilities.

- For each animal house include building/stack heights (m), ventilation details, number of fans, fan(s) location, fan(s) diameter, fan(s) flowrate (m³/s); housing floor area (m²), livestock number by animal type for all animals (e.g. farrowing sow, production pig etc.) and flooring type (e.g. fully slatted floors etc.).

In addition to the above, please also provide an updated non-technical summary 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 *four months* 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,

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