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Mr. Timothy Cullinan

On behalf of Woodville Pig Farms Limited

14/10/2020

Reg. No.: P0467-03

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Woodville Pig Farms Limited for an installation located at Woodville and Ballyknockane, Ballymackey, Nenagh, County Tipperary, E45 TY03.

Dear Mr. Cullinan,

I refer to the application for a licence received by the EPA on 26 May 2020.

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. Confirm the current status of the development works as permitted by all planning permissions granted for the site. In addition:
 - a. Where the development works have been completed, confirm whether the associated infrastructure is operational; and
 - b. Where the development works have not yet been completed, provide a proposed development schedule for construction works on site.
2. Provide the current and proposed stocking rate of each animal type in accordance with the definitions in the Commission Implementing Decision (EU 2017/302) establishing best available techniques (BAT) conclusions for the intensive rearing of poultry or pigs, i.e. weaners, production (finishing) pigs, and sows. Pre-finishers is not a recognised category of pig.
3. What is the predicted future electricity usage of the expanded site?
4. The given calculation of slurry production for the Woodville site does not include weaners. Provide a recalculated figure to include all stock onsite.
5. Provide information as to whether it is intended to store pig feed within the proposed site boundary or in the area to be used by Tipperary Milling Company Limited.

6. Provide an assessment of the impact of odour emissions from the proposed expansion of 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.
7. Clarify and provide a map showing the location and distance from the proposed installation to the closest third-party dwelling houses. The map should also highlight which dwellings are family dwellings, and which are third party dwellings.
8. With regard to the storm water drainage system, identify any appropriate mitigation measures (such as silt traps/swales) which are installed or will be installed prior to the surface water discharge points.
9. It is noted that the documentation regarding BAT (Best Available Techniques) has not been fully completed.
 - a. Regarding the Woodville Breeding Unit, 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. Note the following:
 - i. The application form states that BAT 16.a.2 will be implemented. Clarify how BAT 16.a.2 will be implemented.
 - ii. BAT 27 is applicable to all sites.
 - iii. Note BAT 30 a(i) and(ii) refer to the principles underlying ammonia emission reduction, not the techniques by which it will be implemented. The applicant shall specify the techniques that will be implemented to achieve compliance with this BAT.
 - iv. The applicant has indicated that BAT 30b is “to be implemented in line with updated licence requirements”. There are no standard licence requirements in this regard, the licence will reflect the techniques detailed by the applicant. It is necessary therefore that the applicant provide information as to how and when BAT 30b is to be implemented.
 - b. Assessments against the following BREFs have not been submitted; tabulate any relevant conclusions on BAT from the following BREF documents:
 - i. Reference Document on Best Available Techniques for Energy Efficiency, February 2009; and
 - ii. Reference Document on Best Available Techniques on Emissions from Storage, July 2006.
 - c. You are required to review the **entire installation**, i.e. including the Ballyknockane Finishing Unit, against the BAT conclusions from the CID and relevant BREF documents requirements as set out above and demonstrate how BAT requirements are or will be satisfied at your installation.

10. A screening for Appropriate Assessment was undertaken on 23rd September 2020 and the Agency determined that an Appropriate Assessment of the activity is required. This was notified to you on the 23 September 2020.

- a. You are hereby reminded that you are 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.
 - i. 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. production pig etc.) and housing system/flooring type (e.g. fully slatted floors, low ammonia emission housing etc.).
 - ii. For organic fertiliser (manure/slurry) storage on-site include the type of storage (e.g. slurry - circular store, lagoon) and associated details (e.g. rigid cover/no cover), capacity, and area of storage (m²).

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 **8 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,



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