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On behalf of Harvest Lodge Pigs Ltd (P0412-01) Gortnamuc, Kilcormac, Offaly in Relation to an Application for a Licence Review. AUGUSII 2020 Store of total

Harvest Lodge Pigs Ltd Baseline Screening Report

This Baseline Report was completed in accordance with the

European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions (2014/C 136/03)

1.0 Introduction

The purpose of this report is to compile a baseline report in respect to Harvest Lodge Pigs Ltd Licence review application in relation to their pig development at Gortnamuc, Kilcormac, Offaly.

NRGE Ltd were engaged by Harvest Lodge Pigs Ltd to prepare a licence Review Application and all associated reports required with the application.

Article 22(1) of Directive 2010/75/EU on industrial emissions (IED) provides that, 'Without prejudice to Directive 2000/60/EC, Directive 2004/35/EC, Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration (1) and to relevant Union law on soil protection, the competent authority shall set permit conditions to ensure compliance with paragraphs 3 and 4 of this Article upon definitive cessation of activities'.

Article 22, paragraphs 2 to 4, contains provisions for the definitive cessation of activities involving the use, production or release of relevant hazardous substances in order to prevent and tackle potential soil and ground water contamination from such substances. Act y tool in this respect is the establishment of a 'baseline report'. Where an activity involves the use production or release of relevant hazardous substances and having regard to the possibility of soil and groundwater contamination, a baseline report is to be drawn up before starting the operation of the installation or before a permit for the installation is updated for the first time after 7 January 2013. The report will form the basis for a comparison with the state of contamination upon definitive cessation of activities. Where information produced pursuant to other national or Union law reflects the state at the time the report is drawn up, that information may be included in, or attached to, the baseline report.

Article 3(19) of the IED clarifies that the baseline report needs to provide information on the state of soil and groundwater contamination by relevant hazardous substances.

There are a number of stages required to be assessed on whether or not a baseline report is required or not

- stages 1-3: to decide whether a baseline report is required;
- Stages 4-7: to determine how a baseline report has to be prepared;
- Stage 8: to determine the content of the report.

It must be noted that where during stages 1-3 it is demonstrated on the basis of the available information that a baseline report is not required, there is no need to progress to the later stages. A record of such a demonstration should be made and held by the competent authority, including the reasons for such a decision.

2.0 Determination if a Baseline Report is Required step 1-3

Stage	Activity	Objective
1	Identify which hazardous substances are used, produced or released at the installation and produce a list of these hazardous substances.	Determine whether or not hazardous substances are used, produced or released in view of deciding on the need to prepare and submit a baseline report.
2	Identify which of the hazardous substances from Stage 1 are 'relevant hazardous substances' (see Section 4.2). Discard those hazardous substances that are incapable of contaminating soil or groundwater. Justify and record the decisions taken to exclude certain hazardous substances.	To restrict further consideration to only the relevant hazardous substances in view of deciding on the need to prepare and submit a baseline report.
3	For each relevant hazardous substance brought forward from Stage 2, identify the actual possibility for soil or groundwater contamination at the site of the installation, including the probability of releases and their consequences, and taking particular account of: — the quantities of each hazardous substance or groups of similar hazardous substances concerned; — how and where hazardous substances are stored, used and to be transported around the installation; — where they pose a risk to be released; — In case of existing installations also the measures that have been adopted to ensure that it is impos sible in practice that contamination of soil or groundwater takes place	To identify which of the relevant hazardous substances represent a potential pollution risk at the site based on the likelihood of releases of such substances occurring. For these substances, information must be included in the baseline report

Stage 1

The development at Harvest Lodge Pigs Ltd is the rearing of pigs ready for processing once they reach the desired market weight, the pigs are then brought to a pig processing plant

This is an existing site that has an excellent compliance history with no records of incidents or contamination to soil/groundwater.

Hazardous Substances used

There are no hazardous substances used on site with the exemption of a small proportion of fluorescent tubes for lighting, some disinfectants that may contain hazardous substances and diesel for the backup generator. It must be noted that all fluorescent tubes are stored in special designated coffins which are collected by an approved haulier.

Hazardous Substances Produced

There are no hazardous substances produced on site

Hazardous Substances Released

No hazardous substances are released on site

Stage2

Relevant hazardous substances' (Article 3(18) and Article 22(2), first subparagraph) are those substances or mixtures defined within Article 3 of Regulation (EC) No 1272/2008 on the classification, labelling and pack aging of substances and mixtures (CLP Regulation) which, as a result of their hazardousness, mobility, persistence and biodegradability (as well as other characteristics), are capable of contaminating soil or groundwater and are used, produced and/or released by the installation

Hazardous substances mentioned in Stage 1 above

- 1. Fluorescent Tubes: Contains mercury EC No: 231-106-7 as per Article 3 of Regulations No 1272/2008
- 2. Diesel: EC No 302-695-9 as per Article 3 of Regulations 1272/2008

Stage 3

1. Fluorescent Tubes:

The quantity of tubes used on site is minimal and any used is only when tubes have run its course, it's a replace only system and all old tubes are stored in designated coffins on an impervious floor which eliminates breakage. Once the coffin is filled, they are removed of site by a certified haulier to an appropriated facility.

There is no Potential for Contamination of soil groundwater as there is no source/receptor It can therefore be concluded that it can be excluded from further consideration in stages 4-7

2. Diesel:

Diesel usage on site is minimal and is only used for the backup generator which is self bunded on an impervious surface.

Therefore, there is <u>No Potential for contamination of soil/groundwater</u> as there is no source/receptor. It can therefore be concluded that it can be <u>excluded from further</u> consideration in stages 4-7

3.0 Conclusion

It can be concluded based on the completion of assessing stages 1-3 in this report that a baseline report is not warranted due to the quantities of hazardous substances used on site and the structures in place which eliminate the possibility of any contamination to soil or groundwater from occurring.

David Wynne (B.Sc. Env.Sc) **Environmental Consultant**

NRGE Ltd

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