

Environmental Licensign Programme
Office of Environmental Sustainability,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford

9th April 2021

**Re: Mr. Eoin O'Brien
Licence Application P0790-03**

Dear Sir/Madame,

I refer to previous Agency correspondence of 31/03/2020 in relation to the aforementioned Licence applicant.

- 1. It is noted that the documentation regarding BAT (Best Available Techniques) has not been fully completed. a) Provide clarifications on the BAT conclusions for BAT 30 from the CID document for the Intensive Rearing of Poultry or Pigs ((EU) 2017/302, February 2017) clearly identifying the specific techniques that will be used; and**

The following BAT technique is proposed on the farm (frequent removal to external storage tanks)

BAT 30. In order to reduce ammonia emissions to air from each pig house, BAT is to use one or a combination of the techniques given below.

Technique ⁽²⁸⁾	Animal category	Applicability
a) One of the following techniques, which apply one or a combination of the following principles: (i) reduce the ammonia emitting surface; (ii) increase the frequency of slurry (manure) removal to external storage; (iii) separate urine from faeces; (iv) keep litter clean and dry..		
1.A vacuum system for frequent slurry removal (in case of a fully or partly slatted floor).	All pigs	May not be generally applicable to existing plants due to technical and/or economic considerations.

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. 2. Submit the following details for manure/slurry storage onsite.

Please refer to enclosed conclusion on Energy and Storage.

2. a) For slurry storage onsite include information on; the type of storage (e.g. slurry - circular store) and its associated details (e.g. rigid cover/no cover); underground or over ground, manure capacity in tonnes; and area of storage (m²);

b) The location of the slurry storage tank(s) with grid references and shown on a suitably scaled map; and c) Details of the bunding arrangements in place for the tank(s).

Please refer to Section 19A of the enclosed EIA Addendum.

3. In relation to the proposed storm water collection system, clarifications are required: a) Provide the grid reference(s) of proposed storm water monitoring point(s) to monitor ALL storm water lines discharging through SW1; and b) Show the location(s) on a suitably scaled map.

Please refer to Section 19A of the enclosed EIA Addendum.

4. The section on Prevention of Accidents is missing from your application. Provide comprehensive details of the measures that will be in place for the prevention of accidents at the site.

Please refer to enclosed Updated Accident Prevention Procedure.

5. Provide an updated letter from the contractor who will remove the organic fertiliser from the proposed installation confirming their agreement with the applicant.

This letter should include the following:

a) The contractor's DAFM registration details;

b) The use of the organic fertiliser;

c) The quantity of organic fertiliser to be removed from the installation by the contractor per annum;

- d) Assurance that the transport of organic fertiliser will be in accordance with the Animal By-product Regulations; and
- e) Assurance that the Record 3 forms will be maintained onsite (as required under Article 23 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, as amended.

All organic fertiliser will be transported by/or on behalf of the customer farmers for use as an organic fertiliser in accordance with the requirements of S.I. 605 of 2017. All record 3 forms will be maintained as required.

- 6. 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 year 2019.

Please refer to enclosed 2020 Record 3 Summary.

- 7. For the purposes of a SCAIL assessment of the impact of the installation on European sites, provide the increase in number of the following types of pigs to be housed on the proposed site; a) Sows; b) Farrowers; c) Weaners; d) Growers; e) Finishers; and f) Boars.

Please refer to enclosed Ammonia Impact Assessment and revised Natura Impact Statement

- 8. Update the Environmental Impact Statement (EIS), in accordance with the requirements of the 2011 Environmental Impact Assessment Directive, as amended, regarding the following: a) Water drainage from the site, in particular address drainage from yard areas; b) Climate; c) Interaction of effects; and d) Where appropriate, provide an updated non-technical summary, reflecting all the information required under Annex IV of the EIA Directive, 2011.

Please refer to enclosed EIA Addendum.

- 9. Provide an assessment of the impact of odour emissions from the proposed development 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.

Please refer to enclosed Odour Impact Assessment.

The logo for CLW Environmental Planners Ltd. features a stylized graphic on the left consisting of overlapping squares in shades of blue and green, intersected by a vertical black line. To the right of this graphic is a solid black horizontal bar containing the company name in white serif font.

CLW Environmental Planners Ltd.

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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.

No revisions are required to the License Application form.

Yours Sincerely,

Paraic Fay

Paraic Fay B.Agr.Sc.

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