



## ENVIRONMENTAL SOLUTIONS LTD

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14<sup>th</sup> May 2021

Environmental Protection Agency,  
Johnstown Castle Estate  
County Wexford  
Y35 W821.

**Licensee Name:** Woodville Pig Farms Ltd  
**EPA Licence No:** P0467  
**Application Reference No:** LA004791

**RE:** RFI Reg.10(2)(b)(ii) or Art14(2)(b)(ii).

Dear Sir/Madam

Panther Environmental Solutions Ltd, acting as consultants for Woodville Pig Farms Ltd, provide the following response to further information requested by the EPA on 14<sup>th</sup> October 2020.

In addition to this letter, please find attached:

- 100521 Woodville Farm Piggery Odour Impact Assessment Ver 2
- BAT Conclusions \_Woodville Farm \_14-05-2021
- Natura Impact Statement \_Tim Cullinan \_9926
- LA004791 \_EIAR Non Technical Summary
- LA004791 \_Attachment 1.2\_Non-Tech-Summary

Yours faithfully,

Martin O'Looney  
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**RFI Reg.10(2)(b)(ii) Response Letter**  
Woodville Pig Farms Ltd (Application Ref: LA004791)

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.

**All development relating to planning permissions prior to 2020 are complete and operational at the site.**

**Work (including demolition works) approved under planning ref: 20-211, approved on 11/06/2020) have not been commenced, aside from initial site clearance works.**

**The applicant is eager to progress with this development. However, construction will not commence until the applicant receives an indication that the EPA is favourable to this proposal and the proposed buildings can be stocked once complete. It is anticipated that construction would take 6-12 months to complete following approval (depending on the time of the year).**

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.

**The following table is amended from Table 2.2 of the EIAR.**

**Table 2.1: Current and Proposed Maximum Pig Numbers at the Woodville Site.**

<b>Animal Class</b>	<b>Existing EPA License No. of Pigs</b> (Note 1,2)	<b>Proposed No of Pigs</b>
<b>Woodville</b>		
<b>Dry Sows / Farrows / Suckling Sows</b>	<b>920</b>	<b>1,650</b>
<b>Weaners</b>	<b>3,850</b>	<b>8,400</b>
<b>Fattening pigs</b>	<b>----</b>	<b>4,200</b> (Note 3)
<b>Ballyknockane</b>		
<b>Fattening pigs</b>	<b>8,000</b>	<b>8,000</b>

Note 1: This excludes suckling pigs maintained on site.

Note 2: A 20% increase in the number of production pigs (finishers) held on site, for a period not exceeding 2 weeks, is permissible. The frequency of such occurrences must be kept to a minimum. Any other variation in any of the animals numbers specified requires prior agreement from the Agency.

Note 3: BAT-CID defines Fattening pigs as “Production pigs typically reared from a live weight of 30 kg to slaughter or first service. This category includes growers, finishers and gilts that have not been serviced”. The “Pre-finisher Building” is intended to bring under-weight weaners up to approximately 30kg prior to being moved to Ballyknockane, which would be a fattening activity (rather than weaning activity).

3. What is the predicted future electricity usage of the expanded site?

**The existing annual usage of electricity was 629,980 kWh in 2020 and it is expected that this will be 1,130,400 kWh if the proposed development is allowed proceed. This is based upon a pro-rata increase based on proposed pig numbers.**

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4. The given calculation of slurry production for the Woodville site does not include weaners. Provide a recalculated figure to include all stock onsite.

The following table provides 2020 slurry volumes generated at the Woodville and Ballyknockane farms. As weaner numbers are related to sow production numbers, it is considered that a pro-rata increase in sow numbers will provide a good estimate of anticipated slurry volumes, including sows and weaners. Finisher pigs at both sites have also been included.

**Table 4.1: Current Slurry Production**

	Number of Stock	2020 Slurry Production (m <sup>3</sup> / week)	26 week Volume (m <sup>3</sup> )	Annual (52 week) Volume (m <sup>3</sup> )
<b>Woodville</b>				
<b>Sow Unit (comprising sows and weaners)</b>	<b>920</b>	<b>91</b>	<b>2,366</b>	<b>4,732</b>
<b>Ballyknockane</b>				
<b>Finisher Pigs</b>	<b>8,000</b>	<b>192</b>	<b>4,992</b>	<b>9,984</b>
<b>TOTAL (m<sup>3</sup>)</b>			<b>7,358</b>	<b>14,716</b>

**Table 4.2: Future Slurry Production**

	Number of Stock	2020 Slurry Production (m <sup>3</sup> / week)	26 week Volume (m <sup>3</sup> )	Annual (52 week) Volume (m <sup>3</sup> )
<b>Woodville</b>				
<b>Sow Unit (comprising sows and weaners)</b>	<b>1,650</b>	<b>163</b>	<b>4,238</b>	<b>8,476</b>
<b>Finisher Pigs</b>	<b>4,200</b>	<b>100.8</b>	<b>2,621</b>	<b>5,242</b>
<b>Ballyknockane</b>				
<b>Finisher Pigs</b>	<b>8,000</b>	<b>192</b>	<b>4,992</b>	<b>9,984</b>
<b>TOTAL (m<sup>3</sup>)</b>			<b>11,851</b>	<b>23,702</b>

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.

**Feed storage facilities for all customers are located within the boundary of Tipperary Milling Company Limited. The point of supply to Woodville Pig Farms Ltd would be the conveyors supplying the farm-houses.**

**There is no current or proposed feed storage within the Woodville farm boundary.**

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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.

**An Odour Impact Assessment Report (Report Reference: 20211003(1)) has been completed by Odour Monitoring Ireland Ltd and has been included with this submission.**

**This report has been included as part of this submission.**

**The proposed expansion of the activity at the Woodville farm alone has been modelled. There would be no development or alteration of current pig numbers at the Ballyknockane farm as a result of the proposed development. There has been one odour complaint at the Ballyknockane farm since taken over by the applicant in 2001 (20 years) and no further odour complaints since 2014 (7 years).**

**The model assessed the potential impacts for the farm as standard slatted type animal houses. Potential ammonia reductions as a result of proposed slurry removal and slurry cooling systems were not accounted for in the model.**

**Modelling has determined that the proposed development would generate odours of less than the guideline odour limit value in the worst case scenario year. Therefore, odour mitigation has not been deemed to be necessary for this site.**

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.

**A map showing the location of first-party and third-party residences is provided in Appendix A below. The residences bordering the farm are owned either by Woodville Pig Farms Ltd or privately by the applicant. The closest third-party residence is approximately 300m west of the closest site boundary.**

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.

**Stormwater from roofs and clean yards would discharge through the surface water collection network. This water should be uncontaminated and therefore should have no impact on surface or groundwater.**

**There is currently an inspection chamber at the EPA licence monitoring point (SW2) on the storm water discharge from the facility. There is currently no plan to install silt traps, swales or interceptors on the storm line.**

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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.

**A BAT assessment has been carried out for the Woodville and Ballyknockane farms for the following documents:**

- **Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017),**
- **Reference Document on Best Available Techniques for Energy Efficiency, February 2009,**
- **Reference Document on Best Available Techniques on Emissions from Storage, July 2006.**

**This document has been included as part of this submission.**

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10. A screening for Appropriate Assessment was undertaken on 23<sup>rd</sup> 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](http://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf).

**A revised Appropriate Assessment / Natura Impact Statement (NIS) (Report Reference: PES\_NIS\_9926) has been prepared based upon an Air Quality Modelling Report (Report Reference: 20211003(1)) by Odour Monitoring Ireland Ltd.**

**The revised NIS report have been included as part of this submission.**

- b. Please note that a screening tool ‘Simple Calculation of Atmospheric Impact Limits’ (SCAIL) is available at: <http://www.scail.cen.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 (m<sup>3</sup>/s); housing floor area (m<sup>2</sup>), 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 (m<sup>2</sup>).

**Appendix B contains house details as described above.**

**The majority of slurry storage at the site would be underfloor slatted tanks. Details of the proposed open-topped slurry reception tank have been provided in Appendix B.**

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.

**Revised Non-Technical Summaries for the License Application and EIAR have been included in this submission.**

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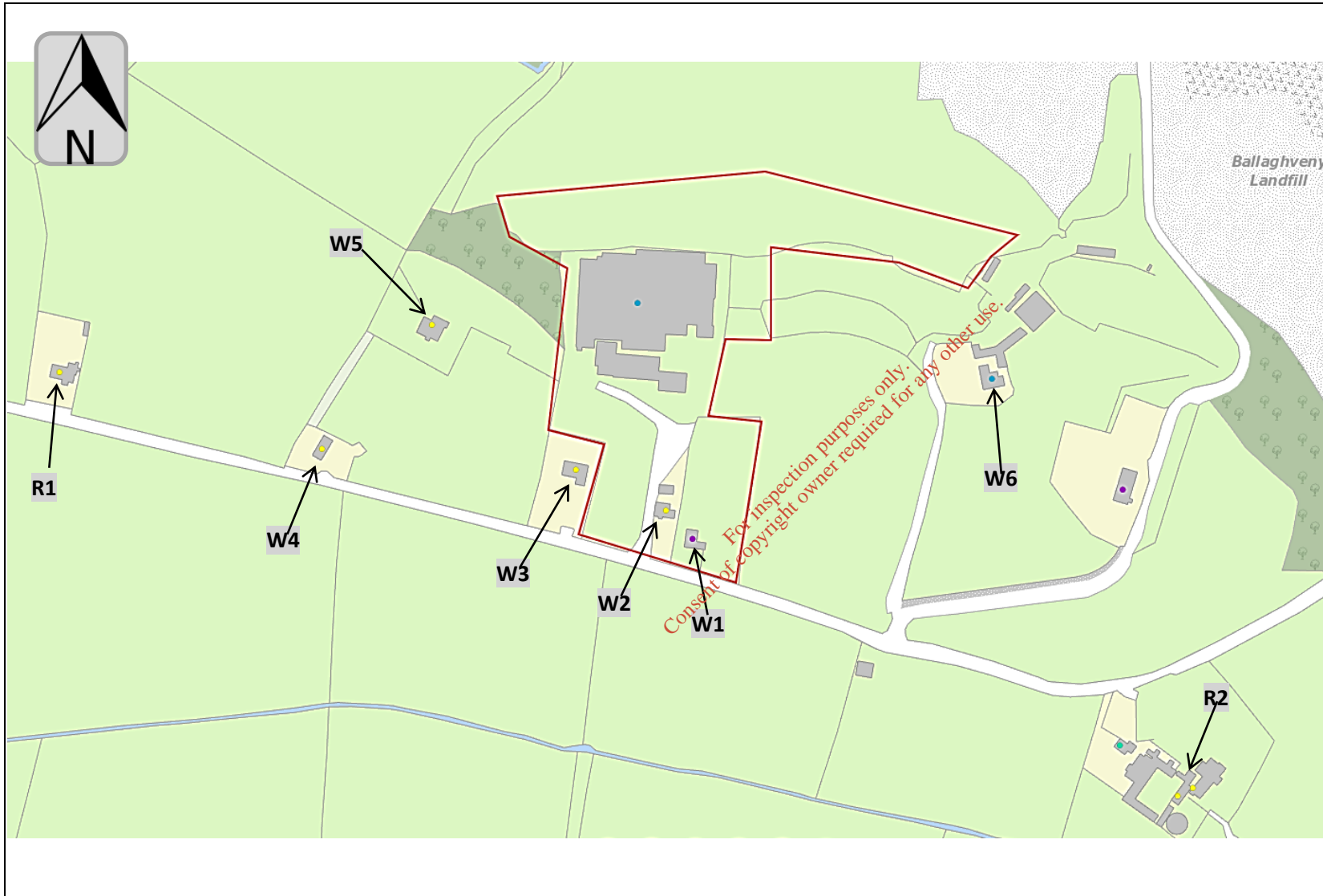
**APPENDIX A**  
**- RESIDENTIAL MAP -**

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**RFI Reg.10(2)(b)(ii) Response Letter**  
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Notes	
W#	First Party Residential Buildings (i.e. owned by Woodville Farm or the applicant) (W1 is converted to farm office) (W6 is a derelict historical building)
<b>Distance from boundary:</b>	
R1	Third Party Residence @c.300m
R2	Third Party Residence @c.350m

Project Title:
<b>RESIDENTIAL LOCATIONS</b>
Client Name:

**WOODVILLE PIG  
 FARMS LTD,  
 BALLYMACKEY,  
 CO. TIPPERARY**

  
**PANTHER**  
**ENVIRONMENTAL  
 SOLUTIONS LTD**

UNITS 3 & 4  
 INNOVATION CENTRE  
 GREEN ROAD  
 CARLOW  
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Revision:	Checked:	MF	
R1	Approved:	Date:	
		12/04/2021	

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**APPENDIX B**  
**- SCAIL MODEL DATA -**

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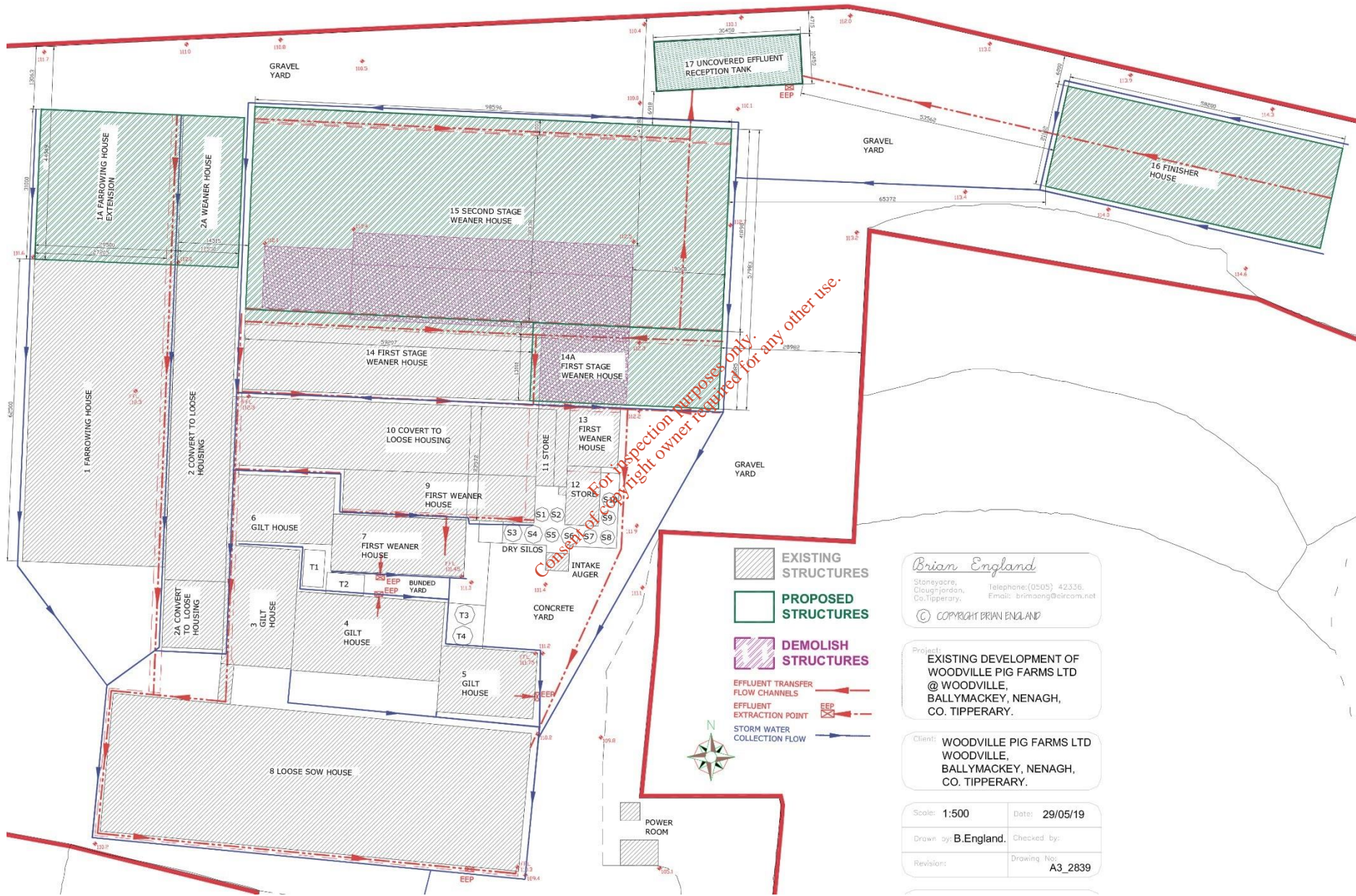
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Woodville Pig Farms – SCAIL Model Details

	House Ref	Length (m)	Width (m)	Area (m2)	Tank Height (m)	Max Height (m)	Floor	Ventilation	No. Fans	Fan Diameter (m)	Flow Rate (m3/s)	No. Pigs	Type
Farrowing House	1	162.50	27.20	4420.00		6.4	Slatted	Mechanical	10	0.6	3.72	220	Sows and piglets
Existing Farrowing House	2	65.10	12.55	817.01		4.5	Slatted	Mechanical	11	0.4	1.21	80	To be farrowing
Ex. Sow House	2A	14.00	12.55	175.70		4.5	Slatted	Mechanical	4	0.6	3.23	150	Loose sows
Gilt House	3	24.63	121.63	2995.75		4.4	Slatted	Mechanical	2	0.6	3.53	81	Gilts
Gilt House	4	30.66	16.30	499.76		4.4	Slatted	Mechanical	6	0.6	2.94	210	M Gilts/Prod. pigs
Gilt House	5	19.93	13.72	273.44		4.3	Slatted	Mechanical	3	0.6	2.94	300	M Gilts
Gilt House	6	19.92	13.80	274.90		4.4	Slatted	Mechanical	4	0.45	1.6	109	Gilts
First stage weaner	7	27.50	11.74	322.85		3.7	Slatted	Mechanical	4	0.6	2.94	900	Weaners
Loose Sow House	8	86.90	28.60	2485.34		6.4	Slatted	Mechanical	8	0.6	3.53	850	Loose sows
First Stage Weaner House	9	37.77	8.24	311.22		3.8	Slatted	Mechanical	2	0.45	1.78	900	Weaners
Loose Sow House	10	59.50	14.10	838.95		4.5	Slatted	Mechanical	4	0.6	3.53	250	Loose Sows
First Stage Weaner House	13	11.45	10.40	119.08		3.7	Slatted	Mechanical	2	0.4	1.8	400	Weaners
First Stage Weaner House	14	59.20	13.10	775.52		3.7	Slatted	Mechanical	2	0.6	3.72	900	Weaners
New Farrowing House	1A	31.00	27.20	843.20		6.5	Slatted	Mechanical	5	0.6	3.72	100	Sows and piglets
New Weaner House	2B	31.00	12.55	389.05		3.5	Slatted	Mechanical	5	0.6	3.72	950	Weaners
New Second Stage	15	98.60	57.90	5708.94		4.6	Slatted	Mechanical	20	0.6	3.72	5270	Weaners /Prod pigs
New Finisher House	16	58.20	21.20	1233.84		4.3	Slatted	Mechanical	12	0.6	2.78	1000	Finishers
New Slurry Reception tank	17	30.40	10.40	316.16	2.40	0	Open						

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Project: EXISTING DEVELOPMENT OF WOODVILLE PIG FARMS LTD @ WOODVILLE, BALLYMACKEY, NENAGH, CO. TIPPERARY.

Client: WOODVILLE PIG FARMS LTD WOODVILLE, BALLYMACKEY, NENAGH, CO. TIPPERARY.

Scale: 1:500	Date: 29/05/19
Drawn by B.England.	Checked by:
Revision:	Drawing No. A3_2839