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Mr. Paraic Fay

Mr. William Murphy

On behalf of Clondrisse Pig Farm Limited

24 May 2021

Reg. No.: P0975-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Clondrisse Pig Farm Limited for an installation located at Joristown Upper, Killucan, County Westmeath.

Dear Sirs,

I refer to the application for a licence received by the EPA on 11 June 2018 and to the Agency's requests for information issued on 05 December 2018, 12 December 2019 and 07 January 2021, and your response received on 31 March 2021.

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. The maximum number of production pigs to be housed at the installation is stated as 3,800 in section 4.4 "Capacity" of the application form. This differs to the number authorised by planning permission reference 11/2091, the Environmental Impact Statement (EIS) and its addendum (3,318). Confirm the capacity that the figures/calculations that have been provided in the application are based on. Provide updated figures/calculations based on the revised stocking rate authorised under your planning permission, if required. For example, revised figures/calculations may need to be submitted for resources used, wastes generated, organic fertiliser produced and storage facilities, emissions etc.
2. It is noted that a fee of €1,904 has been received for this licence review application. However, a capacity greater than 570 sows in an integrated unit is classified as a "large activity" and as such a fee of €6,983 applies. You are required to submit the outstanding fees.

3. As an EIAR was required and received by the Agency, you are required to erect a revised site notice, publish a revised newspaper notice and notify the planning authority in accordance with Regulations 4, 5, 6 and 8 of the EPA (Industrial Emissions) Licensing Regulations 2013, indicating that an EIAR was submitted with the licence application. A copy of the relevant notices must be submitted as per Regulation 9(4)(a), 9(4)(b) and 9(4)(c) of the Regulations.
4. Having regard to the site plan received as part of the application, it is noted that the nomenclature used in identifying the animal houses differs to that used in the Air Quality Impact Assessment Report and in the Ammonia Impact Assessment Report. Provide an updated site plan to include:
 - a) The full site boundary outlined in red;
 - b) All infrastructure located within the site boundary clearly identifiable with legible labels;
 - c) Labelling of all animal houses onsite, to include the same numbering/naming convention in line with those given in the Air Quality Impact Assessment and Ammonia Impact Assessment reports (e.g. animal house no. 1 etc.); and
 - d) Any further clarifications included in this request (outlined below) that impacts the site plan.

Should an IE licence be granted for this installation, the conditions contained within that licence will apply to all infrastructure identified within the site boundary.

5. Clarify the bunding and protections for the back-up generator on-site.
6. The EIAR states that *“Supplementary heating is to be provided by electric and/or hot water heating systems in the weaner and farrowing accommodation.”* Confirm the fuel type and estimated quantity to be used for the hot water heating system.
7. With regards to water usage onsite:
 - a) Clarify whether the onsite well is the only source of water for the site;
 - b) Confirm if a meter is in place as required under condition 3.6 of the existing licence; and
 - c) Provide records of water usage over the last 12-month period.
8. Update Attachment 9 of the application form in relation to Cessation of Activity to reflect the swine activities onsite.
9. Attachment 9 of the application form states there is no emergency response procedure onsite. However, Condition 9.2 of the existing licence required that *“The licensee shall, within six months of date of grant of this licence, ensure that a*

documented Emergency Response Procedure is in place". Provide clarification on the status of compliance with Condition 9.2.

10. Section 7.7 of the application form indicates that there will be two storm water discharge points. The site plan and existing licence suggest there will be three. Clarify the proposed number of storm water discharge points.
11. 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):
 - i. Clearly identify the **specific techniques** to be used for BAT 3, 4, 5, 6, 7, 8, 12, 13, 24, 25, and 27; and
 - ii. Bat 10 is applicable to this installation. Clearly identify the specific techniques to be used to comply with this BAT.
 - 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.
12. With regards to Organic Fertiliser:
 - a) The Record 3 submitted with the application states that the installation exported 9,100m³ of organic fertiliser in 2020 when operating as a 625-sow unit, but the application estimates only 8,112m³ organic fertiliser will be produced when operating as an integrated unit for 625 sows and 3,318 production pigs. Provide clarification on this;
 - b) Your application mentions frequent slurry removal as an abatement technique for ammonia. Any BAT techniques proposed onsite **must** be factored into capacity calculations; and
 - c) Update the Agri Environmental Report submitted with the application to account for the points above, a storage capacity of 26 weeks must be provided.
13. With regards to Odour Assessment and the Air Quality Impact Assessment Report received on 31 March 2021 as part of the application:
 - a) Provide an updated modelling report to demonstrate maximum worst case scenario emissions as set out below:
 - i. In relation to sow numbers, it is noted that modelling was undertaken on 369 sows; however, the application is for 625 sows (500 sows and 165

served gilts). Therefore, the modelling should have included the full sow capacity applied for (other pig type numbers appear correct);

- ii. Where the applicant wishes to utilise alternative emission factors to those in the Agency's guidance document (*Odour Impacts and Odour Emission Control Measures for Intensive Agriculture*, <http://www.epa.ie/pubs/reports/research/air/rd9499odourintensiveagriculture.html>)

these emission factors should be fully justified. Any amended emission factors can be justified in line with the various techniques outlined in the BREF document *Best Available Techniques (BAT) Reference Document for the Intensive Rearing of Poultry or Pigs, 2017*.

Frequent slurry removal is not listed as an odour reduction technique in BAT. The BREF documents notes frequent slurry removal "*can generate odour peaks at the time of emptying the slurry pits*". In the event this odour emission reduction technique cannot be supported with literature-referenced evidence, it will be necessary to re-run the odour model without the 25% reduction.

In addition, an alternative odour reduction technique (as required by BAT) will need to be proposed; and

- iii. The ground level odour concentration contour map provided in the report only displays to an odour unit of 5ou/m³. This should display contours down to an odour unit of 1ou/m³. In addition, the contour map should display the site boundary. Provide an updated contour map; and
- b) Provide a copy of the odour management programme required under condition 5.7 of the existing licence.

14. With regards to Appropriate Assessment, and the revised Natura Impact Statement (NIS) and the Ammonia Impact Assessment Report received 31 March 2021, the Agency is of the opinion that insufficient evidence has been provided to demonstrate that there will be no significant effects on European sites due to ammonia emissions from the installation, either individually or in combination with other plans or projects:

- a) There appears to be a discrepancy in the number of production pigs applied for throughout the application as per point 1. above. The Ammonia Impact Assessment Report refers to a capacity of 3,338 production pigs in the four 'proposed' houses. However, it is noted that the planning permissions granted for the installation refer to a capacity of 3,318 production pigs. Clarify the number of production pigs being applied for in the licence review application and update the Ammonia Impact Assessment Report and NIS accordingly;
- b) The existing licence includes a condition in relation to low protein feeds (condition 5.8). Therefore, the animals in the 'existing' houses should already be on low protein diets. Whilst it is noted that there may be further reductions of ammonia from the existing houses due to the incorporation of low protein feeds at 16.5% crude protein, it is not appropriate to incorporate this full reduction

into the modelling of the existing houses. The full number of production pigs should be included in the modelling. Updated the site-specific modelling accordingly;

- c) It is further noted that the modelling includes a 25% reduction in ammonia emissions through the use of frequent slurry removal from the additional animal houses. However, no evidence has been provided to justify that the technique proposed meets the criteria as described in the BREF for the frequent removal of slurry to external storage through the use of a vacuum system i.e. the frequency of slurry removal, removal via a vacuum system, location of external store etc. Therefore, this 25% reduction should not be included in the modelling, unless evidence is provided that the technique as described in the BREF document can be met. The CID and associated BREF should be referred to in relation to this. Provide evidence that this 25% reduction in ammonia emissions is appropriate;
- d) Background data in the SCAIL model for the Republic of Ireland is from 2013 for ammonia and from 2009 for nitrogen deposition:
 - i. In relation to assigning the full existing activity to the background, the existing licence was issued in 2017, therefore, the activity should have been operating at sub-threshold levels prior to receiving a licence from the EPA; and
 - ii. In relation to cumulative assessment provided, there are several licensed installations within close proximity of the installation. It is not appropriate to assign the full emissions from these installations to background levels, as they should not have been operating above the licensing thresholds prior to receiving a licence from the EPA. A revised in-combination assessment is required (include the increase in numbers for licensed and unlicensed sites since background data was last determined);
- e) In addition, there appears to be errors / omissions in the modelling submitted:
 - i. Clarify how the manufacturer's specification for the fans proposed support the flux velocity used in the model and where appropriate update the table and/or modelling appropriately;
 - ii. Provide a justification for the efflux temperature quoted. Maximum emissions must be modelled;
 - iii. Identify the animal houses used in the modelling in line with the updated site plan requested under point 4. above; and
 - iv. The contour map provided in Appendix D of the report with ground level ammonia concentrations does not display the site boundary. This is required to visually assess the impact of emissions at such locations. Update the contour map accordingly;
- f) Provide an updated version of the Ammonia Impact Assessment Report to address the following as a minimum:
 - i. Reference to the Air Dispersion Modelling from Industrial Installations Guidance Note (AG4) regarding the format and content of the assessment report; and

- ii. Inclusion of amended information and updated modelling as required by points (a - f) above; and
- g) Provide an updated NIS to reflect the amended Ammonia Impact Assessment Report required under Point number (f) above.

All BAT/mitigation proposed and the overall implications of their application must be factored into all your responses to this request for further information.

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 *eight 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,

Linda Cahill

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