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Mr. Martin O'Looney
Mr. Tim Cullinane
On behalf of Woodville Pig Farms Limited

17th June 2021

Reg. No.: P0467-03

Reminder in relation to the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Woodville Pig Farms Limited for an installation located at Ballymackey, Nenagh, County Tipperary.

Dear Mr. O'Looney,

I refer to your response of 14th May 2021, to a request by the Agency for information in respect of your licence application. 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. It is noted that the documentation regarding the BAT (Best Available Techniques) conclusions from the Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017) has not been adequately completed.
 - a. Provide clarifications on how BAT 30 will be implemented in the new and proposed pig buildings:
 - i. Note that points a(i) and a(ii) are **not** BAT, they are the broad principles applied in the techniques listed thereafter.
 - ii. Use of BAT 30(a.1), a vacuum system for frequent slurry removal (in case of a fully or partly slatted floor), implies removal of slurry of up to twice a week. Supply information to demonstrate that adequate external covered storage capacity is available **on-site** to allow for implementation of this BAT technique. Information on the description and requirements of all BAT techniques can be found in the associated BREF document. Clarify how BAT 30 will be implemented onsite.

- iii. State definitively how the applicant proposes to meet the requirements for BAT 30 in the proposed new pig buildings. Note that for slurry cooling to be BAT-compliant, it is necessary to incorporate heat recovery and reuse. Confirm the technique to be applied and supply details on how this will be achieved.
 - b. Implementation of BAT 16 requires “**a combination of techniques**” to be implemented: BAT 16(a) alone is insufficient. It is noted also, that given the very low volume of external storage available, that BAT 16(a.2) is unlikely to be achievable for this slurry store based on the information supplied.
2. The requested 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.
3. With respect to the odour and ammonia modelling assessments submitted:
 - a. The odour emission factor used for production pigs (10 ou_E/s) is not acceptable and has not been justified. The EPA’s guidance document, *Odour Impacts and Odour Emission Control: Measures for Intensive Agriculture* (2001), recommends an emission factor for production pigs (fatteners) of 22.5 ou_E/s.
 - b. The ammonia emission factor used for production pigs reflects only the grower stage and not the finisher stage. Given the increase in sow, weaner, and grower numbers, there will be a corresponding increase in the quantity of finishers, either at the Woodville breeding unit or the Ballyknockane finishing unit. If the increased number of finishers is to be disproportionately concentrated at the Ballyknockane finishing unit, then the associated increase in ammonia and odour emissions from that site must also be assessed.
 - c. The numbers of each class of animal, particularly production pigs, used in the odour and ammonia models differs significantly from the numbers given in the licence application.
 - d. Both the odour and ammonia modelling have neglected to include emissions from external slurry storage.
 - e. Re-run the models addressing points a to c.
 - f. Update the Natura Impact Statement to reflect the corrected model results.
4. Does the figure of 4,200 fattening pigs given in the licence application include maiden gilts? What is the proposed total number of maiden gilts to be kept on-site? Note that served gilts are considered sows as per Danish ECJ judgement case C-585/10.

5. The EIAR makes reference to a septic tank onsite. Confirm if there is a septic tank onsite and update the site plan to show its location.

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. Your prompt attention to this matter is therefore requested.

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.

Please direct any queries to licensing@epa.ie.

Yours faithfully,



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