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17th September 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 Reminder, dated 20th August 2021.

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 17th June 2021.

In addition to this letter, please find attached:

• A3_3146_EIA SITE LAYOUT PLAN WOODVILLE PIG FARMS WOODVILLE SITE,

Yours faithfully,

Martin O'Looney

Panther Environmental Solutions Ltd

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RFI Response Letter

Woodville Pig Farms Ltd (Application Ref: LA004791)

- 1. You have not addressed points 3.c and 3.d of our previous communication with respect to the odour and ammonia modelling assessments submitted:
 - a. The numbers of each class of animal, particularly production pigs, used in the odour and ammonia models differs from that proposed in the licence application. The licence review application proposed 4,200 production pig, however the odour and ammonia emissions of only 1,700 production pigs have been modelled. The number of weaners modelled also differs from that proposed in the licence review application.
 - b. Ammonia and odour emissions from external slurry storage have not been included in the model.
 - c. Re-run the models addressing points 1.a and 1.b and resubmit a complete report, with reference to the Air Dispersion Modelling from Industrial Installations Guidance Note (AG4) regarding its format and content. Update the NIS or other documents as necessary.

The error in the number of production pigs and weapers modelled was due to a misallocation of pig types within each building and an error in the number of weaners. The pig numbers and emissions rates have been corrected and are summarised in the table in Appendix A of this letter.

Due to previous commitments, Odour Montoring Ireland is not available to complete a revised odour and ammonia model until October. Once the revised model is complete, this will be submitted to the EPA as further information.

If required, any ancillary documents which need to be updated (e.g. NIS, Application Non-Technical Summary and FIAR Non-Technical Summary) will be updated and submitted along with the revised model report.

- 2. It is noted that the proposed construction of two external slurry tanks to achieve compliance with BAT 30 for the proposed new buildings, does not currently have a grant of planning permission from the planning authority, nor is there an application for planning permission under consideration by the planning authority or An Bord Pleanála. Under Section 87(1B) of the Environmental Protection Act 1992, the Agency cannot consider an application for IE licence where there is neither a grant of planning permission nor an application for planning permission currently under consideration comprising or for the purposes of the full activity at the site to which the application for a licence relates. The applicant must therefore consider the following options:
 - a. Withdrawing the application for an IE licence until such point that a planning application is under consideration by the planning authority; or
 - b. Proposing an alternative means of achieving compliance with BAT 30 for the proposed, new buildings, which does not require a grant of planning permission.

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A planning application has been made to the Mayo Planning Authority on 15th September 2021.

The planning file reference number for this application is 211371.

3. What is the quantity of animal feed to be used on site annually?

The current annual feed used on the Woodville site is 2,700 tonnes of feed (1,250 tonnes of sow feed and 1,450 tonnes for the weaned pigs).

The Ballyknockane site currently uses c.9,100 tonnes of finisher feed each year.

The proposed Annual feed usage on the Woodville site will be 9,200 tonnes (2,250 tonnes of sow feed,3,100 tonnes of feed for the weaners and 3,830 tonnes of grower/finisher feed).

The Ballyknockane site will continue to use c.9,100 tonnes of finisher feed each year.

4. All infrastructure necessary for the operation of the ficensable activity must be located within the licensed site boundary. If necessary, propose a new site boundary to accommodate the proposed external slurry stores. Update the site plan accordingly.

Please find attached a including a revise proposed site boundary for the proposed slurry storage tank. The drawing is titled of price A3_3146_EIA SITE LAYOUT PLAN WOODVILLE PIG FARMS WOODVILLE SITE,

5. Please note that water abstractions exceeding 25 m3 (25,000 litres) per day are required to be registered with the Agency, in accordance with the European Union (Abstractions Registration) Regulations 2018. Details on the registering of a water abstraction can be found on the Agency website at the following link: https://www.epa.ie/our-services/licensing/freshwater--marine/water-abstraction/.

The abstractions at Woodville and Ballyknockane Farms will be registered by 01st October 2021.

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Appendix A – Corrected Pig numbers and building assignments

Farm House Number	Pig Numbers	Type of Pig Unit	Odour emission rate per pig place (OuE/pig/s)	NH3 emission rate per pig place (µg/pig/s)	Weaners	Dry Sows	Lactating Sows	Gilts	Production Pigs - over 30kgLW
1	220	Sows and Piglets	19	185.2			220		
2	80	To be farrowing	20	185.2			80		
2A	150	Loose Sows	19	185.2		150			
3	81	Gilt	20	185.2				81	
4	210	Maiden Gilts / Production Pigs	20 / 22.5	185.2 / 131.3	nze.			30	180
5	300	Maiden Gilts	20 / 22.5	185.2 / 131,3					<mark>300</mark>
6	109	Gilts	20	185,20				109	
7	900	Weaners	6	our Q. 2	900				
8	850	Loose Sows	19	gion et 185.2		850			
9	900	Weaners	6 .	9.2	900				
10	250	Loose sow	19 ¢°	95.4		250			
13	400	Weaners	6 & cox	9.2	400				
14	900	Weaners	6 nisent	9.2	900				
1A	100	Sow	6 agent	185.2			100		
2B	950	Weaners	6	9.2	950				
15	7070	Prod Pigs	6 / 22.5	9.2 / 131.3	4350				2720
16	1000	Prod Pigs	22.5	131.3					1000
			TOTAL		8400	1250	400	220	4200
			Expected		8400	1250	400		4200