

30th November 2021

Mr Eoin McCaffery
Environmental Protection Agency,
Environmental Licensing Programme,
Office of Environmental Sustainability,
PO Box 3000,
Johnstown Castle Estate,
Wexford.

MOR Ref: E1835

Via EDEN

Re: P1069-01 IE Licence Application, William Connolly & Sons Unlimited Company (Red Mills)

Dear Eoin,

Malone O'Regan Environmental (MOR) was appointed by William Connolly & Sons, herein referred to as 'Red Mills' in May 2021 to support Red Mills in preparing a response to a request for further information, that was issued by the Environmental Protection Agency (the Agency) on the 20th November 2018 in regards to the Red Mills application for an Industrial Emissions Licence (IEL) Reg. No. P1069-01.

We refer to the online meeting that was held on the 8th July 2021 between representatives of the Agency, Red Mills and MOR where reasons for the delay in submitting a response to the Agency's request were explained and an extension to the November 30th 2021 was agreed. This extension was primarily agreed in order to allow MOR to compile the necessary baseline information during the 2021 harvest season to ensure a comprehensive response would be provided to the queries raised by the Agency. On behalf of our client, we wish to put on the record our appreciation for the Agency granting this additional time period.

The documents listed below were determined following our online meeting with the Agency on the 8th July 2021 and the subsequent programme of works submitted to the Agency on the 12th July 2021. The documents that we have included with this comprehensive response include the following:

- Non-Technical Summary;
- Air Dispersion Report;
- Noise Impact Assessment;
- Natura Impact Assessment; and
- IE Consulting ICW System Report.

In addition, the following Attachments are also included:

- Attachment 6-1 Stakeholder Engagement;
- Attachment 7-1 Emissions Overview;
- Attachment 7-5 Noise Emissions;
- Attachment 7-4-1 Emissions to Air Main; and
- Attachment 7-7 Storm Water Discharges.

Associated maps/drawings are also included with this submission, please refer to 'Drawings'.

In respect to the items requested as part of the Agency's RFI, please refer to Table 1 below for a summary referencing the location of the responses that contain the relevant information.

Table 1: RFI Items 20th November 2018

Item No. / Description	Information Response
Item 1: 17/641 Planners Report	Refer to Client's response dated 30/10/2019.
Item 2: Red Line Boundary	Refer to Section 1.2 of the NTS and Drawing 1 showing revised red line boundary accompanying this submission.
Item 3: Animal Raw Materials	Refer to Section 1.3 Class of Activities of the NTS.
Item 4: Operational Hours	Refer to Section 1.5 of the NTS.
Item 5: Complete Table G.1	Refer to Client's response dated 30/10/2019.
Item 6: Air Emissions	Refer to Section 4.1 of the NTS, Air report and air emission points attachment.
Item 7: Emission to Water and Storm Water Discharges	Refer to Section 3.4, Section 4.3 of the NTS, IE Consulting Report, storm water emissions attachment and Drawing 2 accompanying this submission. Please also refer to Client's response dated 30/10/2019.
Item 8: Constructed Wetland	Refer to Section 3.5 of the NTS, attached IE Consulting Report, storm water emissions attachment and Drawing 2 accompanying this submission.
Item 9: Any Wastes or Residues	Refer to Section 3.4 of the NTS.
Item 10: Diesel Tank	Refer to Section 1.6 of the NTS. Please also refer to Client's response dated 30/10/2019.
Item 11: Baseline Reports	Refer to Noise and Air reports accompanying this submission.
Item 12: Noise Emissions	Refer to the Noise and Air Reports accompanying this submission.
NIS	Refer to NIS accompanying this submission.
Updated NTS	The information provided in the attached documents, supersede the previous applicable material submitted to the EPA by Red Mills between March 2018 and May 2021.

We wish to confirm that the information provided in the above documents, supersedes the previous relevant application documents submitted to the Agency by Red Mills. Items of the original application that have not been superseded by MOR remain valid. We wish to note that an updated red line boundary for the licensed facility has now been proposed. We accept that this is a revision to the original application, but we consider that it is in the interests of all parties that the final licence issued by the Agency will accurately reflect site conditions that will exist by the time a final licence is in place, thereby negating the need for immediate technical amendments of the licence.

In evaluating this additional information, we would respectfully request that the Agency takes into account that the Red Mills site has been the home of the Connolly family business since 1908 in Grange Lower, Goresbridge, Co. Kilkenny (the Site). The processing of cereals for animal consumption began in 1963 and today Red Mills products are sold in over 40 countries worldwide and employ over 350 people. It is therefore a major employer in the region.

All elements of the facility will fall under the remit of the IE licence and operations occur all year around. It is important however that there is an appreciation in reviewing the attached data for the seasonality of the Red Mills operations, as the business comprises of two distinct elements, namely:

1. Non-harvest season, (approx.10 months - September -June); and
2. Harvest season (approx. 2 months - July – August).

Red Mills is located in one of the prime arable areas of the country. Tillage farmers in the area depend on having secure outlets for their produce. Each year crop yield and grain quality are dictated by numerous variables throughout the growing season such as weather conditions, temperature, rainfall, soil conditions, sunshine, etc. Good crop husbandry demands the rotation of crops each year for better yield as continuous cropping results in poorer nutrient uptake and

higher disease/pest challenges. Therefore, no two years are the same with regards to tonnage of grain intake. This year the grain harvest was the best in over 50 years, hence the emissions data compiled by MOR during the 2021 harvest season that will underpin the licence application will be based on a very much worst-case scenario. The uncertainty during this 6 – 8 week period each year presents a lot of challenges for the business, future compliance with an IE licence during this period will present new challenges for the facility that they will embrace.

The intake, drying and handling of the grain harvest is an integral part of providing essential ingredients to a number of industries. Food, feed and beverage industries depend on having a secure supply of suitably dried grain for their production processes and products. Specialised intake and drying procedures are required for the 1st generation seed crop, so that seed is available to plant for food/feed/beverage industries the following year.

Red Mills during the peak of the harvest, depending on weather conditions and the ripening of grains can receive large amounts of grain over a 10-15 day period, which requires rapid drying to ensure that the grain does not deteriorate by developing mould growth (including generation of mycotoxins), sprouting, heating, decomposition etc. If the grain deteriorates it can become unsuitable for its intended use and therefore becomes a waste.

The upgrade works, replacement dryers and providing new grain stores will be integral to ensuring that waste grain will be avoided, and that the grain onsite remains as fresh as possible to ensure the sustained production of high quality Red Mills products to a wide variety of customers.

Seasonal impacts also arise with the other side of business namely the feedmill business, as there is a major drop off in the demand for manufactured feed when the cows go out to grass in May each year. We trust that any future licence will allow for some flexibility to reflect this seasonality in site operations.

As part of the technical documents submitted, we wish to advise that we have accounted for some replacement dryers that did not form part of the 2018 application but are programmed to be in place by the 2022 harvest season. All of these replacement dryers will meet BAT requirements and will greatly reduce the time required to dry the grain during the next harvest season with all the associated environmental benefits such as reduced truck movements. We respectfully request that all of these replacement dryers be included in the proposed licence determination or at the very least be required by condition in the proposed determination.

Red Mill personnel have over recent months gained a much more better understanding of the responsibilities that will arise as a result of needing to operate in compliance with an IE licence. MOR can testify first hand to the significant environmental improvements that have been made at the facility in recent months. In addition to committing a significant investment to compile accurate baseline data to support the licence application, the management at the facility are also committed to making significant investments over the coming years to ensure operations at the facility will meet the Agency's requirements. We trust that these actions will restore the Agency's confidence in Red Mills and will lead to an improved working relationship over the coming months.

We trust the information submitted will satisfactorily inform the Agency with regards to the Red Mills IEL application. We do appreciate that this is a complex site and therefore, should the Agency consider that it would be of benefit, we would be happy to meet with relevant Agency personnel to clarify any further queries on the technical documents submitted.

Should you have any queries, then please do not hesitate to contact me.

Yours sincerely,

for Malone O'Regan



Kevin O'Regan