

31st March 2022.

**Ms. Pamela McDonnell,
Programme Manager,
Environmental Licencing Programme,
Office of Environmental Sustainability,
Johnstown Castle Estate,
Co. Wexford,
Y35 W821**

By EDEN

Re: Response to Further Notice under the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from William Connolly & Sons Unlimited Company for an installation located at William Connolly & Sons Unlimited Company, Grange Lower, Goresbridge, Kilkenny, R95 EKH4, dated 24th January 2022 - IE Licence Reg No. P1069-01

Dear Ms. McDonnell,

Please find attached Connolly's Red Mills response to the requested items as per the EPA's notice dated 24th January 2022, in respect of a licence application Reg No. P1069-01 from William Connolly & Sons Unlimited Company (hereafter referred to as Red Mills), in accordance with the EPA (Industrial Emissions) (Licensing) Regulations 2013.

Since our correspondence dated the 31st January 2022, Red Mills have sought to complete the proposed next steps detailed in the Additional Information Report by our consultants Malone O'Regan Environmental (MOR) and items detailed in the Agency's letter dated 24th January 2022 in a systematic manner. All outstanding information (Items 2, 3, 4, 7, and 8) is provided in this letter and the attached documents. Responses to Items 1, 5, and 6 were previously provided in the MOR submission that was made to the EPA via EDEN dated 31st January 2022.

In addition, a revised Natura Impact Statement is also included in this submission, as it was updated with more detailed assessments of emissions to air impacts and noise impacts on the SAC.

Importantly, the revised Air Dispersion Model details proposed mitigation measures which would require a significant capital expenditure that we are fully committed to implementing. However, given the significant CapEx required, we would greatly appreciate the Agency's response and feedback in relation to these mitigation measures as soon as practicable. We trust that the Agency will appreciate that the actual implementation timeframe will depend on the supply chain, which is currently disrupted and unpredictable. Hence the reason we wish for the equipment to be sourced and ordered as soon as possible.

Response to Items 2 and 3

The Agency's letter dated 24th January 2022 requested the following information:

'2. A revised Air Dispersion Model demonstrating that all relevant emissions to air from the installation will comply with relevant Air Quality Standards.

'3. A revised Attachment 7.4.1 – Emissions to Air - Main and Fugitive.

Please refer to the following documents accompanying this submission:

- Emissions to Air Assessment; and
- Attachment 7.4.1 Emissions to Air – Main and Fugitive.

Response to Item 4

The Agency's letter dated 24th January 2022 requested the following information:

'4. A revised noise impact assessment to include impacts at sensitive receptors including the neighbouring SAC.'

A revised noise model and impact assessment was undertaken to include Grain Stores, Replacement Dryer 6 and associated structures. The mitigation measures proposed in the updated Air Model (31st March 2021) were also included.

Items that require mitigation within the worst-case scenario noise model were identified to comply with typical EPA limits at receptors of:

- Daytime (07:00 to 19:00) - 55dB L_{Ar,T}
- Evening time (19:00 to 23:00) - 50dB L_{Ar,T}
- Night-time (23:00 to 07:00) - 45dB L_{Aeq,T}

Please refer to document *'Attachment 7-5-1 E1835-Noise Impact'*.

Response to Item 7

The Agency's letter dated 24th January 2022 requested the following information:

'7. An assessment of the integrity of both the existing Integrated Constructed Wetland (ICW) and the ICW Extension.'

Confirmation of the ICW1 construction and permeability test results were issued to the Agency previously in correspondence dated 31st January 2022.

Please find attached the outstanding information regarding the confirmation of construction and permeability test results of ICW Extension (ICW2) prepared by Red Mills / IE Consulting Ltd. Please refer to the following document:

- Integrated Constructed Wetland (ICW) System – Phase 2 As Built Permeability Assessment

Reconfiguration of the onsite drainage network to ensure all stormwater from the Site will discharge via the extended ICW is ongoing (please refer to drawing D2 Proposed Drainage P710/P710A, submitted on 30th November 2021). By the end of March 2022, we wish to confirm that the following works will have been completed:

- Installation of monitoring chamber and discharge point at SW1A;
- Connection between the existing ICW and ICW extension; and,
- Installation of a new large-scale interceptor and separator, replacing two existing interceptors.

Remaining works will include installing a new pipe connecting the southern portion of the site with the ICW. Red Mills are in the process of obtaining a road opening licence from Kilkenny County Council in order to complete these works.

Response to Item 8

The Agency's letter dated 24th January 2022 requested the following information:

'8. An updated Non-Technical Summary to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.'

An updated Non-Technical Summary to reflect the updated information - 'Attachment 1-2 E1835 NTS' - accompanies this submission.

We trust this submission will again demonstrate to the Agency that Red Mills remain fully committed to addressing all of the Agency's requirements to allow for a proposed licence determination to be issued on Reg No. P1069-01.

We would like to reiterate that both Red Mills and our consultants, Malone O'Regan Environmental remain available to meet to discuss this submission should the Agency consider such a meeting would be of a benefit.

We look forward to hearing from you.

Yours sincerely,



EUGENE BRENNAN B.Agr.Sc.
EHS Manager.

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