

Office of Environmental Sustainability,  
Environmental Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford

1<sup>st</sup> June 2022

**Re: Clondrisse Pig Farm Ltd.  
Licence Application  
Ref. P0975-02**

Dear Sir/Madame,

I refer to your correspondence of 30<sup>th</sup> May 2022 and 24<sup>th</sup> May 2021 in relation to our client, Clondrisse Pig Farm Ltd. Please find detailed below the response to the issues raised.

➤ **Correspondence of 30/05/2022**

- 1. Ensure that the number of houses and the labelling of the houses are consistent with the revised site plan and the revised modelling report(s) as requested on 24 May 2021 and point 10 below.**

**The site plans and drawings have been revised accordingly as discussed hereafter.**

- 2. With regards to the back-up generator, confirm:**
  - a) The bunding in place for the generator fuel;**
  - b) The fuel type; and**
  - c) Volume stored in the storage tank for the generator.**

**The Back up generator is located within an enclosed shed on an impervious concrete base. Same is bunded however additional works are to be considered to ensure that same complies with licence conditions. The generator is a diesel generator with c. 0.2-0.3 m3 stored at any one time.**

- 3. With regards to the hot water heating system, confirm the annual usage of kerosene.**

**Annual kerosene usage = c. 20 m3.**

4. Confirm the protections to be put in place for the kerosene tank.

**Impact protection measures (Crash barrier or similar) is to be completed around the kerosene storage tank.**

5. With regards to water usage onsite:

a) Confirm the grid reference for the onsite well; and



MEASURE AREA

GET COORDINATES

CLEAR MEASURES

ING (EPSG 29902) Easting: 258728.62

ING (EPSG 29902) Northing: 252958.86

ITM (EPSG 2157) Easting: 658666.98

ITM (EPSG 2157) Northing: 752981.45

WGS84 (EPSG 4326) Longitude: -7.1152568

WGS84 (EPSG 4326) Latitude: 53.5235201

Web Mercator (EPSG 3857) Easting: -792066.76

Web Mercator (EPSG 3857) Northing: 7080428.22

New URL: [https://gis.epa.ie/EPAMaps/default?](https://gis.epa.ie/EPAMaps/default?gext=258728.6,252958.9,258728.6,252958.9)

[gext=258728.6,252958.9,258728.6,252958.9](https://gis.epa.ie/EPAMaps/default?gext=258728.6,252958.9,258728.6,252958.9)

COPY URL TO CLIPBOARD

b) Confirm current and proposed water usage. The figure provided in the application (7,500m<sup>3</sup>) is less than the 2018 AER figure (10,000m<sup>3</sup>). The 2019, 2020 and 2021 figures were not available.

**Proposed annual water usage = c. 10,000 m3.**

6. Confirm the grid references for the three storm water discharge points.

SW – 1



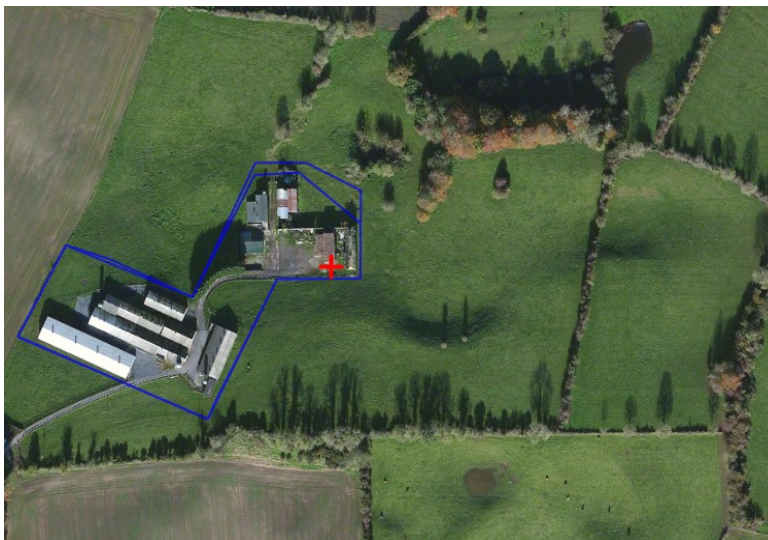
MEASURE AREA

GET COORDINATES

CLEAR MEASURES

ING (EPSG 29902) Easting: 258704.41  
ING (EPSG 29902) Northing: 253017.48  
ITM (EPSG 2157) Easting: 658642.77  
ITM (EPSG 2157) Northing: 753040.07  
WGS84 (EPSG 4326) Longitude: -7.1156108  
WGS84 (EPSG 4326) Latitude: 53.5240495  
Web Mercator (EPSG 3857) Easting: -792106.17  
Web Mercator (EPSG 3857) Northing: 7080527.34  
New URL: <https://gis.epa.ie/EPAMaps/default?gext=258704.4,253017.5,258704.4,253017.5>  
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SW – 2



MEASURE DISTANCE

MEASURE AREA

GET COORDINATES

CLEAR MEASURES

ING (EPSG 29902) Easting: 258833.69  
ING (EPSG 29902) Northing: 253036.84  
ITM (EPSG 2157) Easting: 658772.03  
ITM (EPSG 2157) Northing: 753059.42  
WGS84 (EPSG 4326) Longitude: -7.1136582  
WGS84 (EPSG 4326) Latitude: 53.5242089  
Web Mercator (EPSG 3857) Easting: -791888.81  
Web Mercator (EPSG 3857) Northing: 7080557.20  
New URL: <https://gis.epa.ie/EPAMaps/default?gext=258833.7,253036.8,258833.7,253036.8>  
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SW – 3



7. With regards to Organic Fertiliser:

a) Confirm the dates of installation for each of the slurry tanks onsite;

- Houses (incl. storage tanks) G1, G2, G3 and G4 constructed 2013.
- House (incl. storage tank) F constructed 2009.
- All remaining house /slurry storage structures pre mid 1990's.

b) Confirm the depth of each slurry tank;

c) Confirm the total capacity (excluding freeboard); and

Please refer to enclosed table in respect of points b and c.

d) Provide further details regarding the proposal for frequent slurry removal e.g. which houses it will apply to, the method of removal, frequency of removal, details of external storage etc.

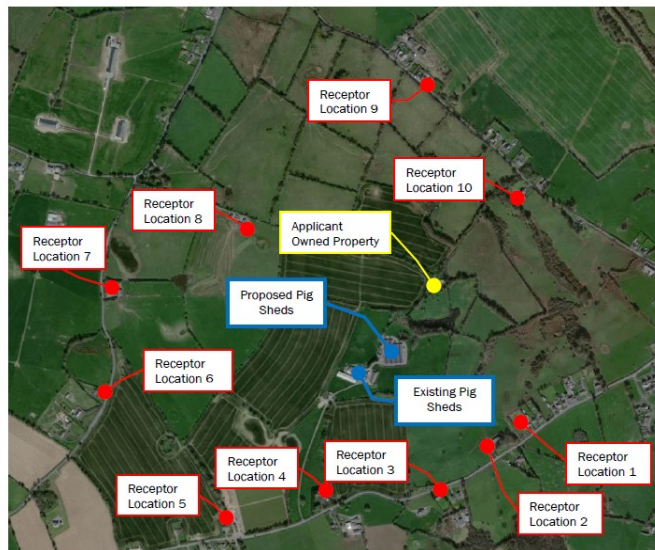
Frequent Slurry removal will apply to houses G1 to G4. Notwithstanding that these houses were constructed prior to the Commission Implementing Decision of February 2017, it is proposed to mange these houses to reduce potential emissions. Slurry will be removed from these houses at regular intervals when the slurry depth exceeds 500mm but prior to it exceeding 800mm. Same will be removed under vacuum to the loading area/extraction point and from there by vacuum tank to an off site slurry storage tank (capacity 2000m3). This ancillary storage is owned by a director of the applicant company, where it will be stored until such time as it is utilised as an organic fertiliser on the adjoining tillage lands (also owned/farmed by a director of the applicant).

**8. Provide a revised odour assessment based on the new “EPA Pig Odour Screening Tool”.**

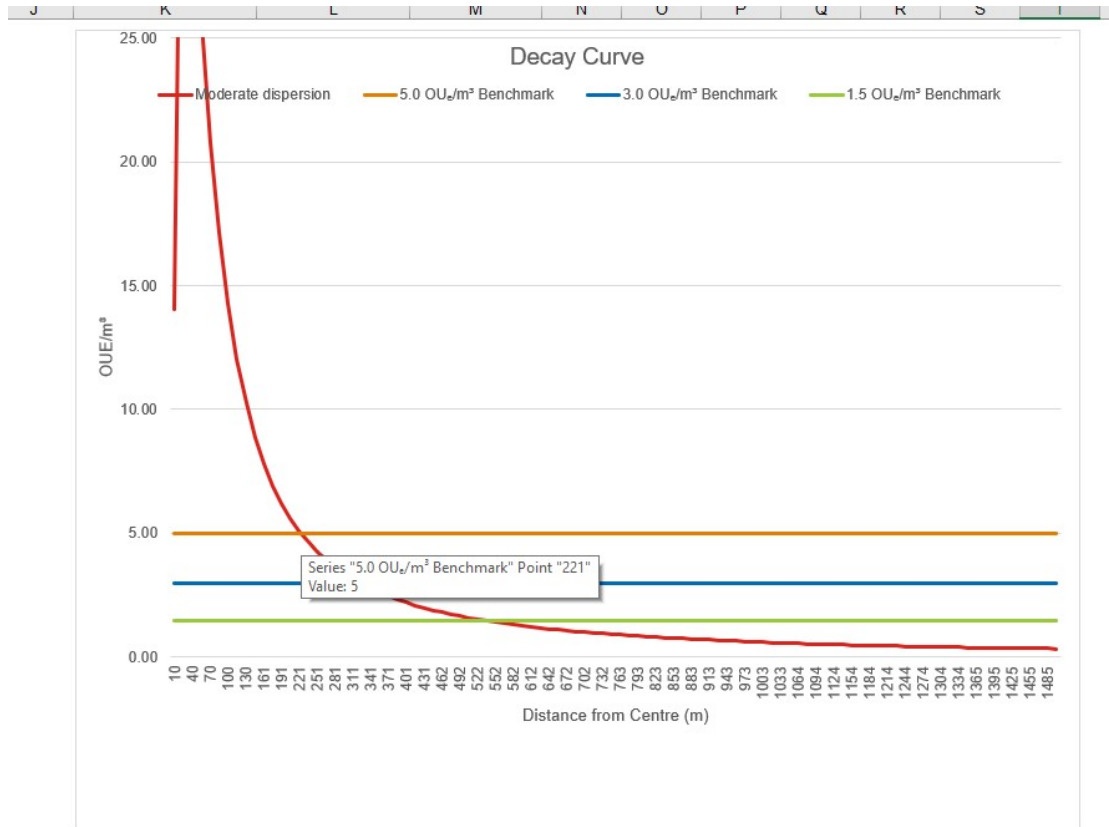
**Notwithstanding that this is only draft guidance and without prejudice, an odour assessment in line with the draft Agency guidance has been completed. When account is taken of the proposed mitigation measures;**

- **3% decrease in crude protein in Sow, weaner and finisher diets (30% Reduction in odour).**
- **Frequent removal of slurry from the production pig houses (25% reduction , or 12.5% if combined with low protein (42.5% combined)**

**There are no third party locations likely to be significantly adversely impacted by the existing/proposed development.**



Location	Description*	ING Grid Co-ordinates	Approx. distance to pig shed (m)
1	Property to the SE	259267 252824	455
2	Property to the SSE	259144 252746	400
3	Property to the South	258983 252602	445
4	Property to the SSW	258604 252601	470
5	Property to the SW	258268 252500	750
6	Property to the West	257849 252930	960
7	Property to the NW	257873 253275	940
8	Property to the NNW	258334 253480	595
9	Property to the North	258942 253959	860
10	Property to the NE	259256 253583	635



9. Revise the 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 e.g. drainage, storm water discharge points, well, septic tank, fuel storage, generator etc.;
- c) Consistent numbering and labelling of all animal houses onsite; and
- d) Any further clarifications included in the previous request of 24 May 2021 that impacts the site plan.

Please refer to enclosed drawings.

**10. The revised Natura Impact Statement and Ammonia Impact Assessment Report as requested in the previous request of 24 May 2021:**

- a) Should take account of the updated background data in the SCAIL model; and**
- b) Should be prepared in accordance with the EPA guidance document “Assessment of the impact of ammonia and nitrogen on Natura 2000 sites from Intensive Agriculture Installations”:**  
<https://www.epa.ie/publications/licensing--permitting/industrial/ied/Assessment-of-Impact-of--Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations.pdf>

**Please refer to revised reports.**

**In addition to the above, please also provide an updated non-technical summary (Application Form, and EIAR where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.**

➤ **Correspondence of 24/05/2021**

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.**

**The application is to be considered on the basis of 3318 production pigs forthwith. The accompanying submissions have been / will be revised on this basis.**

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.**

**The additional fee is to be submitted under separate cover**

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.**

**Revised site and public notices to be submitted under separate cover.**



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:
- The full site boundary outlined in red;
  - All infrastructure located within the site boundary clearly identifiable with legible labels;
  - 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
  - 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.

**The reports referred to have been/will be revised inline with the site plans, drawings and house numbering as detailed on the drawings submitted.**

5. Clarify the bunding and protections for the back-up generator on-site.

**The generator is located on a concrete base and is bunded.**

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.

**All heating is currently oil fired hot water heating, with an annual usage of c. 20m3.**

7. With regards to water usage onsite:
- Clarify whether the onsite well is the only source of water for the site;
  - Confirm if a meter is in place as required under condition 3.6 of the existing licence;  
and
  - Provide records of water usage over the last 12-month period.

**Water Supply to the farm is from an on-site well, an additional off-site well and public supply and is metered. Water Usage 10,000 m3/annum as per 2021 AER.**

8. **Update Attachment 9 of the application form in relation to Cessation of Activity to reflect the swine activities onsite.**

**Please refer to enclosed Revised Attachment 9**

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.**

**Please refer to enclosed emergency response procedure.**

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.**

**Updated Section 7.7 to 3 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.**

**Please refer to enclosed attachments.**

12. With regards to Organic Fertiliser:

- a) The Record 3 submitted with the application states that the installation exported 9,100m<sup>3</sup> of organic fertiliser in 2020 when operating as a 625-sow unit, but the application estimates only 8,112m<sup>3</sup> organic fertiliser will be produced when operating as an integrated unit for 625 sows and 3,318 production pigs. Provide clarification on this;

**The comparison above does not take not account other factors that could influence the availability of slurry including, but not limited to the fluctuation in tank levels etc., (i.e. opening and closing stock of organic fertiliser).**

- 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.

**The applicant can provide an additional 2,000m<sup>3</sup>+ storage (net of Free board) located off-site to make up for any decrease in capacity on the farm and ensure that 26 weeks storage capacity is available. Please refer to enclosed storage capacity (re-calculated to take account of frequent removal) which confirms that there is still in excess of 26 weeks storage available on site. In tanks where frequent removal is to be applied a maximum 800mm storage capacity has been applied in line with operating requirements.**

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:
- 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);
  - 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  $50\mu\text{m}^3$ . This should display contours down to an odour unit of  $10\mu\text{m}^3$ . 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.

**Please refer to response to correspondence of 30/05/20220.**

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

**Please refer to revised Ammonia Impact Assessment enclosed.**

The logo for CLW Environmental Planners Ltd. features a black horizontal bar with the company name in white serif font. To the left of the bar are several overlapping squares in shades of blue and green, with a vertical black line intersecting them.

**CLW Environmental Planners Ltd.**

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23 Farnham Street,  
Cavan,  
Co. Cavan

Phone: 049-4371447/9

Fax: 049-4371451

E-mail: info@clw.ie

- g) Provide an updated NIS to reflect the amended Ammonia Impact Assessment Report required under Point number (f) above.**

**A revised NIS has been enclosed.**

If you require any additional information please contact this office.

Yours faithfully,

*Paraic Fay*

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**Paraic Fay**  
**B.Agr.Sc.**