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Mr. Paraic Fay
On behalf of Doon Farm Enterprises Limited

25 April 2023

Reg. No.: P1024-02

Further Notice under the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Doon Farm Enterprises Limited for an installation located at Doon, Araglin, Kilworth, County Tipperary.

Dear Mr. Fay,

I refer to the EPA's notice of 17 November 2022 requesting information in respect of your licence application.

You are advised that there remains outstanding information, as required under the EPA (Industrial Emissions) (Licensing) Regulations 2013, as amended. You are therefore required to submit the outstanding information detailed below:

1. Planning:

Provide a copy of Tipperary County Council's final grant of planning permission for planning permission ref. 96/574.

2. Best Available Techniques (BAT):

The response provided regarding BAT 30 was not complete. You are required to submit the following outstanding information in relation to houses A, B, 2.1 and 10.1:

- a) Specifically reference the technique or combination of techniques that are proposed to be utilised. Your response of 21 March 2023 lists possible scenarios only. Confirm which of the two techniques referenced will be implemented.
- b) Provide sufficient detail to clarify how the measures proposed will comply with the specific BAT technique referenced. Your response of 21 March 2023 lists possible scenarios but did not provide any specific details of how the applicant proposes to comply with Commission Implementing Decision (CID) document for the Intensive Rearing of Poultry or Pigs (2010/75/EU, Feb 2017). The application

cannot progress without sufficient detail to demonstrate compliance with BAT 30:

If BAT 30(a.1), a vacuum system for frequent slurry removal (in case of a fully or partly slatted floor) is to be implemented, the following is required:

- i. The method and frequency of slurry removal including details on the type of vacuum system proposed and how restrictions in the slurry depths in the tanks under houses A, B, 2.1 and 10.1 will be managed;
- ii. The type and capacity of external slurry storage proposed on-site to facilitate implementation of this BAT technique;
- iii. Revisions to the on-site slurry storage capacity taking account of the restrictions in depth that would be required in the tanks under Houses A, B, 2.1 and 10.1 and the external slurry storage tank(s) as per points i. and ii. above; and
- iv. An updated site plan outlining associated proposed infrastructure.

If BAT 30(b), slurry cooling is to be implemented, the following is required:

- i. Details on the slurry cooling system proposed;
- ii. Details on the associated heat recovery system proposed;
- iii. Clarification on how the efficacy of the slurry cooling system will be maintained e.g. provide details on the monitoring of temperature and a maximum depth;
- iv. Clarification on how much of the on-site heating requirements will be provided by the heat recovery system;
- v. Updated resource usage;
- vi. Written confirmation from an engineer that the slurry cooling system can be retrofitted/installed in each of the houses to meet the specifications for slurry cooling to comply with BAT 30 as outlined in the CID/BREF documents; and
- vii. An updated site plan outlining associated proposed infrastructure.

- c) With regards to the infrastructure proposed to comply with BAT 30, where applicable (e.g. for external slurry storage tanks), provide written confirmation from the planning authority that planning permission is in place or that it is not required. Your response of 21 March 2023 did not provide this confirmation.

3. Capacity and Stocking:

Your response of 21 March 2023 to the request for a breakdown of animal numbers by pig type for each of the animal houses, contained several discrepancies e.g. house 4, 11 and 12 were omitted as well as 100 finishers. Complete the following table in full, ensuring the total number and type of pigs proposed are accounted for and the house references correspond with the site plan:

Table 1:

House No.	Pig type(s) ¹	Capacity (for each pig type)
1		
2		
2.1		
3		
4		
5		
6		
7		
8		
9		
10		
10.1		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
A		
B		

4. Odour Assessment:

The odour assessment submitted is not satisfactory. You are required to submit a revised odour assessment taking account of the following:

- a) The odour benchmark for a new (unlicensed) installation is 3 OUE/m³ as per the EPA “Instruction note for the assessment of odour emissions from intensive agriculture pig installations²”. The odour assessment submitted referenced a benchmark of 5 OUE/m³;
- b) Maiden gilts were omitted from the odour assessment. The assessment should include the maximum number of maiden gilts proposed i.e. 100;
- c) The reduction applied for a low protein diet appears to have been over estimated for dry sows. The maximum reduction that can be applied is 24% given that the proposed reduction of crude protein in the dry sow feed is between 2.4% and 3%;

¹ Pig types should be chosen from one of the following options: farrowing sows, dry sows, served gilts, weaners, production pigs (growers, finishers, boars and maiden gilts).

² [Licensing & Permitting: Industrial Emission Licensing \(IED\) Publications | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/licensing/industrial-emission-licensing/)

- d) A 30% reduction was applied to all weaners for a low protein diet, but this reduction should not be applicable to weaners;
- e) Any proposed external slurry storage tanks must be included in the assessment; and
- f) Moderate dispersion can only be selected if evidence is provided to support the criteria outlined in the instruction note. For each house, provide the stack height above roof ridge and the efflux velocity in the following table:

Table 2:

House No.	Stack height above roof ridge	Efflux velocity
1		
2		
2.1		
3		
4		
5		
6		
7		
8		
9		
10		
10.1		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
A		
B		

5. Ammonia Assessment:

The ammonia assessment submitted is not satisfactory. You are required to submit a revised ammonia assessment taking account of the following:

- a) As background levels are already exceeded for ammonia and nitrogen at sensitive receptors within the zone of influence, detailed modelling of emissions including in-combination effects is required. Where the applicant feels detailed modelling is not required, a full detailed justification is required to be submitted as part of the application. Refer to the EPA's document

“Assessment of the impact of ammonia and nitrogen on Natura 2000 sites from Intensive Agriculture Installations”³ in your response.

- b) The revised Natura Impact Statement (NIS) is incomplete and does not fully address the previous requests for information. You are required to submit the following details for each house:
- stack heights (m);
 - ventilation details: number of fans, fan locations, fan diameters, fan flow rates (m³/s);
 - housing floor area (m²);
 - flooring type (e.g. fully slatted floors etc.);
 - livestock number by animal type for all animals for both the existing and proposed activity. It is not acceptable to only state “sub-threshold development” and “proposed development”; and
 - Breakdown on what reduction applied for a low crude protein diet for each animal type.
- c) With regards to the Blackwater Callows SPA, you are required to update the NIS to provide a detailed justification for the exclusion of a critical load for nitrogen deposition ensuring all qualifying interests are considered.

6. Site Layout:

- a) Provide justification for the exclusion of the feed mill from the proposed installation boundary. Section G of the application form (Resource Use and Energy Efficiency) referenced an on-site feed mill. The site plan submitted with the application included the feed mill within the installation boundary as did the site plans submitted with your correspondences of 18 April 2018 and 23 October 2018;
- b) Clarify the purpose of the generator located just outside the eastern boundary which had been located within the boundary in previous site plans;
- c) In addition to the feed mill and the generator being excluded, the site boundary appears to have been re-drawn from that proposed in the site plan submitted with the application and the site plans submitted with your correspondences of 18 April 2018 and 23 October 2018. The northern, southern, eastern and western boundaries are all different. Provide clarification on this; and
- d) With regards to the yard and buildings located outside the south-eastern boundary of the site:
- i. Provide details of the materials stored and activities carried out there; and
 - ii. Clarify whether any of the buildings, yard or associated infrastructure is related to the proposed activity to which this application relates.

³ [Assessment-of-Impact-of-Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations-2023.pdf \(epa.ie\)](#)

In the case where 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.

With a view to advancing this application for determination, the above-mentioned information should be submitted to the EPA by within 8 weeks.

It should be noted that failure to comply with this request may result in the EPA activating Regulation 19 of the EPA (Industrial Emissions)(Licensing) Regulation 2013 which pertains to Withdrawal or Abandonment of application for a licence.

Your prompt attention to this matter is requested.

Yours faithfully,

Linda Cahill

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