



Electronic Copy

Mr. Patrick Ryan  
On behalf of Ballyfaskin Enterprises Ltd

21 December 2023

Reg. No.: P0915-02

Further Notice under the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Ballyfaskin Enterprises Ltd for an installation located at Ballyfauskeen, Ballylanders, Co Limerick.

Dear Mr. Ryan,

I refer to the EPA's notice of 08 September 2023 requesting information in respect of your licence review 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. **Animal numbers:** Your response of 25 November 2023 to question 2(a) is incomplete as you did not provide clarification on the proposed stocking rate. Conflicting information has been provided on the proposed stocking rate throughout the application and in the odour impact assessment report and the ammonia impact assessment report submitted 25 November 2023.
  - a) Confirm the proposed stocking rate of the installation for all pig types. In the interest of clarity, complete table 1.1 below.

**Table 1.1**

Animal Types	Proposed Maximum Number
Farrowing sows	
Dry Sows	
Maiden gilts	
Boars	
Weaners	
Production pigs	

- b) Provide an updated Non-Technical Summary (Application Form, and EIAR where applicable) with the proposed stocking numbers ensuring there are no conflicting figures for any pig types.
2. **Slurry production:** The increase in slurry production of just 124 m<sup>3</sup> per annum under the proposed stocking rate is not plausible given the increase in animal numbers. The calculation of existing and proposed slurry production on page 8 of the Non-Technical Summary, submitted as part of the application, and reiterated in your response of 25 November 2023, contains several errors. Submit corrected values for the slurry production from the installation at the existing and proposed stocking rates.
3. **Landspreading:** Provide a copy of the Record 3 form (as required under Article 23 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 as amended, for the previous year (2022). Herd numbers of customer farmers can be obscured for privacy if desired.
4. **Odour Impact Assessment:** The odour impact assessment report received 25 November 2023 conflicts with information provided in the application and some of the other further information received 25 November 2023:
- a) Two new animal buildings are referenced throughout the report despite the application stating that no new animal buildings are proposed and that the site boundary would be unchanged. Furthermore, the report states that the proposed installation will house a higher number of pigs than is being applied for in this licence review. Provide clarification on this;
- b) The figures provided throughout the report, which outline the site layout, differ from the site layout plans provided in the further information received 25 November 2023 (Attachment 3-2 Figure 1(a) Site Layout Plan and Attachment 3-2 Figure 1(b) Site Layout Plan) e.g.
- i. The inclusion of the two new buildings referenced above;
  - ii. An increased site area and changed boundary to accommodate these two new building; and
  - iii. Different building numbering.

**Provide clarification on this.**

- c) Frequent slurry removal to external storage is proposed as an odour mitigation technique. Provide further details on this proposal:
- i. Which houses it will apply to;
  - ii. The method of removal/vacuum system;
  - iii. The frequency of removal;
  - iv. Location, type and dimensions of external storage;

- v. Inclusion of emissions from external storage in the odour modelling; and
- vi. An updated site layout plan outlining associated proposed infrastructure.

**It is important to note that mitigation measures will be specified in any licence granted.**

- d) A 30% reduction in odour emissions is applied in the report based on a 3% reduction in crude protein in the animal feed. Provide details, for each pig type, of the proposed crude protein percentage in the feed proposed to be used on-site.

**It is important to note that where a reduction in crude protein is outlined as an odour reduction technique, a crude protein limit will be specified in any licence granted.**

- 5. **Ammonia Impact Assessment:** The ammonia impact assessment report received 25 November 2023 conflicts with information provided in the application and the other further information received 25 November 2023:

- a) Two new animal buildings are referenced throughout the report despite the application stating that no new animal buildings are proposed and that the site boundary would be unchanged. Furthermore, the report states that the proposed installation will house a higher number of pigs than is being applied for in this licence review. Provide clarification on this;
- b) The figures provided throughout the report which outline the site layout differ from the site layout plans provided in the further information received 25 November 2023 (Attachment 3-2 Figure 1(a) Site Layout Plan and Attachment 3-2 Figure 1(b) Site Layout Plan) e.g.
  - i. The inclusion of the two new buildings referenced above;
  - ii. An increased site area and changed boundary to accommodate these two new buildings; and
  - iii. Differing building numbering.

**Provide clarification on this.**

- c) The report states that multiple BAT measures are proposed for ammonia mitigation, but it is not clear which specific measures will be implemented and which have been modelled for the ammonia assessment. It is not acceptable to apply a conservative reduction of 20% based on multiple BAT compliant technologies without providing specific details on the specific technologies that will be implemented on-site. Provide clarification on this and clearly demonstrate how the specific mitigation measures have been factored in to the ammonia assessment.

**It is important to note that mitigation measures will be specified in any licence granted.**

- d) With regards to the ammonia emission factors listed for the pig types:
    - i. Provide clear justification for the use of each factor; and
    - ii. Clearly outline the combination of factors used in the modelling.
  
  - e) Frequent slurry removal to external storage is proposed as an ammonia mitigation technique. Confirm if this will be implemented and if so provide further details on the proposal:
    - i. Which houses it will apply to;
    - ii. The method of removal/vacuum system;
    - iii. The frequency of removal;
    - iv. Location, type and dimensions of external storage;
    - v. Inclusion of emissions from external storage in the odour modelling; and
    - vi. An updated site plan outlining associated proposed infrastructure.
  
  - f) Slurry cooling is proposed as an ammonia mitigation technique. Confirm if this will be implemented and if so provide further details on the proposal:
    - 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 applicable 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 layout plan outlining associated proposed infrastructure.
  
  - g) Reduced crude protein content in the animal feed is proposed as an ammonia mitigation technique. Provide details, for each pig type, of the proposed crude protein percentage in the feed proposed to be used on-site.
6. With regards to the mitigation measures specified in the odour impact assessment report and in the ammonia assessment report, update all relevant sections of the application, including but not limited to, the site layout plan, organic fertiliser storage capacity, BAT etc.

***All BAT/mitigation proposed, and the overall implications of their application must be factored into all your responses to this request for further information.***

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

Your prompt attention to this matter is requested.

Yours faithfully,

Linda Cahill

Environmental Licensing Programme  
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