

Electronic Copy
Mr. David Wynne
On behalf of Carhue Piggeries Limited

31 January 2024 Reg. No.: P0621-03

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Carhue Piggeries Limited for an installation located at Cooligboy, Timoleague, Bandon, County Cork, P72 HD61.

Dear Mr. Wynne,

I refer to the application for a licence received by the EPA on 15 November 2023.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. Stormwater:

a. Clarify what controls (i.e. silt traps) it is intended to install on the stormwater discharge points.

2. Site plan:

- a. There are discrepancies (i.e. the number of buildings) between the site plans used in the NIS and those submitted as part of the application. Confirm which version of the site plan aligns with the installation as built/proposed to be built, and if necessary, resubmit an updated site plan.
- b. Update the site plan such that all buildings are uniquely identified. It is noted that there are both new and old buildings labelled as Houses 1-4.

3. Animal Numbers:

The number of pigs it is proposed to keep on the installation vary between documents submitted in support of the application. Confirm the number and type (i.e. dry sow, production pig, etc.) of pigs it is proposed to keep in each house at the installation by filling in Table 1 below. Ensure that all documents submitted in support of the application have assessed this number of animals or higher.

Table 1:

House No.	Pig type(s)	Capacity (by type)

Ensure the labelling of the houses on the site plan aligns with the labels used in the table above.

4. Sanitary Effluent:

Disposal of sanitary effluent via septic tank or percolation area is considered an emission to ground. If there are sanitary facilities at the installation, indicate how this effluent is being managed. Update the site plan to include any treatment infrastructure as necessary.

5. Ammonia and odour modelling:

a. An error has been made in the selection of the emission factor for production pigs used in the submitted ammonia modelling report.

The BAT-AEL for production pigs takes into account the variation of emissions throughout the lifecycle of a production pig, i.e. from 30 kg to slaughter, and has already been weighted to account for the ratio of growers to finishers. Rerun the model with the correct emission factor (2.6 kg-NH₃ animal⁻¹ year⁻¹) and resubmit the ammonia modelling report.

- b. Submit documentation (i.e. feed analyses) for each pig category supporting the claim that reduced protein diets are used onsite.
- c. Provide confirmation a letter from the Anaerobic Digestion facility to which pig slurry is exported. Confirming the quantity of pig slurry that they will take on a daily/weekly basis and a commitment that they will continue to do so exclusively from the licensee.
- d. It is not credible that a third odour mitigation technique would have a significant effect on odour reduction. Furthermore, frequent removal of slurry is a necessary part of the successful operation of a slurry cooling system and will already be accounted for in the ammonia/odour reduction associated with the technique. It is necessary to rerun the odour model with an appropriate level of odour mitigation (i.e. 42.5%) and resubmit an updated odour modelling report.
- 6. **Water supply**: Attachment 4.6.1 "Water and Energy Usage" of the application form does not provide the total supply of water for the installation.
 - a. Clarify the proposed sources of water to be used for the activity and the quantity of water usage expected per annum from each source.
 - b. The site plan contains two wells marked as AGW-7. Clarify which is to be referred to as AGW-7, provide a label for the other well, and update the site plan accordingly.
- 7. **Organic Fertiliser:** Conflicting information has been provided in the application with regards to slurry storage and management:
 - a. Clarify the number of slurry storage/wash water tanks proposed.
 - b. Clarify whether the slurry store named 'Reception Pit 1' in Attachment 7.6.2(a) Landspreading Controls is associated with the AD plant at Timoleague AgriGen (P0986-01) or with the installation. Note that only slurry storage directly under the applicant's control should be considered for the purpose of calculating the available slurry storage capacity onsite.
 - c. In light of the above, clarify the total storage capacity that will be available (total capacity minus the freeboard) and whether 26 weeks' storage capacity will be available onsite.

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

The requested information should be submitted to the Agency within **12 weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact licensing@epa.ie.

In the case where any 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.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at Licence application guidance | Environmental Protection Agency (epa.ie).

Please direct any queries to <u>licensing@epa.ie</u>.

Yours faithfully,
Philip Stack
Environmental Licensing Programme
Office of Environmental Sustainability

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