

Office of Licensing, Climate and Resource Use,  
Environmental Protection Agency,  
P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford

6<sup>th</sup> February 2024

**Re: Doon Farm Enterprises Ltd. ~ Licence Application P1024-02**

Dear Sir/Madam,

I refer to previous Agency correspondence of 25<sup>th</sup> April 2023. Please find the response to the issues raised outlined below;

**1. Planning:**

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

**Please find enclosed a copy of decision as requested.**

**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:**

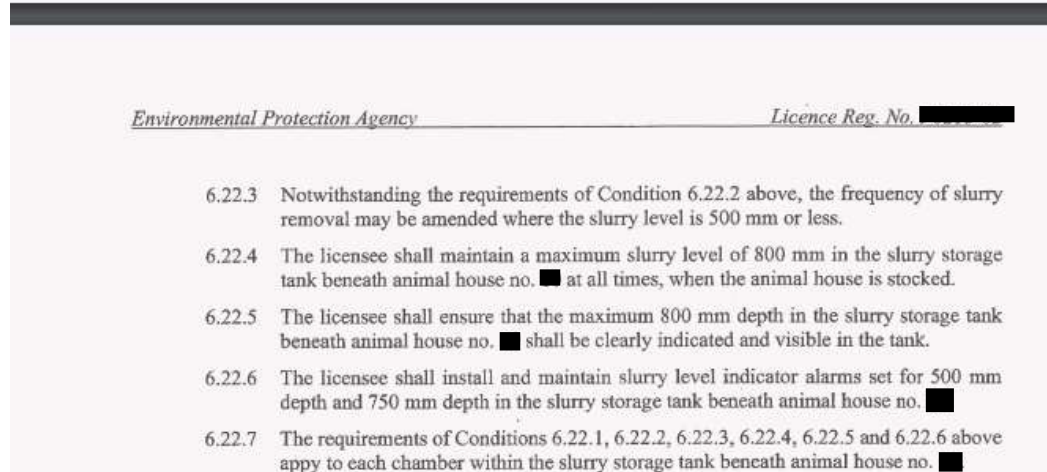
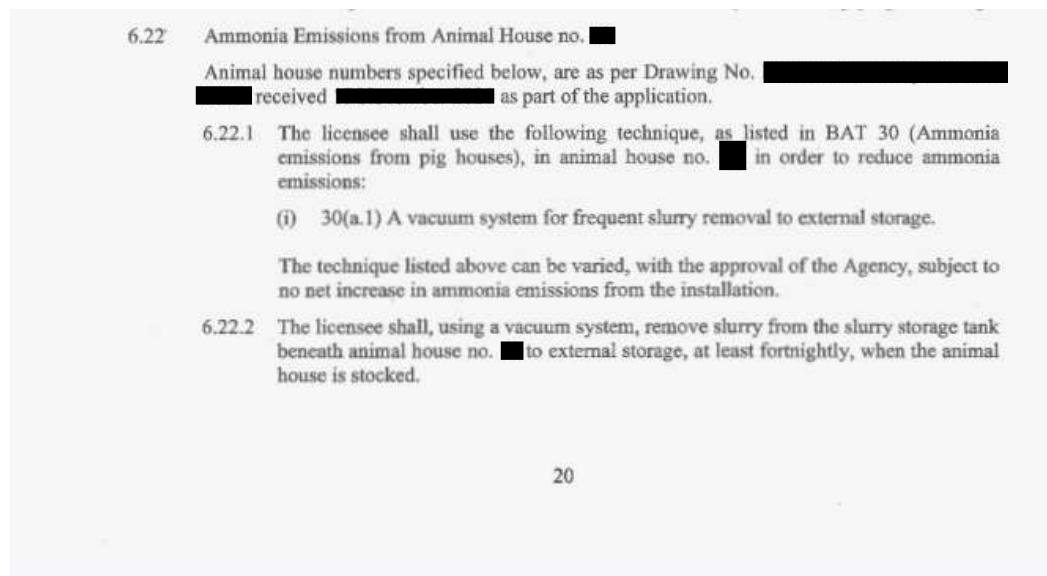
- a) **Specifically reference the technique or combination of techniques that are proposed to be utilised. Your response of 21 March 2023 lists possible scenarios only. Confirm which of the two techniques referenced will be implemented.**
- b) **Provide sufficient detail to clarify how the measures proposed 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:**

**2.B.1) It is proposed to operate a frequent slurry removal system in Houses B, 2.1, 10.1 & 10.2).**

**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;

**Slurry Management will be in line with other existing licenses as issued by the Agency As detailed below;**



- ii. The type and capacity of external slurry storage proposed on-site to facilitate implementation of this BAT technique;

**No additional on-site storage is proposed. Slurry is to be exported off-site to additional storage facilities to be provided by the applicant, who utilizes organic fertiliser from this farm in connection with his bovine farming enterprise. Said facilities have been approved by Tipperary Co. Co. under Planning Ref. 23/60788, and are to be completed forthwith.**

- 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

**Please refer to revised slurry storage capacity table attached.**

- iv. An updated site plan outlining associated proposed infrastructure.

**Please refer to updated site plan enclosed.**

### **2.B.2) It is proposed to install slurry cooling in House A.**

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

- i. Details on the slurry cooling system proposed;

**A slurry cooling system will be placed on the concrete floor of the tank. This will consist of pipes, through which a coolant liquid will be pumped and circulated. Same will be attached to a heat pump external to the house.**

- ii. Details on the associated heat recovery system proposed;

**The heat pump as referred to above will extract the heat out of the coolant and transfer same to the heating system associated with some of the existing houses on-site. Any necessary ancillary works to integrate same will be completed at that time.**

- 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;

**A temperature probe will be incorporated to monitor the temperature of the slurry. Slurry depth will be managed so as to ensure that the minimum temperature (12-15 degrees) is maintained in the slurry. Slurry can be extracted and moved to customer farmers (incl. the applicant's dairy farm) as required.**

- iv. Clarification on how much of the on-site heating requirements will be provided by the heat recovery system;

**At this juncture it is unknown how much of the on-site heating requirements will be met by the heat recovery system, as there are very few such systems operating in Ireland upon which to base an assessment.**

- v. Updated resource usage;

**At this juncture it is unknown how much of the on-site heating requirements will be met by the heat recovery system (and thus what this may mean for resource consumption on site), as there are very few such systems operating in Ireland upon which to base an assessment.**

- 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**

**Same has been requested and will be submitted under separate cover.**

- vii. **An updated site plan outlining associated proposed infrastructure.**

**It is not anticipated that any additional significant infrastructure will be required on-site. A heat exchange unit / Heat pump (Such as the Thermia Mega Heat pump) will be required.**

- 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.**

**Please refer to enclosed grant of permission 23/60788 in relation to the provision of additional storage facilities, on the applicants bovine farm.**

### 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:**

<b>House No.</b>	<b>Pig type(s)<sup>1</sup></b>	<b>Capacity (for each pig type)</b>
<b>1</b>	<b>Dry Sow</b>	<b>90</b>
<b>2</b>	<b>Dry Sow</b>	<b>130</b>
<b>2.1 (Low Emission)</b>	<b>Farrowing Sow</b>	<b>38</b>
<b>3</b>	<b>Farrowing Sow</b>	<b>22</b>
<b>4</b>	<b>N/A</b>	
<b>5</b>	<b>Farrowing Sow</b>	<b>20</b>
<b>6</b>	<b>1<sup>st</sup> Stage</b>	<b>440</b>
<b>7</b>	<b>Farrowing Sow</b>	<b>20</b>
<b>8</b>	<b>2<sup>nd</sup> Stage Weaner</b>	<b>150</b>
<b>9</b>	<b>1<sup>st</sup> Stage Weaner</b>	<b>200</b>
<b>10</b>	<b>1<sup>st</sup> Stage Weaner</b>	<b>640</b>
<b>10.1 &amp; 10.2 (Low Emission)</b>	<b>2<sup>nd</sup> Stage</b>	<b>180</b>
<b>11</b>	<b>2<sup>nd</sup> Stage</b>	<b>450</b>
<b>12</b>	<b>2<sup>nd</sup> Stage</b>	<b>115</b>
<b>13</b>	<b>Grower/ Finisher</b>	<b>190</b>
<b>14</b>	<b>Grower/Finisher</b>	<b>510</b>
<b>15</b>	<b>Gilt</b>	<b>100</b>
<b>16</b>	<b>Grower/ Finisher</b>	<b>300</b>
<b>17</b>	<b>Grower/ Finisher</b>	<b>360</b>
<b>18</b>	<b>Grower/Finisher</b>	<b>240</b>
<b>19</b>	<b>Grower/ Finisher</b>	<b>510</b>
<b>20</b>	<b>Grower/Finisher</b>	<b>190</b>
<b>A (Low Emission)</b>	<b>Dry Sow</b>	<b>180</b>
<b>B (Low Emission)</b>	<b>Grower/Finisher</b>	<b>1100</b>

<sup>1</sup> 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).

#### 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/m<sup>3</sup> as per the EPA “Instruction note for the assessment of odour emissions from intensive agriculture pig installations<sup>2</sup>”. The odour assessment submitted referenced a benchmark of 5 OUE/m<sup>3</sup>;
- 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%;
- 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 mm (Ridge = 0)	Fan Size (Diameter m)	Efflux velocity (Please refer to enclosed Air Quality Impact Assessment Report)
1	+965mm	0.6	
2	+830	0.6	
2.1	+100	0.6	
3	+0	0.37	
4	N/A		
5	+200	0.4	
6	+0	0.37	
7	-0.5	0.4	
8	0	Natural Ventilation	
9	+200	0.4	
10	-200	0.4	
10.1, 10.2	0	0.6	
11	+100	0.4	
12	0	0.6	
13	+100	0.6	
14	+300	0.6	
15	+300	0.6	

<sup>2</sup> [Licensing & Permitting: Industrial Emission Licensing \(IED\) Publications | Environmental Protection Agency \(epa.ie\)](#)

<b>16</b>	<b>0</b>	<b>Natural Ventilation</b>	
<b>17</b>	<b>0</b>	<b>Natural Ventilation</b>	
<b>18</b>	<b>0</b>	<b>Natural Ventilation</b>	
<b>19</b>	<b>+300</b>	<b>0.6</b>	
<b>20</b>	<b>0</b>	<b>0.6</b>	
<b>A</b>	<b>+965</b>	<b>0.6</b>	
<b>B</b>	<b>+1900</b>	<b>0.6</b>	

**Please refer to enclosed Air Quality Impact Assessment Report**

**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*"<sup>3</sup> 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 (m<sup>3</sup>/s);
  - housing floor area (m<sup>2</sup>);
  - 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.

<sup>3</sup> [Assessment-of-Impact-of--Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations-2023.pdf \(epa.ie\)](https://www.epa.ie/publications-and-reports/assessments-and-reports/assessment-of-impact-of-ammonia-and-nitrogen-on-natura-sites-from-intensive-agriculture-installations-2023.pdf)

- 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.

**Please refer to enclosed Air Quality Impact Assessment Report and revised NIS.**

## 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

**Further to previous discussions on-site, please refer to updated site plan enclosed. While the feed mill & generator had been excluded based on the fact that the operation of same was not exclusively related to the adjacent pig farm, they have been re-incorporated into the site area, based on confirmation from the Agency that this was not an appropriate basis on which to exclude same. The site plan has been revised to ensure that all developments associated with the licensable activity are contained within the identified site boundary.**

- d) With regards to the yard and buildings located outside the south-eastern boundary of the site:
- Provide details of the materials stored and activities carried out there; and
  - Clarify whether any of the buildings, yard or associated infrastructure is related to the proposed activity to which this application relates.

**The buildings and structures to the south east of the pig farm relate to the applicant's dairy farming enterprise and are not, in any way, related to the licensable activity. The applicant is also a customer farmer for pig manure and utilises same on his own land as an organic fertiliser. Organic Fertiliser will/may be transferred to his tanks prior to application to land.**



The logo for CLW Environmental Planners Ltd. features a stylized graphic on the left consisting of overlapping squares in shades of blue, purple, and green, intersected by a black crosshair. To the right of this graphic is a solid black horizontal bar containing the company name in white serif font.

**CLW Environmental Planners Ltd.**

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**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**

**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.**

**No revisions are required to the non-technical summary.**

If you require any additional information please contact this office.

Yours Sincerely,

*Paraic Fay*

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