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Environmental Protection Agency,  
Office of Environmental Sustainability  
Inniscarra,  
Co. Cork

28/03/2024

**RE: Response to Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Mr Michael Monagle for an installation located at Annakisha North, Doneraile, County Cork, P51 EY43.**

Dear Philip,

NRGE on behalf of Michael Monagle of Annakisha North (P0446-01) herein provide the information requested by the agency on the 16<sup>th</sup> of November 2023 in relation to the licence review submitted on the 17<sup>th</sup> of May 2023.

1. **Appropriate Assessment:** With regards to Appropriate Assessment, and the Natura Impact Statement (NIS) received as part of the application, 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. You are required to update and re-submit the NIS taking account of the requirements below and any other relevant points outlined in this letter:
  - a. Only the legally permitted stock onsite may be considered as part of the background ammonia concentration or used when demonstrating a reduction in ammonia emissions due to the implementation of mitigation measures relative to the existing installation.
  - b. Provide SCAIL / site specific modelling to demonstrate that there will be no impact on European sites. Where no impact on European sites cannot be demonstrated through SCAIL, site specific modelling may be more appropriate.
  - c. Have reference to the EPA's guidance document "Assessment of the impact of ammonia and nitrogen on Natura 2000 sites from Intensive Agriculture Installations", which can be found on the Agency's website at the following link:



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<https://www.epa.ie/publications/licensing--permitting/industrial/ied/Assessment-of-Impact-of--Ammonia-and-Nitrogen-on-Natura-sites-from-Intensive-Agriculture-Installations-2023.pdf>

See Attachment 1: Annakisha Pig Farm NIS Updated 2024

See Attachment 2: Ammonia Assessment\_ March 2024

2. **Odour Assessment:** Odour Assessment: The EPA's odour screening tool has indicated that odour levels may exceed  $6 \text{ OU}_E/\text{m}^3$  at nearby sensitive receptors. This is the odour limit that an existing installation must comply with.
  - a. The EPA recently published an odour screening tool and "Instruction note for the assessment of odour emissions from intensive agriculture pig installations". The odour screening tool and instruction note can be found on the Agency's website at the following link: <https://www.epa.ie/publications/licensing--permitting/industrial/ied/instruction-note-and-screening-tool-for-the-assessment-of-odour-emissions-from-i.php>.
  - b. Provide a map showing the location and distance from the installation boundary to the closest sensitive receptors. The map should also highlight which sensitive receptors are owned by the applicant or his family and which are third party dwellings.
  - c. Provide an assessment of the odour emissions from the activity and the impact on local residents. The required odour impact assessment should be undertaken in line with the approach outlined in the above-mentioned document and tool.
  - d. The assessment should be supported by use of a model to predict odour concentrations at the sensitive receptors in the vicinity of the installation. The assessment should, as appropriate, identify odour reduction/mitigation measures.

See attached from Katestone Ireland

Attachment 3: Odour Assessment\_ March 2024



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### 3. Landspreading of slurry:

- a. Attachment 7.6.2(a) *Landspreading Controls Agri - Operational Report for the Management of Organic Fertiliser* of the application form has not been fully filled in.
  - i. Provide the farm location (townland and county), the area of land available for spreading (in acres/hectares), and the import capacity in m<sup>3</sup>.

Please see the following attached documents

Attachment 4: Updated *Land spreading Controls Agri*.

Attachment 5: Landspreading Register.

- ii. Confirm that there are sufficient spreadlands available for the total quantity of slurry generated per annum by the activity.

There is sufficient spreadlands available as can be demonstrated from table 7.6.2 b ii (and Landspreading register) where there is a customer base of 15,361 cubic metres and total amount of slurry produced will be circa 11,000 cubic metres.

### 4. Soiled water:

- a. What is the source of the soiled water collected in the soiled water tank (labelled structure 13 on the site plan)?

Soiled water is produced by washing on site, this includes washing of the mix room/grain store.

- b. How is this soiled water disposed of?

All soiled water is diverted back to the slurry tank.



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5. **Waste:** With regards to waste generated onsite, give estimated quantities of veterinary waste and waste fluorescent lighting tubes to be generated at the proposed stocking rate.

*See Attachment 6: Updated Waste Generated + Animal By-Products generated.*

6. **Storm water:** Clarify what controls (i.e. silt traps) are installed or it is intended to install on the stormwater discharge points.

*All storm water from around the site is directed to the rainwater harvest tank (structure 11 on site plan) which acts as a silt trap as the silt and debris settles to the bottom before the water is discharged via AASW1 or used for washing on site.*

Kind Regards,

*David Wynne*

David Wynne BSc.(EnvSc)  
**Operations Manager**