



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Sub. no. 1

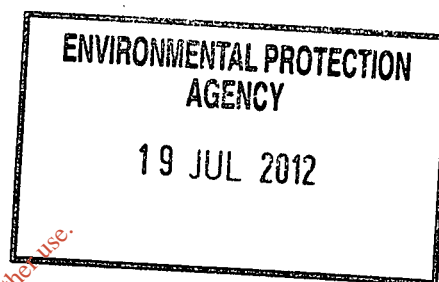
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HSE Dublin/North East
Cavan and Monaghan
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Ref/ BC/CO'D

17 July 2012

Ms Noeleen Keavey
Office of Climate, Licensing & Resource Use
Environmental Protection Agency
Headquarters
PO Box 3000
Johnstown Castle Estate
Co Wexford



Re/ Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity/ Class 6.1

The rearing of poultry in installations weather within the same complex or within 100 metres of the same complex, where the capacity exceeds 40,000 places.

Applicant/ Francey's Farm Ltd, Dunseark, Clones Co Monaghan.

Ref. No/ P0962-01

Dear Ms Keavey,

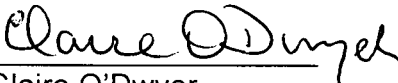
Please find enclosed the HSE consultation report in relation to the above application.

If you have any queries regarding the report, the initial contact is Ms Claire O'Dwyer A/Principal Environmental Health Officer.

The Environmental Health service response to the application is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- A site visit.
- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.

Yours sincerely,


Claire O'Dwyer
A/Principal Environmental Health Officer

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Health Service Executive

Environmental Health Service,
HSE Dublin/North East,
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Ref. CO'D/BC

17 July, 2012

Ms. Claire O'Dwyer,
A/Principal Environmental Health Officer,
Environmental Health Office,
The Arcade,
Main Street,
Cavan,
Co. Cavan.



Re/ Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity/ Class 6.1

The rearing of poultry in installations weather within the same complex or within 100 metres of the same complex, where the capacity exceeds 40,000 places.

Applicant/ Francey's Farm Ltd, Dunseark, Clones Co. Monaghan.

Ref. No/ P0962-01

Dear Claire,

I refer to the recent submission of an EIS and IPPCL application from Francey's Farm Ltd concerning the proposed poultry operation at Dunseark, Clones, Co. Monaghan.

The following are observations made whilst reviewing the said application in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit on Friday 06 July, 2012.

Manure Storage/Supply

- In the Non Technical Summary the report claims that the **majority** of the organic fertiliser will be transported by the farmers listed in Appendix 1, however, Section 4.1 states that **all** of the manure will be allocated to the farmers listed in Appendix 1. During the site visit the applicant stated that he only intends to spread soiled water on his land at the appropriate times. It is recommended that this issue is clarified.
- Contrary to what is stated in 4.1 of the EIS report, Appendix No. 1 does not identify or list the farms in receipt of the organic fertiliser.
- During the site visit the applicant only identified one manure store. In Section 4.2 of the EIS Report the applicant claims to have two existing manure stores. However, Appendix No. 3 does not identify a second existing store. It is therefore recommended that this issue is clarified with the applicant to ensure that the storage capacity for manure will be sufficient to deal with the existing and proposed units.
- It was noted during the site visit that the existing manure store marked No. 9 on the site layout in Appendix 3 is not capable of preventing seepage of liquids/effluent. The applicant has drilled a number of holes at the base of the structure to release effluent to surface water/ground water contrary to Part 2 Article 6(1) of the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2010 S.I. 610 of 2010. It is recommended that the applicant repair the said damage to the structure to comply with the aforementioned legislation and prevent any further contamination of water courses.

The applicant suggested, during the site visit, that he may construct the proposed manure store unit himself. It is therefore recommended that the applicant is made aware of the following conditions pertaining to all poultry manure and wash-water storage structures whether or not on the site of the unit:

- *A minimum of six months storage capacity dedicated to the unit is required.*
- *All construction work should be certified by a chartered engineer as having been constructed according to S108 or S123 as appropriate, (DAFF, 1987 and 1994).*
- *Where the poultry manure storage structures are constructed to another design specification, then both the design specification and the subsequent construction work should be certified by a chartered engineer as being suitable for the task and comparable to the Department of Agriculture, Food and Forestry specifications.*
- *All storage tanks should be inspected by a chartered engineer and certified as structurally sound for the purpose they were intended subsequent to construction and at appropriate intervals thereafter.*
- *Leak detection facilities based on inspection chambers and perimeter wall and under floor drains should be provided as appropriate.*

Odour Control.

- Batneec Guidance note recommends that poultry units be sited a distance of not less than 400 metres from the nearest neighbour. As stated in the applicants EIS report, the poultry units nearest neighbour are approximately 200 metres from the units and the nearest neighbour to the newly constructed poultry unit is 120 metres. To date, the applicant claims there have been no complaints from neighbours, however, the impact of the proposed three new units may significantly alter the impact of odour nuisance on the said neighbours. Therefore, it is recommended the applicant use the best available technology to reduce the effects that increased odour emissions may have as described in Section 4.4 of the Batneec Guidance note.

Surface Water Discharge/Ground Water.

- Section 4.7 of the EIS report suggests that all storm water and roof water will be discharged via a storm water collection system. At present, an adequate storm water/roof water collection system does not as yet exist for the three proposed units. The existing storm/roof water collection system, previously in place, is not fit for purpose.
- Surface water discharge points are not clearly identified on the plans as stated in the Section 7.3 of the EIS report.
- The proposed new manure cross conveyor transporting manure from poultry house marked No. 2 to the existing manure store marked No. 9 on the site layout in Appendix 3 has the potential to significantly increase surface water contamination. The proposed conveyor crosses the manure handling apron marked No. 11 on the site layout in Appendix 3. It is recommended that the applicant take every precaution to ensure the said conveyor is appropriately constructed, contained and managed to ensure manure does not contaminate the handling apron yard. Such contamination would result in surface water contamination and ultimately contamination of the ground water. Strict monitoring of this area is highly recommended. It is also recommended that a baseline of groundwater quality is established in the neighbourhood of the site and all of its land spreading areas prior to start-up. Periodic water quality monitoring of relevant parameters as per licence is also recommended.
- If the applicant is successful with his application, there will be a significant increase in the amount of soiled water produced at the facility. It is therefore recommended that the applicant is made aware of the following conditions.

The rate of land spreading or application of poultry manure or wash-water should be in accordance with the provisions contained in either of the following sources:

- *'Rural Environment Protection Scheme, Farm Development Service: Agri-environmental specifications', (Current edition of DAFF Guidelines).*

Or,

- 'Soil analysis and fertiliser, lime, animal manure and trace element recommendations', (Current edition of Teagasc Guidelines).

Regardless of the dilution factor, the maximum hydraulic loading per single application should not exceed 25m³ per hectare on shallow limestone soils and in no case should exceed 50m³ per hectare.

Water Supply

- Currently the facility is supplied with water from the Drumgrole Water Group Scheme. However, the applicant has two bore wells on his property which were previously used as the main supply of water. The two bore wells are currently not in use due to difficulties with the pumps in the said wells.
However, there is a strong possibility that the applicant may in the future decide to start reusing the said wells as a source of water for the facility. It is therefore recommended that the applicant is made aware that Potable water supplies must comply with quality parameters of Drinking Water Regulations (S.I.278 of 2007).

If a well is installed a groundwater protection plan should be drawn up to address but not be limited to the following issues:

- details of water source
 - details of bedrock
 - details of overburden
 - vulnerability of the borehole
 - groundwater flows and gradient
 - inner and outer zones of protection
 - details and assessment of land use
 - current activities and past activities in the source protection zones
- It is recommended that regular testing of the well water is carried out to ensure its quality and to ensure it is free from avoidable contamination.

Nutrient Management Plan

- There was no nutrient plan included in the EIS Report.

A Nutrient Management Plan (NMP) should be maintained on site for the management of poultry manure and wash-water arising at the unit and should include:

- Calculation of the quantity of manure and the amount of nutrients available from manure including any manure or other wastes imported.
- The results of soil fertility and drainage tests on existing or proposed land spreading areas.

- A representative soil sample, to a depth of 10cm, should normally be taken biennially from every 2 to 4 hectares and at least one per farm. However, where soil types are similar and cropping and treatment of the lands were the same during the previous 5 years or more, a composite sample from an area up to 12 hectares is acceptable.
- An assessment of the relationships between manure application rates, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- Ordinance Survey Maps to a scale of 1:10,560 showing the location of the said land spreading areas and all environmentally sensitive features on the lands or in their vicinity; including *interalia* dwellings houses and sensitive buildings, drains, streams, watercourses and other sources of water supply.
- Agreements between 'importers' and 'exporters' of all animal manures or other wastes are required.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

Other

- HSE/Environmental Health was not included in the scooping process.

Yours faithfully,


Barry Coady
 Environmental Health Officer

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