Submission No. 1

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
The Arcade
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Co Cavan

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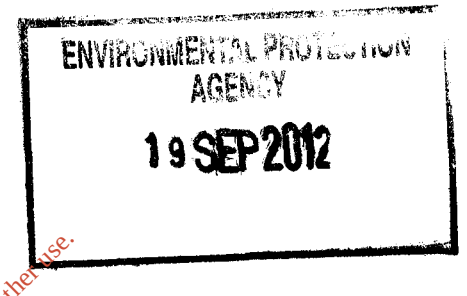
Ref/ BC/CO'D

18 September 2012



Bea Claydon
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 6.1.0

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/ Mr. Philip Hutchinson, Corvaghan, Clones, County Monaghan, Monaghan.

Ref. No/ P0967- 01

Dear Ms Claydon,

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.
- No additional investigations / measurements were undertaken.
- A Site Visit
- 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,
Cavan and Monaghan,
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Ref. CO'D/BC

18 September, 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.

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Ref. No/ P0967- 01

Dear Claire,

I refer to the recent IPPCL and EIS submissions from Mr. Philip Hutchinson concerning the proposed poultry operation at Corvaghan, Clones, Co Cavan.

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 14 September, 2012.

Manure Storage/Supply

It is 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.

At the south end of the excising unit is the loading area for manure. This area is uncovered and contains soiled water as a result of a mixture of rain/storm water from the roof of the unit and manure. It is recommended that the applicant covers the said area to protect it from rain etc therefore avoiding any potential over flow of soiled water either back in to the unit or onto clean areas outside of the unit. Also, the area in question is highly dangerous and would not comply with the Safety, Health and Welfare at Work Act 2005.

The loading area itself is currently unsuitable as the ground beneath and surrounding the conveyor belt, used for loading, is not concreted. It is therefore inevitable that surface water contamination and ultimately contamination of the ground water in this area will occur. It is recommended that said area is concreted and piped to receive soiled water to a suitable tank. Strict monitoring of this area is highly recommended.

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, no storm water/roof water collection system exists and no Storm Water Layout was in included with appendix 18. Currently the storm/roof water simply drains to ground.

Therefore, in order to protect both surface and groundwater resources in the vicinity of the site and landspreading areas a site investigation is essential and it is generally advisable that it be carried out by a qualified hydrogeologist. The site investigation should provide information on:
Depth to water table (if shallow).
Depth to bedrock (if shallow) and details of bedrock outcrops.
Subsoil and bedrock type and quantitative assessment of permeability.
Presence or absence of karst features – caves, swallow holes etc. – if bedrock is limestone.
Aquifer classification and groundwater vulnerability in accordance with the provisions of 'Groundwater protection schemes in Ireland: A proposed approach', (Daly, 1995).
Private wells within 200 metres and all public wells within 1 kilometre of site and 300 metres of the landspreading areas.
Direction of groundwater flow.
Baseline information on surface and groundwater quality.
Location of all watercourses adjacent to the site and landspreading areas.

In addition the investigation should include information on soil types and nutrient status.

- 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 25m^3 per hectare on shallow limestone soils and in no case should exceed 50m^3 per hectare.

Water Supply

The unit is supplied by two sources, The Coleman Water Group Northern Ireland and a Bore Well.

- The bore well located at the applicants dwelling which is approx 100 meters from the poultry unit and is the main source of drinking water for the birds. The well is currently uncovered or protected to prevent contamination. Remedial work on the said cover needs immediate attention.

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 treatments 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.

Animal/Bird Carcasses

Currently all dead bird carcasses are stored in two wheelie bins near the manure loading point. Due to the strong prevailing winds the bins are prone to being blown over. It is recommended that the bins are secured at all times.

Other

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

Yours faithfully,

Barry Coady
Environmental Health Officer