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Ms. Anne Kehoe,
Office of Climate, Licencing, & Resource Use,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

25-Apr-13

Re; IPPC Licence Application & EIS – P0944-01 Mr. Michael O' Hea, Woodfield,
Clonakilty, Co.Cork.

Dear Ms. Kehoe,

I refer to your letter dated 25/3/2013, to the Environmental Directorate, Cork County Council, seeking observations on the above IPPC licence application & accompanying EIS. The letter was forwarded to me for comment.

The activity;

The EIS refers to an existing intensive poultry unit which is located at Woodfield , Clonakilty, Co. Cork. Due to the scale of the activity this poultry unit requires an IPPC licence & the EIS was produced to support the application for an IPPC licence.

The applicant states that the facility has a capacity for 75,000 broilers on site but is currently operating at a capacity of 68,000 broilers.

The poultry unit is located in a rural agricultural area & has planning permission for the buildings on site. There is no dwelling house within 350m of the poultry unit.

The applicant states that;

- The unit is supplied by water from an on-site bored well, & a public water supply.
- Clean storm water from the site is disposed of to surface water drains on site.
- Poultry manure generated on site is disposed of to an authorised composting facility.
- Wash water generated from washing down poultry houses, after the birds & manure have been removed, is disposed of by spreading on local lands in accordance with the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2010.
- Dead birds arising on site are disposed of to a licensed rendering plant via an authorised collector.
- Other wastes arising on site are disposed of to authorised waste facilities.
- A vermin control system is in place on the site.

Queries Arising from EIS & Application Documentation;

I have a number of queries on the information submitted by the applicant as follows;

1.The Header on each page of the EIS is as follows;

EIS – Amendment to Planning conditions at M O' Hea Poultry Farm, however there is no indication in the document that the applicant proposes any amendment to planning conditions, nor has any planning application been lodged for this site recently.

Please clarify what the Header refers to.



2. The planning history on pages 21/22 of the EIS is not consistent with the text at Section 1.2, page 8, *Proposed Development / Operational development*,

Section 1.2 states that;

The site is located at Woodfield, Clonakilty, Co. Cork (E533481,N541649). This poultry farm is currently operating as a c.68,000 place broiler farm in 3 houses. (House 1, 19,000 birds placed (capacity 22,000 birds), House 2 23,000 birds placed (25,000 bird capacity) and House 3 26,000 birds placed (28,000 birds capacity). Therefore there is an overall capacity for 75,000 birds. Planning permission was granted for 3 No. poultry sheds and ancillary site works which have been constructed.

The Planning History on Page 21/22 States that;

There have been three previous planning applications relating to the site at Woodfield, Clonakilty, Co. Cork. These applications can be detailed as follows:

Planning Application Ref. No. S/95/3361. This application was made by Mr Michael O Hea seeking permission for the erection of a Poultry House, store and associated site works. This

application was granted on 09/04/1996, represents the current House 1 and has a planned capacity of 20,000 broilers.

Planning Application Ref. No. W/97/2340. This application by Mr Michael O Hea sought permission for the erection of a poultry house. This was granted planning permission on 08/08/1997, represents the current House 2 and has a planned capacity of 20,000 broilers.

Planning Application Ref. No. W/03/4584. This application was made by Mr Michael O Hea and sought permission for the erection of a poultry house, store and ancillary services. This was granted planning permission, represents the current house 3 and has a planned capacity of 34,000 Broilers.

Please clarify the above discrepancies.

3. The applicant was granted planning permission in 2007 for a poultry manure store under Planning Ref. No. 07/1690, this is not referred to in the EIS. This store has not been constructed.

4. The EIS provides a table on p. 68 dealing with wastes arising. This table refers to 471 tonnes Poultry Litter & 166m³ Soiled water produced per annum. However a similar table (Attachment 1, Table H1(i) Waste), in the letter from the Applicant dated 22/3/2013 (Article 11 Reply) refers to 610 tonnes Poultry Litter & 292m³ Soiled water produced per annum.

Please clarify the above discrepancies.

5. On page 13 of the applicants letter to the EPA dated 3/7/2012 the applicant refers to 141.12m³ wash water generated on site. Again this is not consistent with information contained in other applicant documentation, see query 4 above.

Please clarify the above discrepancies.

6. On Page 15 of the applicants letter to the EPA dated 3/7/2012 the applicant refers to a soiled water tank on site with capacity 13m³, however in previous planning application Ref. No. 07/1690 the capacity of this tank was stated to be 19m³.

Please clarify the above discrepancy.

7. On Page 18 of the applicant letter to the EPA dated 3/7/2012 the applicant refers to 505 tonnes of poultry litter being generated on site. This is not consistent with information contained in other applicant documentation, see query 4 above.

Please clarify the above discrepancy.

8. Section 5.4.2 of the EIS states that the site is serviced by an on-site well & by a public water supply, however the applicant has confirmed to me that the site is served by an on-site well & there is no public water supply at this site.

Please clarify the above discrepancy.

Site Visit, 24/4/2013.

I visited the site on 24/4/2013 & met the operator on site.

The following are my comments based on the site inspection;

- There was evidence of some litter being pushed into adjoining field at house 3 during loading of litter, this should be cleaned up & care taken to avoid this in future.
- Some of the soiled water from the washing of buildings may be escaping off the concrete aprons at the rear of the buildings, & may not be reaching the soiled water tank, this may need to be reviewed & suitable kerbing put in place as necessary.
- The oil storage tank near the office building should be contained in a bunded area.

Comments;

Subject to clarification of the above queries, I have no objection on environmental grounds to the activity carried out on site.

Planning permission was granted by Cork County Council for the buildings on site.

The site is located in a sparsely populated rural agricultural area & is well separated from any dwellings.

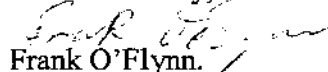
No complaints of an environmental nature have been received regarding this site.

Adequate measures appear to be in place for the management of wastes generated on the site, these wastes will also be subject to control under the IPPC licence.

The principle waste generated on site, poultry litter, is removed off site for composting in Co. Wexford, therefore there is no requirement for storage & landspreading of this material locally.

The proposed IPPC licence will control all environmental issues on site.

Yours sincerely,


Frank O'Flynn.

Senior Executive Scientist,

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