Sub (4)

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Department,
HSE - South,
Elmwood House,
Lurriga,
Skibbereen,
Co. Cork.

Tel Number: 028 51456
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17 April 2013

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

Re Integrated Pollution Prevention and Control Licence Application no P0944-01

Dear Ms Kehoe

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

If you have any queries regarding any aspect of this report, please contact me and I will refer you to the appropriate person in the department.

The following HSE departments were made aware of the consultation request for the proposed development on March 26th last

- Emergency Planning
- Assistant National Director for Health Promotion
- RDO
- Estates

No comments for inclusion have been received from them.

The Environmental Health Service response to the proposal is in the attached consultation report.

- The assessment is based solely on an assessment of documentation submitted to this office
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.

Environmental Health Department,
West Cork Community Services,
Email Address: EHO.WESTCORK@hse.ie

- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.

Yours Sincerely

Ger Faughnan

Principal Environmental Health Officer

Ms Ger Faughnan,
A/Principal Environmental Health Officer,
Elmwood House,
Lurriga,
Skibbereen,
Co.Cork

Re: Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: **Class 6.1.0**

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

Applicant: **Mr. Michael O'Hea, Woodfield, Clonakilty, Co.Cork**
Ref. No: **P0944-01**

Dear Ms Faughnan,

I refer to the above application from Mr Michael O'Hea, Woodfield, Clonakilty, Co.Cork I conducted an on-site visit to the Poultry rearing operation and met thereon with Mr Michael O'Hea, on 18th of May 2011. I spoke with Mr O'Hea on the telephone on the 8th of April 2013 This farm has an overall capacity of approximately 75,000 birds per breeding cycle. It exceeds the licensing threshold of 40,000 as set out under Annex 1 of the IPPC directive and the New First Schedule of the EPA Acts 1992 – 2007. The farm comprises of three poultry houses of relatively modern design. Planning permission was granted for one of the houses in 1996. In 1997 and 2003 planning permission was granted for a further two houses.

The farm is owned by Mr Michael O'Hea and all management and operational decisions are taken and overseen by him. Mr Michael O'Hea is the full-time onsite manger with all onsite responsibility.

The main activities at this facility occur during normal working hours between 6 am and 20.00 p.m. Stock inspection in line with normal farming practices are carried out everyday including weekends and holidays. Automatic systems such as feeding, water supply and in-house ventilation operate continuously on a 24 hour basis. The farm produces stock under the An Bord Bia producer scheme called Poultry Products Quality Assurance Scheme.

On-site operations/process

- Transport of day old chicks to the farm
- Feeding and rearing of birds.
- General animal husbandry practices.
- Transport of feed to the farm
- Transport of birds from site to factory at c. 35 - 52 days of age.
- Removal of litter from the houses.
- Transport of Litter off site.
- Washing of houses between each batch
- Bedding of houses with straw/shavings in preparation for the next crop.
- Maintenance of buildings and equipment.
- Recording and monitoring of internal house environment and bird performance and mortality.

On site facilities

The farm is located in a rural area. The closest residential property in the area is approximately ½ a km away from the farmyard setting. Agriculture is the predominant industry in the locality. Facilities comprise of three purpose built chicken rearing houses, a concrete yard, wash water storage tank, ancillary structures, water storage tanks, LPG tank and equipment necessary for the management, husbandry and administration of the enterprise. The facility is served by a water supply from a private well that is chlorinated on site. Copies of recent water testing reports were available at the time of the visit. The results were satisfactory. The structures and equipment on site were specifically designed and installed for the purpose of rearing poultry.

The houses operate on a batch system. Following de-population of the previous batch the houses are cleaned of litter, washed and disinfected. The facility is then re-populated with day old chicks. These are fed and watered using an automatic system until they reach factory weight. The houses are then de-populated and the poultry transferred for slaughter. On average there are six batches per annum confirmed by Mr O'Hea. Currently the rearing units are occupied by 68,000 birds (approx).

Process Description

The existing broiler houses are constructed of concrete block and insulated timber material on a concrete base. They are windowless and have automatic lighting systems. Ventilation and feeding operations are continuous on site.

Ventilation of the houses are based on a fan controlled environment of natural ventilation.

The heat source within the house is generated from LPG and is provided for approximately the first 3 weeks when a new batch arrives.

The floors of the houses are constructed as a solid concrete slab and the birds are kept on litter comprised of wood shavings which is spread over the entire house floor area. Wet litter is avoided for animal health reasons (infection control) and also to minimise ammonia emissions.

The birds are fed a series of four specialised diets over the growing period. Strict hygiene and bio-security measures are practiced to ensure the health status of the flock is maintained at a high level. Where bird mortality does occur the carcasses are removed and stored on site in a fully sealed PVC receptacle pending removal off site by a licensed haulier to an animal rendering plant. These bins were located outside each of the houses.

When batches of bird's reach maturity and are removed off site for slaughter, cleaning of the poultry houses is undertaken. The manure is removed. The floors are then brushed down/cleaned and washed with water prior to disinfection. The houses are left to dry for approximately two weeks at which stage the bird rearing cycle re-commences.

Manure/Poultry Litter

Manure/poultry litter is generated as part of the poultry rearing activity. The applicant in written submission, states that poultry litter is currently transported to Custom Compost, Gorey, Co.Wexford for use in the mushroom industry. Mr O'Hea confirmed this and stated that it is removed immediately from the site when the houses are being cleaned and there is no storage of such waste on site.

Aqueous discharges

Wash water from washing down of the houses is collected on site in an underground concrete storage tank. Roof and storm water discharge naturally into the storm drain.

The application states that all wash water (soiled water) is recovered as a fertiliser and is spread on the land. The site itself is not on an excessively vulnerable aquifer .The applicant intends to comply in full with the requirements of the codes and of good spreading practice and the Nitrates Regulations.

Emissions

The main emissions from the poultry rearing activity are odour and dust emissions from the buildings ventilation system, poultry litter which is currently sent for use in the mushroom industry and wash water which is stated in the submission is recovered by disposal as a fertiliser to land.

1.Air

Emissions to atmosphere from this plant include warm air from the extract ventilation system. The main contaminants present in ventilation emissions are odours, dust and ammonia. This office has been in receipt of no odour complaints from this facility. It is considered that good on-site housekeeping measures will minimise emissions.

2. Surface Water

Surface water is generated from roofs of the Poultry rearing units and concrete paved yardway surrounding the broiler houses. Poultry rearing activities are confined to within the three houses. The yard area exterior of the houses may be come contaminated with poultry litter during the course of litter removal, every 6 – 8 weeks. Surface water run-off should in theory be uncontaminated and therefore should have minimal impact on surface water quality off site.

3. Wash water

Wash water arising from the wash down of the houses is collected in an underground storage tank. The submission identifies that such wash water is used as a fertiliser on agricultural lands.

4. Poultry litter/manure

Manure/poultry litter is generated from the rearing activity. The nutritional value of this averages 11 kg total Nitrogen and 6 kg total Phosphorous per tonne of manure as per the Nitrates Regulations (S.I. No. 378 of 2006). The poultry litter is currently transported to Custom Compost, Gorey, Co.Wexford for use in the mushroom industry.

5. Noise

The site is located in a rural environment at a distance of ½ km to the nearest residence. I am satisfied from on site inspection that the activities carried out at this installation are not likely to result in significant noise emissions.

6. Other Waste

Other wastes generated on site include animal carcases, packaging and fluorescent tubes. Animal carcasses arise from mortalities associated with the rearing of poultry. Carcasses are stored on site in a covered wheelie bin (P.V.C.) and disposed of to Ward Collection Services. B.A.T. guidance requires carcasses to be removed at least fortnightly for disposal. Written submission states that dead bird carcasses account for 3-4 tonnes (approx) of generated annual waste. Hazardous waste is limited to fluorescent light bulbs which are used for lighting and heating. Between 5 – 10 are used annually and the recovered tubes are proposed to be recycled.

Observations/Recommendations

From on-site observations, inspection and discussions with the owner I am satisfied that the on-site facilities, operation and management conform to a high standard of practice. Notwithstanding same the facility does give rise to listed environmental emissions and has the potential to cause nuisance and give rise to complaint, particularly during that phase of the operation when litter is removed and recovered off site.

It is acknowledged that the licensing process comprehensively addresses in a holistic manner the prevention, control and monitoring of generated emissions through the Recommended Determination (R.D.). This office is concerned primarily with highlighting issues of public health/environmental health concern where it is of the opinion that the Licence application does not adequately address such concerns. In this regard a number of issues are identified as being worthy of further clarification/information so that potential public/environmental health impacts are properly controlled/eliminated. This is set out hereunder.

- B.A.T. requires weekly visual inspection of surface water monitoring points and B.O.D. C.O.D. monitoring. No monitoring data in respect of same is submitted by applicant and was not available on site.

Yours Sincerely,

Anne-Louise Grant
A/ Senior Environmental Health Officer