



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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11.06.2013

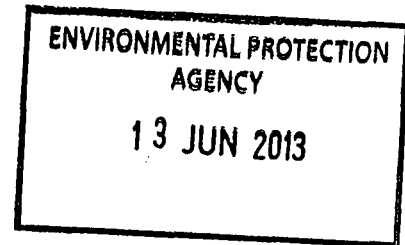
HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report

Type of consultation: IPPC Licence Application with EIS

Planning Authority: Longford County Council

Reference Number: P0966-01



Applicant: Kiernan Breeding Stock, Ardaguillon, Granard, Co. Longford.

Proposed Development:

Activity Class 6.2 The rearing of pigs in an installation, whether within the same complex or within 100 metres of the same complex, where the capacity exceeds - 750 places for sows in a breeding unit, or 285 places for sows in an integrated unit, or 2,000 places for production pigs.

Dear Sir,/ Madam,

I refer to the above application and site inspection on 06.06.2013. The application has been the subject of detailed desk study and review along with on-site visit by Paul McGuinness, Senior Environmental Health Officer and Natasha Higgins, Environmental Health Officer.

The licensable activity is located in a rural agricultural area in the town land of Ardaguillon, Granard, Co. Longford. The village of Lisryan is located approximately 0.8km west of the site. A nearest residential dwellings is located 0.64km north of the site. It was noted that a member of staff permanently resides in a portacabin within the site boundary.

The farm is currently operating with a maximum capacity of 550 sows which creates a total of c. 11,382.8m³ of pig manure.

The class of activity for which the IPPC licence is sought is: **Activity Class 6.2** "The rearing of pigs in an installation, whether within the same complex, or within 100 metres of the same complex, where the capacity exceeds 285 places for sows in an integrated unit" where an integrated unit means "a piggery in which pigs are bred and reared from birth to slaughter".

The application is supported by an E.I.S. prepared by C.L.W Environmental Planners Ltd. This sets out the potential and significant impacts on the receiving environment (arising from proposed construction and operation of the facility) and details the mitigation measures and environmental controls which shall be put in place and maintained by applicant.

Notwithstanding same there are a number of pertinent information omissions, conflicts of

information, and matters requiring clarification before comprehensive appraisal of the proposal can be undertaken. Accordingly, applicant is requested to submit further information in clarification of the following queries.

Emissions from the proposed facility

1. Emissions to atmosphere from this plant include the expelling of warm air from the ventilation system in the buildings and odour and gas volatilisation from organic manure and the site odours generated by land spreading. The odour generated from the land spreading of slurry is the single biggest source of complaint from the general public. However this office has not been in receipt of any odour complaints from this facility to date. The submission has identified measures that will be employed to reduce odour emissions.

The BATNEEC note for pig production sector specified that pig units should be sited a distance of preferably 400m from the nearest neighbouring dwelling. Please note that a member of staff permanently resides in a portacabin within the site boundary.

2. Surface water is generated from roofs of the pig rearing units and paved areas.

The E.I.S. and drawings submitted do not identify the points of discharge of surface waters into the adjoining watercourses. Inspection chambers are not available close to all points of discharge of surface waters to allow for sampling and monitoring to be carried out. Whilst there is a manhole chamber in the yard for the surface water run-off, inspection chambers should also be located closer to the points of discharge. The EIS makes reference to regular monitoring of this surface water discharge however monitoring data, including location of monitoring, has not been submitted with the report.

The method of collection and disposal of wash water from the vehicle wash area has not been addressed.

Periodic water quality monitoring of relevant parameters should also be incorporated into any proposed determination.

3. The IPPC and EIS indicate that the site is serviced by an onsite well and a local Group Water Supply, however the farm manager advised us that the main water supply for the site comes from a well located off site two fields away from the development.

This off site well is piped to a holding tank/reservoir in the farm yard. The water supply is chlorinated on site and from here the water is used in the pig rearing houses and for consumption by staff and people dwelling on site. This supply must be both safe and secure and must comply with the requirements of the EC (Drinking Water) (No.2) Regulations, 2007 particularly with regard to serving the needs of the staff employed and the residential unit on

site. An assessment of the safety and security of the supply should be considered particularly with regard to security of source, the reservoir storage, the disinfection system and contingency plan in the event of malfunction or failure.

The well located on site is used for wheel washing purposes only.

The local Group Water Supply is used only as a back up supply.

There is no certificate of analysis for the on site well. We were informed that the off site well is tested annually in line with Bord Bia requirements.

Assessments as to the effectiveness of the disinfection system were not carried out.

All private wells within 200 metres and all public wells within 1 kilometre of the site should be identified.

4. The site is located in a rural environment where housing density is low and where agricultural (farming) is the predominant activity. BATNEEC specifies the standard noise emission limit values of 55 (daytime) and 45 (night time) dB(A) at any noise sensitive location. Noise limits may be raised outside of the normal day to day levels during the construction phase.

This department has not received any complaints in relation to these noise sensitive areas to date. I am satisfied from on-site inspection/observations that the activities carried out at this installation are not likely to result in significant noise emissions. Notwithstanding same, a system of compliance monitoring for noise emissions should be requested from the applicant. Appendix 14 of the EIS includes details of results of noise monitoring surveys of four intensive farms in County Cavan; however no noise monitoring has been carried out at the farm for which the IPPC licence is being sought.

The applicant should be requested to identify and detail the location of residential dwelling houses and sensitive locations within proximity of the unit.

5. The EIA does not deal sufficiently with the issue of accidental spillage, tank failure, etc. This office requests that the developer describe mitigation measures in the event of such a failure or accidental occurrence which will minimise the effects on public health and the environment.

6. From a public health viewpoint the protection of groundwater sources is an important aspect of this proposal. The GSI has classified the aquifer for this site area as being a locally important aquifer (LI), bedrock which is Moderately Productive only in Local Zones, with a vulnerability rating of low vulnerability.

The E.P.A., B.A.T. document specifies that pig manure may be used as a fertiliser for the activities described above but only in accordance with S.I. 378 of 2006 European Communities (Good Agricultural Practice for protection of Waters) Regulations. In this regard the applicant is required to prepare a detailed Nutrient Management plan providing details in relation to the lands on which the manure shall be recovered, records of all manure movements off site, transportation, nutrient requirements of the land and the crop grown thereon. In this instance the applicant has not identified any land holdings which he is supplying. The NMP should provide maps of all intended spreadlands and soil sample results of such intended spreadlands. We were informed that a contractor called Mr. Ken Butler deals with customer farmers who wish to purchase manure from the facility. We were also informed that random farmers call to the site and acquire slurry when needed. A detailed NMP for manure needs to be submitted.

The EPA/GSI Groundwater Response Matrix suggests that land spreading is acceptable over locally important aquifers where there is a minimum consistent thickness of 1m of soil/subsoil. The applicant should be asked to verify the depth of subsoil. It is recommended that vulnerability assessments of all land spreading areas utilising the Geological Survey of Ireland Groundwater Protection Scheme Map be conducted to assess which areas of spreadland may be extreme, high, moderate or low vulnerability. In areas where there is extreme vulnerability or where there is rock outcropping these lands should be excluded from land spreading. There should also be verification of the subsoil thickness over all spread lands.

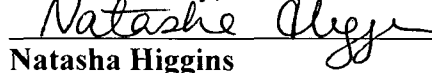
7. Where the spreadlands infringe on the zone of contribution of an aquifer they should be removed from the spreadland.

8. Where this type of operation (land spreading) gives rise to a risk to these identified groundwater sources a precautionary principle should be adopted. All wells within 300 metres of land spreading areas should be identified.

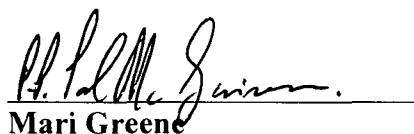
9. It is recommended that the use of a low trajectory splash plate method is deployed in order to reduce odour during land spreading.

10. Regard should be given to the fact that agricultural run-off is known to be a potential source of oocysts which cause cryptosporidiosis. Conventional methods of water disinfection are incapable of killing the oocysts. Cryptosporidiosis can give rise to serious illness especially in vulnerable groups of the community. Cryptosporidium is known to be resistant to conventional treatment and accordingly caution has to be exercised.

Yours faithfully,


Natasha Higgins

Environmental Health Officer


Mari Greene

Principal Environmental Health Officer