



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Department
Health Service Executive,
Dublin Mid-Leinster, Unit 7C,
Lough Sheever Corporate Park,
Robinstown, Mullingar,
Co. Westmeath.
Phone 044 9384890 Fax 044 9384889

14th November 2013

Dorota Richards,
Environmental Licensing Programme,
Office of Climate, Licensing and Resource Use,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstownhouse Castle Estate,
County Wexford.

ENVIRONMENTAL PROTECTION
AGENCY

18 NOV 2013

ID Number : ID0058

Re: HSE consultation report IPPC Licence Application No P0984-01

Proposed Development; 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.

Dear Ms. Richards,

Please find enclosed the HSE consultation report in relation to the above proposal. In addition to this, a copy of this office's report re IPPCL Reg.No. P0975-01 previously forwarded on the 25th February 2013 is enclosed.

If you have any queries regarding any of these reports, the initial contact is Mari Greene, Principal Environmental Health Officer who will refer your query to the appropriate person.

Environmental Health Report

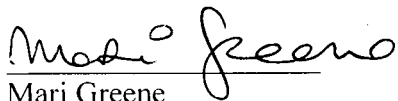
The EH service response to the proposal is in the attached consultation report.

- The assessment is based solely on an assessment of documentation submitted to this office on October 10th 2013 by the National Environmental Health Office.

- Environmental Health were not included at the Screening / Scoping stage of this application
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- This report refers only to those sections of the documents which are relevant to the HSE.
- We have made observations and submissions under the following specific areas;
 - Odour
 - Noise
 - Soils, Geology and Hydrogeology
 - Accident Prevention and Emergency Response
 - Facility / Equipment Cleansing
 - Vermin Control

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Mari Greene, Principal Environmental Health Officer, Environmental Health Office, Unit 7C Lough Sheever Corporate Park, Mullingar, Co. Westmeath.

Yours Sincerely,



Mari Greene
Principal Environmental Health Officer

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14th November, 2013

Re/ IPPC Licence Application No P0984-01

Name & Address of Applicant;

Clondrisse Pig Farm Limited, Gillardstown House, Castlepollard, County Westmeath.

Class & Nature of Activity; 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.

The following are observations made whilst reviewing the said application in conjunction with EPA guidance documents and associated legislation.

This office would like to highlight that the Environmental Impact Statement (EIS) included with this Integrated Pollution Prevention and Control (IPPC) License Application (Reg No. P0984-01) is dated 26th February 2009.

The Environmental Health Department forwarded a submission regarding this Pig installation in respect of a license application (Reg No. P0975-01) on the 25th February 2013. The Environmental Impact Statement included with the license application was dated November 2011.

Odour

On page 24 of the Application Form (Attachment E1), Clondrisse Pig Farm Ltd. states that "Odour from the installation is controlled to a level that does not affect amenity beyond the site boundary by the application of good practice in animal husbandry and in the management of manure handling operations in the site".

It is also stated in Section I.1. Assessment of atmospheric emissions that "There are no air emissions of local environmental significance from the installation".

Section 4.5 (Containment of Emissions) of the EPA Batneec Guidance Note for the Pig Production Sector outlines a series of proactive measures which may be undertaken to minimise and control fugitive emissions from this development.

This office considers that a more thorough assessment of the fugitive emissions which may emanate from this pig rearing facility should be detailed and their off-site impacts (if any) discussed.

Noise

The applicant has stated in the attached application form that;

“The activity does not generate noise levels that would interfere with amenity beyond the site boundary. The Applicant accepts the standard daytime / night-time limits (55/45 db(A)) generally included in licences granted to this class of activity.”

As outlined in the Environmental Health Submission re Reg.No. P0975-01, this office does not agree that due consideration has been given to this subject matter.

We would request that some quantification for noise emissions and mitigation measures be described in the EIS. In particular, due regard should be given to potential noise problems at defined Noise Sensitive Locations.

Distances to noise sources, peak noise events, noise duration and times should also be discussed.

Soils, Geology and Hydrogeology

The following statements have been included by the applicant in sections E.2 and E3 of the Application Form for this IPPC License;

E.2 Emissions to Surface Waters

“There is no process effluent and no emission to surface water from the site. Storm water from roofs and clean yard areas is discharged to a field drain at discharge point marked SW1 on the site plan in Attachment E.2.2 (National Grid Reference 660823, 758255). The receiving field drain flows to the Stoneyford River.”

E.3. Emissions to Ground

“There is no Storm Water emission to ground.”

As outlined in the Environmental Health Submission re Reg.No. P0975-01, a comprehensive assessment of the potential effects of this development on groundwater has not been detailed in this EIS.

The nature of the bedrock, depth to the water table, classification of the aquifer, sub soil classification and permeability, source protection area data, identification of any karst features and direction of groundwater flow should be included in such an assessment.

The information included with this IPPCL application does not allow this office to determine if the potential effects of this development on local drinking water sources have been considered by Clondrisse Pig Farm Limited.

Consideration should be given to potentially vulnerable water extraction points in the locale of the development. This office would suggest that a more detailed survey of water extraction points be presented in an effort to identify the potential risk to public health from polluted groundwater which is abstracted for consumption presently or in future.

On page 18 of the EIS accompanying IPPC Licence Reg.No. P0984-01, Clondrisse Pig Farm Limited state “Manure to be produced in the site would either be used on farmland in the holding to satisfy some of the crop requirement for plant nutrients, or be supplied to customer farmers for their use on their holdings but only in response to farmer demand and only in compliance with law”.

Further to this, the application form IPPC License Reg. No. P0984-01 states "There is no emission of pig manure to land and there is no land-spreading or application of pig manure to land in the installation.

This office would consider it appropriate that clarification surrounding the issue of manure land-spreading at this farm be detailed.

In addition to the above, this office queries the suitability of lands (where manure is actually spread) to safely absorb animal wastes from this pig rearing facility.

There is a requirement under B.A.T. for intensive agricultural sector to demonstrate recovery capacity for nutrients generated. A Nutrient Management Plan (NMP) is required based on European Communities (Good Agricultural Practice for Protection of Waters) Regulations (S.I. 378 of 2006). The applicant has not clearly identified any land holdings which he is supplying and the corresponding relevant information to detail that these lands can safely assimilate the pig manure.

An appropriate risk assessment of spreadlands using relevant information will aid the protection of public health.

It is also considered that more thorough information be presented regarding groundwater vulnerability on any lands where pig manure from this facility is spread. The location of private water supply wells within such proposed spreadlands should be identified, monitoring parameters established and frequency of analysis determined.

In conclusion with regard to soils, hydrology and geology the assessment of the receiving environment has not received due consideration. Therefore, it is recommended that assessments be conducted to determine the predicted impacts of this development on soils, hydrology and geology of actual spreadlands as well as those lands at the piggery.

Accident Prevention and Emergency Response

The developer has stated in Section J "In the event of an accidental leak or discharge of feed or pig manure staff and contractors would be deployed as may be necessary to prevent or minimise environmental damage and impact. The appropriate authorities would be notified. Any necessary remediation would be executed. The cause of the incident would be investigated. Steps necessary to prevent recurrence would be identified and implemented."

This office considers that a more thorough "Accident Prevention and Emergency Response Plan" is required to describe how Clondrisse Farm Ltd. will deal effectively with environmental impacts in the event of an accident or emergency.

In this offices previous submission to the EPA re Reg. No. P0975-01, the Environmental Health Department outlined the following;

(i) Facility / Equipment Cleansing

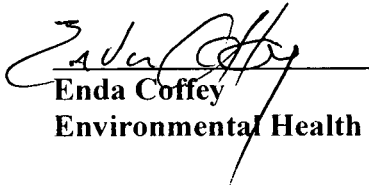
There is no discussion in the submitted information on cleansing procedures at this development. It is requested that consideration be given to the description of pig house cleaning, equipment cleaning, vehicle cleaning, etc. and the potential associated effects on the environment.

(ii) Vermin Control

The Environmental Impact Statement does not outline the appropriate vermin control measures which should be in place to minimise the likelihood of a pest problem developing at the facility. This should be addressed.

This office would like to reiterate its position that these issues should be considered.

Yours faithfully,


Enda Coffey
Environmental Health Officer

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