



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Sub. No 1.

Environmental Health Service,
HSE Dublin/North East,
Cavan and Monaghan,
The Arcade,
Main Street,
Cavan.

Tel: 049 4373418
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Ref/ BC/CO'D

08 August 2014

Ms Noeleen Keavey,
Programme Officer,
Office of Climate, Licencing & Resource Use,
Environmental Protection Agency,
Headquarters P.O. Box 300,
Johnstown Castle Estate,
Co. Wexford.

ENVIRONMENTAL PROTECTION
AGENCY

12 AUG 2014

Re: Review of current Integrated Pollution Prevention and Control License.

Class and Nature of Activity: 6.1

The rearing of poultry in installations where the capacity exceeds 40,000 places.

Applicant: Mr Mr Nigel Flynn , c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

Location of Facility: Tiernahinch Far, Clones, Co Monaghan

Ref. No: P0926 - 02

EHIS Ref: 0192

Dear Ms Keavey,

Please find enclosed the Health Service Executive consultation report in relation to the above application.

If you have any queries regarding the report, the initial contact is Ms. Claire O'Dwyer, Acting Principal Environmental Health Officer.

The following HSE departments were made aware of the consultation request for the above application on 04/07/14:

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- RDPI

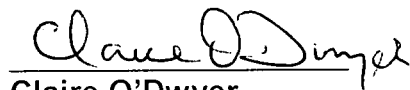
The Environmental Health service response to the application is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 31/07/14.
- Environmental Health was 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.
- No additional investigations / measurements were undertaken.
- 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;

Human Beings	Soil
Water	Air
Climatic Factors	Material Assets
Interaction of the above	Waste

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Claire O'Dwyer, Acting Principal Environmental Health Officer.

Yours sincerely,



Claire O'Dwyer
A/Principal Environmental Health Officer



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08 August 2014

Ms. Claire O'Dwyer
A/Principal Environmental Health Officer
Environmental Health Office
The Arcade
Main Street
Cavan
Co Cavan

Re: A review of an existing Integrated Pollution Prevention and Control License for a Proposed New Poultry Unit.

Class and Nature of Activity: 6.1

The rearing of poultry in installations where the capacity exceeds 40,000 places.

Applicant: Mr Nigel Flynn, c/o Mr Pdraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

Location of Facility: Tiernahinch, Clones, Co Monaghan

Ref. No: P0926 - 02

EHIS Ref: 0192

Dear Claire,

I refer to a review of an existing IPPC license for a poultry production unit belonging to the above named applicant. The IPPCL application for these units was submitted to the EPA on the 22 December 2010. There are currently 2 fully operational poultry houses to accommodate 69,000 broilers onsite. Rearing of chickens is carried out from day olds until removed off site for meat production.

The following are observations made whilst reviewing the said application and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during the site visit and discussions with Mr. Nigel Flynn on the 31 July 2014.

Manure

Currently all manure is collected by the contractor C.L.R. Co-op Ltd (T/A Poultry Manure Supplies) located at Mount Louise, Smithboro, Co Monaghan who removes the manure to be used in the manufacture of mushroom compost at various compost yards throughout the country. There is a suitable storage area for manure however no manure is currently stored on site. The current arrangement is to continue with the new development.

Soiled Water

Currently, soiled water is collected from the two existing houses in soiled water tanks located at the lower end of each poultry house. The soiled water from the yard wash down is collected in a soiled water tank beside the manure storage shed at the lower end of the yard. There is a natural fall and gully in the concrete yard which drains both soiled water during cleaning to the soiled water tank and clean surface water to a field drain. Both outlets are located beside the soiled water tank. When cleaning is in progress the clean surface water outlet is blocked off to allow soiled water to drain to the tank and visa versa when cleaning is complete the soiled water tank is blocked off to allow drainage of clean surface water to the field drain. The applicant stated that if the tanks are getting full he mixes the soiled water in the cattle slurry tank and it is spread on the family land surrounding the site in accordance with the Nitrates Directive and his nutrient management plan. There is however no high level monitors on the tanks. If the tanks were to overflow it may adversely affect the water quality in the water course directly to the north of the site.

It is recommended that all soiled water tanks including the tank associated with the new development have high level monitors installed.

In regard to the new development the applicant must be aware that the following applies 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.

Surface Water

Storm water and surface water is generated from roofs of the poultry units and yard respectively. Storm water is drained by natural means from the roofs of the existing poultry house and the proposed new development to a suitable stone drainage system and then to discharge points in a land drain. The surface water associated with the yard in front of the existing poultry houses is drained to a separate collection point and then discharged to a land drain. However, the means in which the surface water is drained to the collection point across the open concrete yard exposes the possibility of this surface water becoming contaminated particularly in circumstances where the chicken houses are being cleaned out during wet weather.

I would have concerns as to the cleanliness of the surface water emanating from the yard which is directed to this outlet, which is to the North of the site and flows in a westward direction to Tirnahinch Lough.

There is currently no surface water quality monitoring scheme in place to determine water quality at this discharge point or indeed any discharge point. The EIS report states that the new development will have no adverse impact on Tirnahinch Lough or its waters however this is impossible to determine as the discharge points are currently not tested to determine water quality.

It is recommended that a surface water quality monitoring scheme is put in place as per licence. Periodic water quality monitoring of relevant parameters as per licence.

Well

There is one deep bored well on the site. This well supplies drinking water to the applicants dwelling and family dwellings. It also supplies water to the existing poultry houses and will be used to supply water to the new development. The well water does not undergo any treatment process. Potable water supplies must comply with quality parameters of Drinking Water Regulations 2014.

As per the Batneec Guidance it is recommended that regular testing, at least once a year, of the water supply, is undertaken by the applicant.

It is also recommended that a groundwater protection plan be drawn up to address but not be limited to the following for wells used for human consumption:

- 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.

There has been some site works conducted around the well head. The applicant has informed me that he intends to cover the well head with a suitable manhole cover at ground level.

It is recommended that the applicant ensure that the manhole cover is above surrounding ground level to ensure surface water run off does not penetrate the well head and that the area is not prone to flooding.

Oil Storage Tank

The EIS states under **Pollutants and Waste (14.9)** that all fuels or chemicals kept on site will be stored in bunded containers. The current facilities for oil storage are not bunded. The oil tank is located in an area which has the potential to cause substantial pollution to ground water courses and to contaminate land if a leak should occur.

It is recommended therefore that the applicant is advised that in accordance with Batneec Guidance oil storage tanks on site should be placed on impervious bases and shall be located within oil tight bunds, capable of holding 110% of the volume of the largest tank within the bund. The fill and draw pipes shall be enclosed within the bund.

Waste

There is adequate storage facilities provided for the storage of dead bird carcasses on site. I was informed by the applicant that the carcasses are removed every three weeks, or more often if necessary, by Comagh Transport, Gortnaleck, Ballyconnell Co Cavan. This arrangement is to continue after the new facility commences.

Odour

In the **Non-Technical Summary (2.0)** part of the EIS it incorrectly states that the nearest dwelling, excluding family dwellings, is approximately 250m from the site and in the **Odour (9.2)** part of the EIS it conflictingly states that the nearest dwelling is 450m other than family dwellings. Non-family dwellings approximately 150m from the site were observed during the site visit. Batneec Guidance dictates that a distance of 400m is preferable from neighboring dwellings. The applicant stated that the persons living in these dwellings have not made any complaints regarding odour or noise nor has this office received any odour or noise complaints regarding this facility.

In addition the proposed new development is at a greater distance from the said dwellings than the existing poultry houses. Emissions to atmosphere from this farm include normal respiration gases and odours emitted from the houses and from the manure. Increased emissions may at times be associated with the loading of poultry manure from the existing poultry units and the proposed new development once every 6-8 weeks for around 4 hours per house. At the time of the site visit odour levels appeared acceptable for this type of farming activity.

It is recommended however that the applicant monitor odour closely particularly when the new development becomes active.

Noise

The site is located in a rural environment. B.A.T. specifies the standard noise emission limit values of 55 (daytime) and 45 (night time) dB(A) at any noise sensitive location. The applicant should be made aware of this in light of the proposed new development considering the close proximity of neighboring dwellings. This office has not received any noise complaints regarding this facility. At the time of the site visit noise levels appeared acceptable for this type of farming activity.

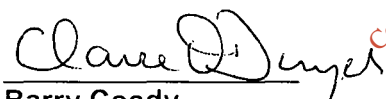
It is recommended however that the applicant monitor noise closely particularly when the new development becomes active.

Pest Control

Pest control measures are carried out by the applicant. A visual inspection of the bait boxes was carried out. The boxes were in good condition, well baited and located at regular intervals around the houses. Records of pest control measures are maintained by the applicant. The applicant plans to apply the same pest control measures to the new development.

It is recommended that the applicant continue to maintain records of the pest control measures for the new development.

Yours faithfully,



Barry Coady
Environmental Health Officer