



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Sub 2

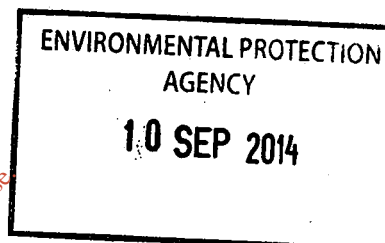
Environmental Health Service
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Ref/ BC/CO'D / EHIS Ref: 0213

08 September 2014

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



Re/ Application for an Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity/ Class 6.1

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

Applicant/ Mr. Gerard McGuinness, Ballagh, Threemilehouse, Co. Monaghan.

Ref. No/ P0998- 01

Dear Ms Kehoe,

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 05 August 2014:

- 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 in this case a screening report.
- A site visit was conducted on 03 September 2014.
- 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
Water
Climatic Factors
Interaction of the above

Soil
Air
Material Assets
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 September 2014

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

Re/ Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: 6.1

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

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

Location of Facility: Ballagh, Threemilehouse, Co. Monaghan.

Ref. No: P0998 - 01

EHIS Ref: 0213

Dear Claire,

I refer to an application for 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 31 July 2014. There are currently 3 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, screening report and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit and discussions with Mr. Gerard McGuinness on 03 September 2014.

Water Supply

There are no bored wells on site. Water for stock, washing and for the applicant's home is supplied by Corcaghan Water Group Scheme. This office is not aware of any issues concerning this water supply.

Soiled Water

Soiled water is collected and stored from the three poultry houses in soiled water tanks at the end of each poultry house located where A, B and C are marked on the site map (attachment B2). The applicant stated that when the tanks are reaching their capacity he empties the tanks and mixes the soiled water into the cattle slurry tank and it is then subsequently spread on the family land surrounding the site at the appropriate time of the year.

Even though the applicant has the manure removed from site by a contractor, George Coulson & Son Ltd., Clones, Co. Monaghan, for the purposes of mushroom cultivation, he still spreads soiled water from the poultry units on his land albeit diluted with cattle slurry.

Therefore, it is recommended, as this is the applicants first licence application, he is advised of Batneec Guidance Note Section **4.6 Spreading of poultry manure** and the conditions therein.

On the day of the site visit one of the soiled water tanks was full to capacity. The applicant stated he was planning to empty the tank that day. If any of the soiled water tanks particularly the soiled water tank attached to the poultry house marked C on the site map were to overflow due to heavy rain or otherwise, it may adversely affect the ground water quality in the water course at the lower end of the site where SW1 and SW2 are marked on the site map. There were no high level monitors fitted to the soiled water tanks at the time of the site visit.

It is recommended that all soiled water tanks have high level monitors installed to minimize the risk of unintentional overflow and that the applicant is accordingly advised to ensure that the tanks are emptied regularly and in any event certainly before full capacity is reached.

Surface Water

Storm water and surface water is drained by natural means from the roof and associated concrete yard, from the poultry house marked A on the site map, via a piped stone drainage system and discharged to a water course marked SW1 on the site map.

Storm water and surface water is drained by natural means from the roof and associated concrete yard, from the poultry house marked B on the site map, via a natural fall in the concrete yard to a gully collection point and discharged to a water course marked SW1 on the site map.

However, the means in which the storm water and surface water is drained from the roof and associated concrete yards at poultry house C, as marked on the site map, exposes the possibility of the surface water becoming contaminated. The drainage system currently in place for poultry house C involves the surface draining across an open yard directly in front of the soiled water tank area. The water then naturally drains through a hedge into the water course at the discharge point marked SW2 on the site map. The potential for contamination of the surface water may occur in circumstances where the poultry house is being cleaned out during wet weather or where there is soiled water runoff from the washing of the poultry house and discharged at SW1.

It is recommended that the applicant is advised to take all due care to ensure that soiled water does not contaminate the clean surface water particularly when cleaning is in progress. It is recommended that cleaning of poultry house C only takes place during dry weather to avoid the possibility of contamination. It is further recommended that the applicant is advised to take all due care when washing out poultry house C to ensure there is no soiled water runoff to the water course at the discharge point SW2.

Groundwater Quality Monitoring Scheme

There has been no sampling by the applicant of groundwater in the neighbourhood of the site to establish baseline conditions of groundwater quality.

It is recommended that the baseline conditions of the groundwater are established in the neighbourhood of the site and of the land spreading areas. Periodic water quality monitoring of relevant parameters as per licence, where appropriate, test wells should be provided at the site of the poultry unit.

Surface Water Quality Monitoring Scheme

There is currently no surface water quality monitoring scheme in place to determine water quality at the discharge points. The Screening report states that there is no adverse impact on Blackwater River catchment or its waters. This is impossible to determine as the discharge points are currently not monitored or sampled 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.

Nutrient Management Plan

A Nutrient Management Plan (NMP) should be maintained on site for the management of poultry manure and wash-water arising at the unit and should include:

- Calculation of the quantity of manure and the amount of nutrients available from manure including any manure or other wastes imported.
- The results of soil fertility and drainage tests on existing or proposed land spreading areas.
- A representative soil sample, to a depth of 10cm, should normally be taken biennially from every 2 to 4 hectares and at least one per farm. However, where soil types are similar and cropping and treatments of the lands were the same during the previous 5 years or more, a composite sample from an area up to 12 hectares is acceptable.
- An assessment of the relationships between manure application rates, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- Ordnance Survey Maps to a scale of 1:10,560 showing the location of the said land spreading areas and all environmentally sensitive features on the lands or in their vicinity; including *inter alia* dwellings houses and sensitive buildings, drains, streams, watercourses and other sources of water supply.
- Agreements between 'importers' and 'exporters' of all animal manures or other wastes are required.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

Oil Storage Tank

The current facilities for oil storage are not bunded. The oil tanks are located in an area which has the potential to cause substantial pollution to ground water courses and 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 two weeks, or more often if necessary, by College Proteins Ltd.

Odour

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 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.

The applicant stated that there have been no complaints regarding odour nor is this office aware of any odour complaints regarding this facility.

It is recommended that the applicant be advised to continue to monitor odour from the facility.

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 fact that this is his first application for a licence. This office is not aware of 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 that the applicant be advised to continue to monitor noise from this facility.

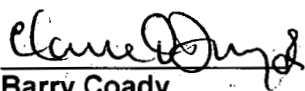
Pest Control

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 and located at regular intervals around the houses however, they were poorly baited. Records of pest control measures are not being maintained by the applicant.

It is recommended that the applicant ensures the bait boxes are monitored regularly to ensure an adequate amount of bait is present in the boxes and that pest control records of pest control measures are maintained on site.

Finally, as this is the applicant's first application for an IPPC licence, it is recommended that the applicant is made fully aware of his legal or otherwise responsibilities as per the ~~Batneec Guidance Note for the Poultry Production Sector~~ with particular emphasis on the prevention of pollution to the air, land and water from this facility.

Yours faithfully,


ff **Barry Coady**
Environmental Health Officer