



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
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Ref/ BC/CO'D / EHIS Ref: 0216

25 September 2014

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

Environmental Protection
Agency
26 SEP 2014

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 Mark McElvaney, Ballagh, Threemilehouse, Co. Monaghan.

Ref. No/ P0995- 01

Dear Ms Oglesby,

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 14 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 16 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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Ms. Claire O'Dwyer
A/Principal Environmental Health Officer
Environmental Health Office
The Arcade
Main Street
Cavan
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 Mark McElvaney c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

Location of Facility: Ballagh Threemilehouse, Co. Monaghan.

Ref. No: P0995- 01

EHIS Ref: 0216

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 14 July 2014. There are currently 3 fully operational poultry houses to accommodate 50,000 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 EIS and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit and discussions with Mr Mark McElvaney, on 16 September 2014.

Site Location

During the site visit the applicant advised that part of the site has the potential to flood during very heavy rain. The area in question is directly in front of the existing poultry house Marked No. 6 on the Site Layout Plan (Appendix No 2). This area encompasses the area in which the wash tank Marked No. 8 on the Site Layout Plan is located.

The applicant stated that he intends to remedy this issue by digging a number of field drains which would in turn divert flood waters away from the installation.

It is recommended that the applicant undertake this work without delay to avoid the serious potential of land, watercourse and groundwater contamination.

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 as listed in Appendix No. 4. There is currently no suitable storage area for manure on site however, the applicant stated, that no manure is stored on site.

The applicant stated, that the new proposed development will encompass a manure housing structure Marked No. 3 on the Site Layout Plan (Appendix No 2).

It is recommended, in terms of the new structure, that the applicant is advised to adhere with Section 4.5 of the Batneec Guidance Note for the Poultry Production Sector particularly S108: 'Minimum specification for manure pit', (DAFF, 1987) and to the legal required set out in S.I. 31 of 2014.

Water Supply

Well

There is one bored well on site. The applicant stated that the water from this well is used solely for the purpose of washing the poultry houses and associated yards. The well head is partially open to the elements, which creates the potential for contamination of the well and the groundwater therein. Currently, the applicant does not have the well tested nor is he aware of any ongoing issues with the groundwater in the area. It is unclear if the groundwater supplying this well is the source of supply for other wells in the area which maybe used for human consumption.

It is 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.

Other Water Supply

Water for stock and for the applicant's home is supplied by Stranooden Group Water Scheme. This office is not aware of any issues concerning this water supply. There is no indication in the EIS as to whether or not this water is tested.

It is recommended that in line with Bord Bia standards that this water supply is tested at least on an annual basis and records of same maintained on site by the applicant.

Wash Water

Wash water is collected and stored from the three existing poultry houses in wash water tanks. However, only two of these tanks are identified on the Site Layout Plan Marked as No. 8 (Appendix No 2). The wash water tank for the poultry house marked No. 2 on the Site Layout is not identified. The applicant stated that when the tanks are reaching their capacity he empties them 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. At the time of the site visit two of the wash tanks had reached their capacity and there were no high level monitors fitted to the soiled water tanks.

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

Even though the applicant has the manure removed from site by the contractor C.L.R. Co-op Ltd (T/A Poultry Manure Supplies) for the purposes of mushroom cultivation, the applicant still spreads soiled water from the poultry units on his land albeit diluted with cattle slurry.

It is recommended the applicant is advised of Batneec Guidance Note Section 4.6 and the conditions therein and to the legal requirements set out in S.I. 31 of 2014.

It states in the EIS that new wash tanks will be constructed, therefore:

It is further recommended that in regard to the new development the applicant is made 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

Storm water from the roofs of the 3 existing poultry houses is drained by guttering from the roofs to a stoned areas running parallel to all 3 poultry houses. The stone acts as a soak pit hence there is currently no artificial drainage system in place to drain storm water to a land drain.

Surface water from the concrete yards, Marked No. 14 on the Site Layout Plan (Appendix No 2), is drained by a natural fall in the concrete yards to a grassy area beside wash tank marked No 8 and directly in front of the existing poultry house Marked No. 6 on the Site Layout Plan. The surface water then soaks naturally into the ground in this area.

However, the means in which the surface water is drained from the associated concrete yards exposes the possibility of the surface water becoming contaminated. The potential for contamination of the surface water may occur in circumstances where the poultry houses are being emptied or cleaned out during wet weather or where there is wash water runoff from the washing of the poultry house. At the time of the site visit there was evidence to suggest that contaminated surface water is entering the grassy soak area beside wash tank marked No. 8 on the Site Layout Plan. Contaminated water is also accumulating beside Poultry house marked No. 7 on the Site Layout Plan as there is no drainage system in place at this location to accommodate separate wash water and surface water run off.

The concrete yards are in poor condition with substantial cracking evident. The applicant has stated that he has plans to renovate the yards, and pipe all clean surface water and contaminated surface water, to separate collection points. If this work was completed it would drastically reduce the risk of the surface water and subsequently watercourses / groundwater being potentially contaminated.

The main concern is the locally named 'Togan Lake' which lies directly behind poultry house Marked No. 7 on the Site Layout Plan. This lake is particularly vulnerable to any leakage of contaminants from the installation as it is located well below the ground level of the installation. This lake does not appear to be mentioned in the EIS or the Screening report.

It is recommended that separate collection of all uncontaminated surface water run-off from roofs and clean paved areas within the current and proposed installation and its direct disposal to field drains or soak pits is according to S129: 'Minimum specification for farmyard drainage, concrete yards and roads,' (DAFF, 1993).

Until the proposed work is complete it is recommended that the applicant is advised to take all due care to ensure that contaminated water does not contaminate the clean surface water particularly when loading the birds and when cleaning is in progress.

Until the proposed work is complete it is recommended that cleaning of poultry houses only takes place during dry weather to avoid the possibility of surface water contamination and subsequently watercourses / groundwater being potentially contaminated.

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 of the surface water run-off. The Screening report and the EIS states, that there is or will be no adverse impact on Blackwater River catchment or its waters. This is impossible to determine as the discharge areas are currently not monitored or sampled to determine surface 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

The applicant currently has no Nutrient Management Plan (NMP) in place.

It is recommended that 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.
- Ordinance 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 *interalia* 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.

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.

It is recommended that the applicant is advised that all dead birds are immediately stored in covered, leak proof containers following there death to avoid attracting unwanted pests.

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 strictly monitor odour from the facility in light of the fact that:

- The installation is increasing in size.
- That this is the applicant's first application for a licence.
- That the applicant's neighbours live in close proximity to the installation.

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 has not been made 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 strictly monitor noise from this facility in light of the fact that:

- The installation is increasing in size.
- That this is the applicant's first application for a licence.
- That the applicant's neighbours' live in close proximity to the installation.

Pest Control

Pest control measures are currently being 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. **Page 17 Section 2(1)(2) of the EIS** states that daily/weekly checks are recorded by the applicant. This however is not the case, records of pest control measures are not being maintained by the applicant. The applicant stated that pest control measures are to be taken over by an outside contractor.

It is recommended that the applicant ensures the bait boxes are monitored daily/weekly 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.


Observation.

The HSE were not included in the Scoping Assessment of this installation.

Conclusion.

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 and S.I. 31 of 2014, with particular emphasis on the prevention of pollution to the air, land and water from this installation. This report has highlighted a number of observations which have the potential to cause pollution of watercourses and groundwater. It is therefore strongly recommended that the applicant take immediate steps to substantially reduce this risk.

Yours faithfully,


PP Barry Coady
Environmental Health Officer