



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

SUR ①

Environmental Health Service
HSE Dublin/North East
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Ref/ BC/CO'D / EHIS.Ref: 0250

19 November 2014

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

ENVIRONMENTAL PROTECTION
AGENCY

21 NOV 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 Edwin Irwin, Killygavna, Tydavnet, Co. Monaghan.

Ref. No/ P1003- 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 10 September 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 the Appropriate Assessment Screening Report.
- A site visit was conducted on 10 November 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
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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 Edwin Irwin, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

Location of Facility: Killygavna, Tydavnet, Co. Monaghan.

Ref. No: P1003 - 01

EHIS Ref: 0250

Dear Claire,

I refer to an application for licence for a poultry production unit belonging to the above named applicant. The IPPCL application for these units was submitted to the EPA on the 17 October 2014. There are currently 3 fully operational poultry houses to accommodate 66,000 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 applicants EIS, appropriate assessment 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. Edwin Irwin on 10 November 2014.

Site Location

The site is approximately 100m from its nearest neighbour. The farm itself has been established for a considerable period of time. Although the neighbour is not involved in any farming activity he has made no complaints to the applicant nor is this department aware of any complaints. The applicant stated that he is always considerate of his neighbours in terms of noise and odour.

Manure

Currently all manure is collected by the contractor McCartney Contractors, Moynalty, Kells, Co Meath, who removes the manure to be used in the production of composting. There is a suitable storage area for manure on site, however the applicant stated that manure is never stored on site. The manure storage shed is capable of storing additional manure from the proposed units.

Water Supply

Well

There is one bored well on site. The applicant stated that the water from this well is used for the purpose of washing the poultry houses and associated yards. The well head is not adequately protected from possible contamination. The applicant stated that he does have the well tested in accordance with Bord Bia standards and he has stated that the water from the well is suitable for human consumption. 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.

Group Water Supply

Water for stock and for the applicant's home is supplied by Tydavnet 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 all potable water supplies are 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 three separate wash water tanks. The applicant stated that when the tanks are reaching their capacity he empties them and depending on the time of the year, he either mixes the wash water with the cattle slurry or spreads the wash water on the family land surrounding the installation. During the site visit it was noted that two of the wash water tanks were almost full to capacity. The applicant stated that he had planned to empty the tanks before the next clean out.

There were no high level monitors fitted to any of the wash water tanks. If any of the wash water tanks were to overflow it is highly likely that there may be serious contamination of surface and ground water due to the tanks close proximity to watercourses.

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

Even though the manure is removed from site by a contractor, the applicant still spreads wash water from the poultry units on his land.

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 proposed in the EIS that a new wash water tank will be constructed, therefore:

It is 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.

Storm Water from Roofs

Storm water from the roofs of the three existing poultry houses is drained by guttering from the roofs.

Poultry house 3, which is the largest of the three houses on the site layout plan, has a piped/stoned area running parallel to the house on both sides. The storm water from this house is discharged to a field drain. The discharge point is not identified on the site layout plan nor is it labeled on site. The storm water from the roofs of the other two houses is discharged directly from the guttering to a stoned area running parallel on each side of each house. There does not appear at this time to be any risk of the storm water becoming contaminated.

It is recommended that the applicant clearly identify using grid references and label all surface/storm water discharge points for the purpose of inspection and testing.

Surface Water

Surface water from the concrete aprons at the front of each poultry house is drained via a natural fall in the concrete aprons/yards to collection points and then discharged to field drains.

However, the means in which the surface water is drained from the associated concrete aprons/yards exposes the possibility of the surface water becoming contaminated.

During the site visit it was noted that there was visual evidence of clean surface water contamination occurring. Traces of poultry manure were evident on the grills covering the clean surface water collection points. There was also what appeared to be contaminated surface water flowing down from the farm yard above the largest poultry house and entering the clean surface water collection point directly in front of this house. It is probable that the level of contamination escalates during wet weather.

The potential for further contamination of the clean 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 into

the clean surface water collection points. The applicant acknowledged the evidence of contamination and the potential risk of more serious contamination.

The main concern is the watercourse Killygavna Stream a tributary of the Mountain Water which ultimately flows to the River Blackwater which is located in the Neagh Bann International River Basin District. As stated in the EIS all surface/storm water flows southwest towards this watercourse.

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).

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.

It is recommended that cleaning of poultry houses, where possible, only takes place during dry weather to avoid the possibility of surface water and subsequently watercourses / groundwater being potentially contaminated.

It is recommended that the applicant is advised to take immediate measures to prevent contaminated surface water from his dairy farm entering the clean surface water collection points and subsequently discharging to a watercourse.

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 appropriate assessment screening report states, that there is or will be no adverse impact on the adjoining water courses or catchments. 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.

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.

Oil Storage Tank

The current facilities for oil/fuel storage on site are not banded.

It is recommended 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.

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 *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.

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 after every crop by College Proteins Ltd.

It is recommended that the dead bird carcasses are removed more frequently to avoid the dead birds decomposing to an extent whereby it may cause odour issues and/or attracted unwanted pests such as flies.

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.

The applicant stated that there have been no complaints regarding odour nor is this office aware of any odour complaints regarding this installation. At the time of the site visit odour levels appeared acceptable for this type of farming activity. It is not envisaged that any increase in production will cause any significant issues regarding odour.

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.

The applicant stated that there have been no complaints regarding noise nor is this office aware of any noise complaints regarding this installation. At the time of the site visit noise levels appeared acceptable for this type of farming activity. It is not envisaged that any increase in production will cause any significant issues regarding noise.

Pest Control

Pest control is carried out on site by the contractor ECOLAB. A visual inspection of the bait boxes was carried out. The boxes were in good condition and located at regular intervals around the houses. Records of pest control measures are maintained by the applicant.

Observation

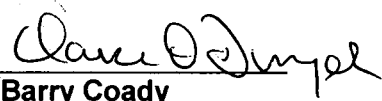
It was very difficult to examine the site layout plan Appendix No. 2 in the EIS, as the details were very small and impossible in some instances to read.

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 is advised to take immediate steps to substantially reduce this risk.

Yours faithfully,

PP 
Barry Coady
Environmental Health Officer

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