



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

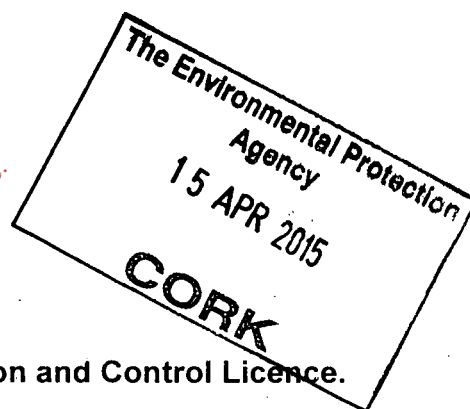
Environmental Health Service  
HSE Dublin/North East  
Cavan and Monaghan  
The Arcade  
Main Street  
Cavan  
Co Cavan

Tel No: +353 (0) 49 4373418  
Fax No: +353 (0) 49 4373427

Ref/ BC/CO'D/ EHIS Ref: 0302

10 April 2015

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



Re/ Review of current 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: Andrew Keating, Glear, Newbliss, Co Monaghan.

Ref. No/ P1012-01

Dear Ms McDonnell,

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 09 March 2015:

- 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 conducted on 13 March 2015.
- 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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Fax: 049 4373427

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

**Re: Review of a 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: Andrew Keating, c/o Traynor Environmental Ltd. Belturbet Business Park, Creeny, Belturbet, Co. Cavan.**

**Location of Facility: Aghareagh, Newbliss, Co. Monaghan.**

**Ref. No: P1012 - 01**

**EHIS Ref: 0302**

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 25 February 2015. There are currently 2 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 said application and related documents in conjunction with EPA guidance documents and associated legislation. Further observations were made during a site visit and discussions with Mr. Andrew Keating on 13 March 2015.

### **Site Location**

The nearest neighbour is located within approximately 100m of the site. This is not in line with Section 4.3 of the Batneec Guidance Note for the Poultry Production Sector. It was established however that both the poultry site and the nearest neighbour have been living side by side for a long number of years without any issues or complaints arising. (Please see the parts of this report dealing with Noise and Odour)

### **Manure:**

Currently all manure is collected by the contractor Legnakelly Transport Ltd who removes the manure from the houses. There is no indication in the application as to what the manure is used for once removed from site. No Manure is stored on site however suitable off site facilities are available to accommodate manure storage if required.

### **Storm Water / Surface Water:**

Storm water is drained from the roofs of the 2 existing poultry houses to a stoned soak pit system running parallel on both sides of each house. According to the applicant there have been no incidences of flooding nor is there a history of flooding in the area.

Clean Surface water is generated from the concrete yards directly in front and to the rear of the 2 existing poultry houses. In regard to the front concrete yard, clean surface water drains via a natural fall to a collection tank beside poultry house No. 2 as identified by the applicant and then discharged via a land drain.

During the site visit however, it was noted that the clean water collection tank appeared to be contaminated with traces of poultry manure. There was visual evidence which indicated that quantities of soiled water are entering the tank and being discharged to a land drain. The applicant acknowledged the presence of what appeared to be soiled water and quantities of manure in the collection tank. If this is the case, then there is the potential for the pollution of water courses connected to this land drain. The applicant acknowledged that the issue arises during destocking where the concrete yards become contaminated with manure and in the process of the yard being cleaned soiled water inadvertently enters the clean surface collection tank.

There is currently no surface water quality monitoring scheme in place to determine water quality at the discharge points. During the site visit it was further determined that the discharge points were not labeled by the applicant nor was the applicant able to determine where the actual discharge points were located. Therefore no records are being maintained by the applicant to demonstrate that discharge points are being monitored.

**It is recommended that a condition of the licence stipulate that a surface water quality monitoring scheme is put in place and that the baseline conditions of the groundwater are established in the neighbourhood of the site and of the land spreading areas. That periodic water quality monitoring is established of the relevant parameters and that relevant records are maintained by the applicant for inspection.**

**Washwater:**

When cleaning is in progress the washwater is directed towards two washwater tanks directly outside the doors to the rear of both poultry houses.

The washwater tanks accommodate washwater generated from both poultry houses. During the site visit the capacity of both washwater tanks undetermined.

To the rear of poultry house No.2. visual evidence indicates that soiled washwater appears to be directly entering the water course at this location. According to the applicant this issue arises during clean out of poultry house No. 2. Where manure and soiled water inadvertently over shoots the washwater tank and drains to the land drain to the rear of the concrete yard.

**It is recommended that 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.**

As there is a water course to the rear of the facility, both washwater tanks have the potential to cause pollution if either of them overflow.

**It is recommended that a condition of the licence stipulate the applicant fit high level indicators to all washwater tanks.**

The applicant stated that he empties the washwater tank regularly and mixes the soiled water in the cattle slurry tank to ensure no overflow occurs. When conditions are suitable he also spreads the washwater on the family land surrounding the site in accordance with the Nitrates Directive.

The applicant however currently has no Nutrient Management Plan in place.

**It is recommended that a condition of the licence stipulate that a Nutrient Management Plan (NMP) should be maintained by the applicant 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.

It is recommended that a condition of the licence stipulate that the Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

It is further recommended that the applicant is advised of Batneec Guidance Note Section 4.6 Spreading of Poultry Manure and the conditions therein.

#### **Water Supply:**

The existing poultry houses and the applicant's home are supplied with drinking water from Drumgole Group Water Scheme. The applicant stated that the water is tested regularly and has been, to date, satisfactory. This office is not aware of any existing issues with this water supply.

There is one deep bored well on the installation. According to the applicant the well is currently not being used but may in the future be used to supply water to the installation.

The well head is particularly vulnerable to contamination as it is not adequately protected from wildlife or the possibility of surface water contamination. The ground directly surrounding the well head is being maintained in poor condition. The well has not been tested recently nor was any previous test results available for inspection.

Contamination of this water course may have the effect of contaminating other sources of drinking water to wells in neighbouring properties.

It is recommended that a condition of the licence stipulate that a groundwater protection plan be drawn up by the applicant 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.

#### **Oil Storage Tank:**

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 contaminate land if a leak should occur.

It is recommended that a condition of the licence stipulate that the applicant, in accordance with Batneec Guidance, should have all oil storage tanks on site placed on impervious bases and should be located within oil tight bunds, capable of holding 110% of the volume of the largest tank within the bund. That fill and draw pipes should be enclosed within the bund.

#### **Waste:**

There is adequate storage facilities provided for the storage of dead bird carcasses and other waste on site. The application identifies College Proteins as the company responsible for removal of dead birds from the facility and this was confirmed by the applicant. According to the applicant the bins are emptied every fortnight or more regularly if required.

It is recommended that a condition of the licence stipulate that the applicant effectively manage waste on site at all times.

#### **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 once every 6-8 weeks for around 4 hours per house. This office is not aware of any odour complaints nor has the applicant received any complaints regarding this installation. At the time of the site visit odour levels appeared acceptable for this type of farming activity.

It is recommended that a condition of the licence stipulate that the applicant effectively manage odour on site at all times but particularly during destocking and during the cleaning process.

#### **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. This office is not aware of any noise complaints nor has the applicant received any complaints regarding this installation. At the time of the site visit noise levels appeared acceptable for this type of farming activity.



**It is recommended that a condition of the licence stipulate that the applicant effectively manage noise level on site at all times but particularly during destocking and during the cleaning process.**

**Pest Control:**

Pest control measures are undertaken by a pest control contractor namely Mr Eugene Slowley from Pest Proof Ltd. The bait boxes were in good condition and located at regular intervals around the external perimeter of the 2 existing poultry houses. The applicant also undertakes daily and weekly checks of the bait boxes and monitors the poultry houses internally for any indications of rodents.

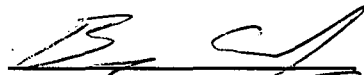
**It is recommended that a condition of the licence place an obligation on the applicant to maintain adequate vermin control measures and maintain all pest control records at the installation.**

**Conclusion:**

The issues raised in this report highlight some potentially serious issues. Of particular concern to the Health Service Executive are the issues raised in terms of the potential for water pollution.

It is therefore recommended that the applicant is fully advised of his obligations within the licence and the Batneec Guidance Note for Poultry Production and that corrective action by the applicant is immediately undertaken to prevent any potential incidents of water pollution.

Yours faithfully,



**Barry Coady**  
**Environmental Health Officer**

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