



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

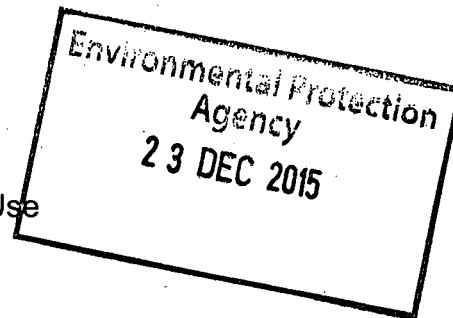
Environmental Health Service
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Ref/ BC/CO'D / EHIS Ref: 0403

18 December 2015

Ms Liz Leacy
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. Stephen Hall, Lattacapple, Cootehill, Co. Cavan.

Ref. No/ P1034 - 01

Dear Ms Leacy,

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, Principal Environmental Health Officer.

The following HSE departments were made aware of the consultation request for the above application on 11 December 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 in this case the Environmental Impact Assessment.
- A site visit was conducted on 16 December 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, Principal Environmental Health Officer.

Yours sincerely,



Claire O'Dwyer
Principal Environmental Health Officer



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18 December 2015

Ms. Claire O'Dwyer
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. Stephen Hall, c/o C.L.W. Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

Location of Facility: Lattacapple, Cootehill, Co. Cavan.

Ref. No: P1034 - 01

EHIS Ref: 0403

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 18 November 2015. There is currently 1 fully operational poultry houses to accommodate 36,000 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. Stephen Hall on 16 December 2015.

Site Location

The site is approximately 100m from its nearest non-family 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 no suitable storage area for manure on site, however the applicant stated that manure is never stored on site. This may become an issue where for example there is an outbreak of disease on site and the applicant is instructed not to remove any manure off site.

Water Supply

There is one bored well on site however this well is unusable due to the collapse of the liners. There is no plan to re-commission this well in the near future.

Water for stock and for the applicant's home is supplied by Bunnoe Group Water Scheme. This office is not aware of any issues concerning this water supply. However 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 existing poultry house in a wash water tank to the rear of the existing poultry house. 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.

There was no high level monitor fitted to the wash water tank. If the wash water tank was 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 existing and proposed wash water tanks have high level monitors installed to minimise 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 existing and proposed poultry houses is drained by guttering from the roofs. The storm water from this house is drained from the houses by gullies and stoned areas running parallel on each side of each house and discharged to a field drain to the rear of the both houses. The discharge point is not identified on the site layout plan nor is it labelled on site. 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 labelling of all surface/storm water discharge points for the purpose of inspection and testing.

Surface Water

Clean Surface water from the concrete apron to the front of the existing poultry house is drained via a natural fall in the concrete apron/yard to collection points and then discharged to a field drain.

However, the means in which the surface water is drained from the concrete apron/yard exposes the possibility of the clean surface water becoming contaminated.

During the site visit it was noted that there was visual evidence of clean surface water contamination occurring. Substantial traces of poultry manure were evident on the concrete apron which had the potential to be washed down to the field drain discharge point during rainfall. It is probable that the level of contamination escalates during prolonged spells 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 stated the he proposes to deal with this issue when the second wash water tank is installed at the proposed poultry house.

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 and that all contaminated surface water is directed to the wash water tanks. It is also recommended that the applicant maintain the concrete apron in a clean, manure free condition at all other times.

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.

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 EIS 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.

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 fortnightly or more often if necessary by contractor Michael Galligan, Gortnaleck, Ballyconnell, Co Cavan and not by College Proteins Ltd as stated in the EIS.

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 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.

It is recommended that the applicant continue to monitor closely pest control measures around the existing and proposed units.

Observation

It was very difficult to examine Appendices No. 1 - 4 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,


Barry Coady
Environmental Health Officer