

Subw no 1

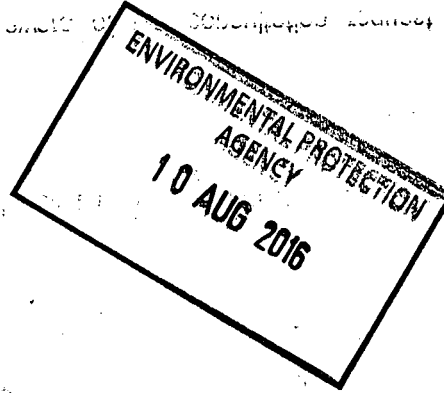


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service,
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08.08.16

Ms. Liz Leacy
Programme Officer
Environmental Licensing Programme
Office of Environmental Sustainability
EPA Headquarters
PO Box 3000
Johnstown Castle Estate,
County Wexford



Our ref: 0497

Licence Ref: P1042-01

Applicant: Mr. Michael Noel O'Connor

Location: Rathcahill West, Templeglantine, Co. Limerick

Class & Nature of the Activity: 6.1(a) The rearing of poultry in installations where the capacity exceeds 40,000 places.

Dear Madam,

Please find enclosed the HSE consultation report in relation to the above licence application.

If you have any queries regarding any of these reports, the initial contact is Mr. Andrew Curtin, Principal Environmental Health Officer, who will refer to an appropriate person in the responsible department.

The following HSE departments were made aware of the consultation request for the proposed development:

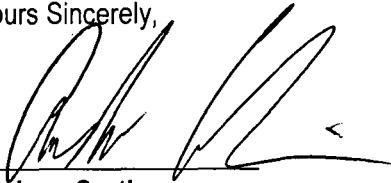
- Emergency Planning – Paschal Diviney
- Estates – Helen Maher, Estates Manager – Environmental Services
- Assistant National Director for Health Protection – Kevin Kelleher / Marie Woods
- RDPI – Matt Hurley

Environmental Health Report

The EH service response to the proposal is in the attached consultation report:

- The assessment is based on an assessment of documentation submitted to this office.
- This report refers only to those sections of the documents which are relevant to the HSE.

Yours Sincerely,



Andrew Curtin
Principal environmental Health Officer

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HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000 & Regs made thereunder).)

Report to: Environmental Protection Agency

Type of consultation: Industrial Emissions Activity Licence ✓
Planning Authority: Limerick City & County Council
Reference Number: P1042-01
Applicant: Mr. Michael Noel O'Connor
Location: Rathcahill West, Templeglantine, Co. Limerick
Our ref: 0497

Class & Nature of the Activity: 6.1(a): The rearing of poultry in installations where the capacity exceeds 40,000 places.

Note:

This report only comments on Environmental Health (EH) Impacts of the proposed development as outlined in this EIS and the adequacy of the EIS from an EH viewpoint.

Introduction:

The application refers to an operation which was granted planning permission under planning ref 12/283 & 13/366 which would for the construction of two additional poultry houses as well as the installation of a low pressure ventilation system. The following are observations made whilst reviewing the said application, EIS and related documents in conjunction with EPA guidance documents and associated Legislation.

The EIS submitted was the same document submitted in support of the 2012 & 2013 planning applications. Many aspects of the EIS have not been updated, despite the units now being fully operational. The EIS is general in nature e.g. no actual figures are given under the heading Description of Baseline Air Quality and in 5.5 Mitigation Measures, a general statement is made that 'all efforts will be made to ensure no dusting occurs'.

Waste management

Currently all manure is collected by Custom Compost (Gorey, Co. Wexford), who remove the manure from the houses and deliver it to mushroom composting facilities or crop growers. Litter is removed immediately as the houses are being cleaned.

Soiled Water

Currently, soiled water from the three existing houses is contained in one tank and is utilised on the Applicant's land. This amounts to 5 vacuum tanks per year, according to the Non-Technical Summary. However, this amount is not quantified in litres in *Chapter 9 - Aquatic Environment*. Apart from spillages, the impact on the water quality of the operational phase of the unit has not been examined in this chapter.

Surface Water

Surface water is generated from the roofs of the poultry units and the surrounding yards from the existing units to discharge into an adjacent drainage ditch. The impact on this drainage ditch is not addressed in the EIS. No monitoring records are provided either pre or post discharge point.

It is recommended that Rain water harvesting be explored and utilized by these types of developments where appropriate.

Water supply

The unit is supplied with water from an on-site deep bore well, with back-up from the public water supply. The EIS states "there has been no known historical contamination of groundwater at this site". There was no sampling results/info in the EIS or application to verify this statement. It is recommended that the well water or other groundwater test results be included with such applications to substantiate such statements.

Chemicals

Chemicals are stored in a bunded container in a designated store.

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 8-10 weeks for approximately 4 hours. This office has not received any odour complaints regarding this facility. At the time of the site visit odour levels appeared acceptable for this type of farming activity.

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 has not received any noise complaints regarding this facility. At the time of the site visit noise levels appeared acceptable for this type of farming activity.

Receptors

As highlighted by this office at the planning stage, the *EPA Guidance Note for the Intensive Agricultural Sector* sets out a distance radius of 400m from habitable residences to be maintained. However, the Applicant's dwelling house lies within 25 metres of the poultry houses, while three more residential properties are located within 85 metres. These are also arguably downwind of the prevailing south-westerly winds and as the units have already been constructed, mitigation against possible foul odours and noise are particularly necessary. Having consulted with the Environment Section of Limerick City and County Council, there have been no complaints to date regarding odour, air quality or noise nuisance from the applicant's unit.

Consultation

The EIS refers to the odour management plan submitted at planning stage to Limerick City & County Council. While the EIS author states that Mr. O'Connor has received no complaints about odour in relation to the existing poultry houses, no public consultation has taken place in relation to the facility – local residents have not been spoken to or consulted by the author – as is intended in the *EPA Guidelines on Information to be Contained in Environmental Impact Statements*. Given the close proximity not just to the nearby residences, but also to the village of Templeglantine, public consultation is an imperative.

Pest Control

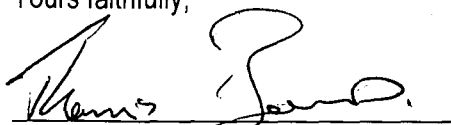
Pest control is not mentioned in the EIS.

Cumulative Impacts

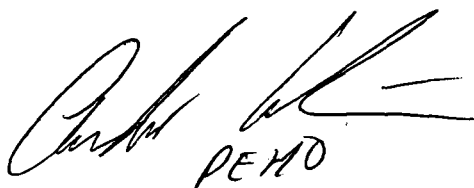
There are no significant industrial activities in close proximity to this plant.

Should you wish to discuss this report, please do not hesitate to contact this office at the above address/numbers.

Yours faithfully,



Thomas Boland
Environmental Health Officer



PEHO