



Féidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

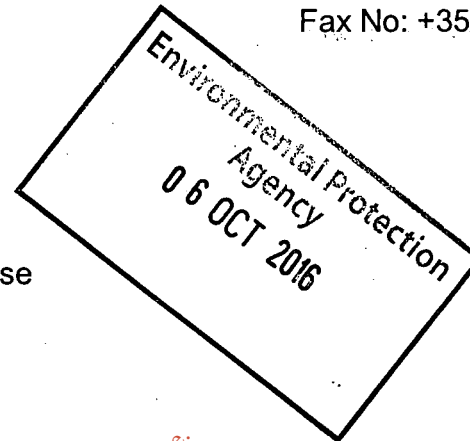
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Ref/ BC/CO'D/ EHIS Ref: 0511

30 September 2016

Ms Noeleen Keavey
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 Andrew Mackarel, Latgallan, Stonebridge, Clones, Co. Monaghan.

Ref. No/ P1043 - 01

Dear Ms Keavey,

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 01 October 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 28 September 2016.
- 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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30 September 2016

Ms. Claire O'Dwyer
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 Andrew Mackarel, c/o Traynor Environmental Ltd, Belturbet Business Park, Greeny, Belturbet, County Cavan,

Location of Facility: Latgallan, Stonebridge, Clones, Co. Monaghan.

Ref. No: P1043 - 01 EHIS Ref: 0511

Dear Claire,

I refer to the submission of an application for an Industrial Emissions License to the EPA for poultry production units from Mr Andrew Mackarel, Latgallan, Stonebridge, Clones, Co. Monaghan. .

The licence application for these units was received by the EPA on the 24 August 2016 and following a review of the EIS submitted by the applicant, the Environmental Health Service conducted a site visit on 28 September 2016.

There are currently 3 fully operational poultry houses to accommodate 64,000 broilers onsite. Rearing of chickens is carried out from day olds until removed off site for meat production. One of the houses has been newly constructed and there are plans to extend one of the other existing houses following planning permission from Monaghan County Council to do so.

The following are observations made whilst reviewing the said 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. Mackarel on 28 September 2016.

Water Supply:

There are two deep bored wells located on the installation one of which currently supplies the existing poultry houses and the applicant's home with drinking water from and the other well is only used as a back-up supply. The well heads are suitably protected and there does not appear to be any risk of contamination from surface water. This office is not aware of existing issues with this water supply.

It is recommended that the applicant have both wells tested regularly and that 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.**

Surface Water / Storm Water / Soiled Water

All surface water from the yards are drained via a piped drainage system and discharged to the County Councils road drainage system which is eventually drained to a land drain. The storm water from the roofs are drained via a piped system to field drains. There is no risk of flooding on this site. The yards are all concreted and are maintained in excellent condition. There is a system in place to separate clean surface/storm water and soiled water during wash down and there was no evidence, during the site visit, to indicate that soiled water was entering the clean surface water drainage system.

There is currently no surface water quality monitoring scheme in place to determine water quality at the discharge points.

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.

The surface or storm water discharge points are not identified in the EIS or on site.

It is recommended that the applicant clearly identify and label all discharge points for the purpose of inspection and sampling.

Wash Water Tanks

As there is a water course nearby to the facility, the wash water tanks have the potential to cause pollution if they overflow.

It is recommended that a condition of the licence stipulate the applicant fit high level indicators to all wash water 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. It is subsequently spread on the family land surrounding the site in accordance with the Nitrates Directive however, the applicant currently has no Nutrient Management Plan in place.

It is recommended 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.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

Manure:

Currently all manure is collected by the contractor CLR Co-op Ltd who removes the manure from the houses for the purpose of mushroom cultivation at various locations. No Manure is stored on site although suitable facilities exist to accommodate manure storage.

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

Waste

Waste is recycled where possible and otherwise disposed of correctly.

Dead birds are stored in suitable containers and collected by Irish Bait & Tackle Ltd, Ballyconnell, Co Cavan, at 1-2 weekly intervals.

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. It is not envisaged that there will be any significant increase in noise levels from the facility following the expansion. To date this office has not received any noise complaints regarding this facility. At the time of the site visit noise levels appeared acceptable.

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

Receptors

There is neighbouring dwelling house within 400m of this site as states in the Non – Technical Summary of the EIS. However the applicant has stated that there have been no complaints.

Pest Control

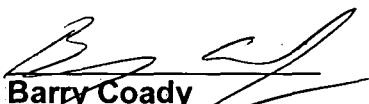
Pest control is carried out by a contractor named Eco Lab, Clonee, Co Meath. A visual inspection of the bait boxes was carried out. The boxes were in good condition and well baited and located at regular intervals around the site. Records of pest control measures are being maintained by the applicant.

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 facility is operated in a very efficient manner by the applicant. Other than the issues stated above, the HSE have no further concerns at this time regarding this facility.

Yours faithfully,


Barry Coady
Environmental Health Officer