Sub. No 1.



Environmental Health Service
HSE Dublin/North East
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Ref/ BC/CO'D/ EHIS Ref: 0559

14 February 2017

Ms Dorota Richards
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: Hatchery

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. Fergal McEntee, Knockaturly, Monaghan, Co. Monaghan.

Ref. No/ P1050 - 01

Dear Ms Richards,

Please find enclosed the Health Service Executive consultation report in relation to the above application.

The following HSE departments were made aware of the consultation request for the above application on 12 January 2017:

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- RDP!

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 was conducted on 10 February 2017.
- 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 HSF.
- 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 Dwyer, Principal Environmental Health Officer.

Yours sincerely,

Claire O'Dwyer

Principal Environmental Health Officer



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Tel: 049 4373418 Fax: 049 4373427

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Co. Cavan

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

Re/ Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: Hatchery. The rearing of poultry in installations where the capacity exceeds 40,000 places.

Applicant: Fergal McEntee, c/o Mr Padraic Fave CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan, Co. Cavan,

Location of Facility: Knockaturly, Monaghan, Co. Monaghan.

Ref. No: P1050 - 01

EHIS Ref: 0559

Dear Claire,

I refer to the submission of an application for an Industrial Emissions License to the EPA for poultry production units from Fergal McEntee, Knockaturly, Monaghan, Co.

The licence application for these units was received by the EPA on the 06 January 2017 and following a review of the EIS submitted by the applicant, the Environmental Health Service conducted a site visit on 10 February 2017 where contact was made with Mr Fergal McEntee.

There are currently 2 fully operational hatchery units on site with a capacity to accommodate 39,000 birds onsite. The current and proposed operation involves the housing of laying hens in enriched cages from 16 weeks old over a period of 62 weeks at which time the stock will be replenished. It is proposed to newly construct one additional unit following planning permission from Monaghan County Council to do so to bring overall capacity to 72,000 birds.

The following are observations made during the site visit and whilst reviewing the said EIS and related documents in conjunction with EPA guidance documents and associated Legislation.

Receptors

There is no neighboring dwelling house within 100m of this site and the applicant has stated that there have been no complaints to date and this office has not been made aware of any complaints.

Water Supply:

The installation is supplied by Stranooden group water scheme. The EIS does not mention this water supply and only refers to a proposed bore well. The applicant has stated that the current water supply is tested regularly as per the Bord Bia requirements.

It is recommended that the applicant have the proposed bore well tested regularly and 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.

Surface Water & Storm Water

All clean surface water from the yards and the storm water from the roofs are drained via a piped drainage system and discharged via two land drain approximately 20 meters from the installation. There is no risk of flooding as the installation is located on an elevated site. There was no evidence during the site visit to suggest that the clean surface water or storm water was being contaminated by soiled water.

There is however 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. This is particularly important when considering the significant increase in production.

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

It is recommended that the applicant clearly identify and label including grid references all current and proposed discharge points for the purpose of inspection and sampling.

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. This is particularly important when considering the significant increase in production.

Soiled Water / Litter & Wash Water Tanks

Soiled water is washed in to the soiled water tanks during clean down via an in-house drainage system and there was no evidence, at the time of the visit, to indicate that soiled water was entering the clean surface water drainage system. Litter is removed from the units by a cleaning system which uses an enclosed conveyor to transfer soiled litter from the units to a covered and walled manure pit. This significantly reduces any possibility of contamination of the clean water system. The manure pit appears to be suitable constructed to store such material and no evidence of leakage was detacted at the time of the visit. The manure is removed from the manure pit by McCartney Contractors Ltd.

As there will be a significant increase in manure production it is recommended that the manure pit is monitored regularly for over fill and increased in odour.

Although there is no water course directly beside the wash water tank there is the potential for overflow as there is no high level indicator on the tank.

It is recommended that a condition of the licence stipulate the applicant fit high level indicators to all current and proposed wash water tanks to help reduce any risk of contamination.

The applicant stated that he empties the wash water tank regularly and mixes the soiled water in the cattle slurry tank to ensure no everflow 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, given the significant increase in production, 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 *interalia* 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.

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

The applicant is proposing to construct an additional wash water tank to facilitate the new poultry unit.

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.

Waste

Dead birds are stored in suitable containers and collected by College Proteins, Nobber, Co Meath at 1–2 weekly intervals or more often if necessary.

How other waste is disposed of is not identified in the EIS.

It is recommended that the applicant document and keep records of where all waste is disposed of.

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 and de-stocking. 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. There will however be increased activity at this facility when the new poultry houses are operational.

It is recommended that a condition of the licence stipulate that the applicant effectively manage odour on site at all times but particularly during de-stocking, during cleaning process and manure removal.

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. There will however be increased activity at this facility when the new poultry houses are operational particularly during the construction phase.

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

Pest Control

The EIS states that pest control measures on site are maintained and administered by the applicant. However the applicant has stated that Felix Pest Control Ltd manage all pest control issues at the installation. A visual inspection of the bait boxes was carried out and found to be well baited with bait boxes located at regular intervals.

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 and that these measures and controls are extended to the proposed new development.

Oil Storage Tank:

There are currently no oil storage facilities on site.

Conclusion:

The facility is very modern and 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