

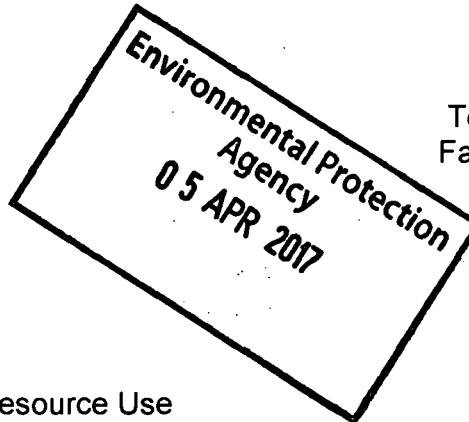


Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
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Ref/ BC/CO'D/ EHIS Ref: 0581

03 April 2017

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: M.A.G. World Ltd, Drumeague, Bailieboro, Co. Cavan.

Ref. No/ P1053 - 01

Dear Ms Keavey,

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 03 March 2017:

- 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 was conducted on 30 March 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 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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03 April 2017

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: M.A.G. World Ltd, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan, Co. Cavan.

Location of Facility: Drumeague, Bailieboro, Co. Cavan.

Ref. No: P1053 - 01

EHIS Ref: 0581

Dear Claire,

I refer to the submission of an application for an Industrial Emissions License to the EPA for poultry production units from M.A.G. World Ltd, Drumeague, Bailieboro, Co. Cavan.

The licence application for these units was received by the EPA on the 02 March 2017 and following a review of the EIS submitted by the applicant, the Environmental Health Service conducted a site visit on 30 March 2017 where contact was made with Mr Kenneth Hall.

There are currently 2 fully operational free range broiler houses on site with a capacity to accommodate 28,000 broilers onsite. Rearing of chickens is carried out from day olds until removed off site for meat production. It is proposed to newly construct one additional broiler house following planning permission from Cavan County Council to bring overall capacity to 60,000 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 neighbouring dwelling within 400m of this site. 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:

There is one deep bored well located at the applicants house adjacent to the installation which currently supplies the existing poultry houses and the applicants dwelling with drinking water. The well head is suitably protected and there does not appear to be any risk of contamination from surface water. This office is not aware of any existing issues with this water supply. The applicant has stated that the well water is tested regularly by Agri Health however no test results were kept on site. It was noted that the bore well, as indicated in Appendix 2, is incorrectly located on the map.

It is recommended that the applicant have the well tested regularly and the results of those tests are maintained on site for inspection. 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 running on each side of the two existing poultry houses and discharged to a single land drain approximately 100 meters from the installation. The discharge point is to a field drain which flows towards a tributary of the Annalee River and onwards to the River Erne. There was no evidence during the site visit to suggest that the clean surface water or storm water was being contaminated by soiled water and there is no risk of flooding as the installation is located on an elevated site.

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

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 for the existing two poultry houses is not identified in the EIS or on site.

It is recommended that the applicant clearly identify and label 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 & Wash Water Tanks

Soiled water is washed in to the soiled water tanks during clean down of the two existing poultry houses. Each house has its own dedicated tank and there was no evidence, at the time of the visit, to indicate that soiled water was entering the clean surface water drainage system. However, both tanks were full at the time of the visit.

It is recommended that the applicants licence clearly stipulates that all precautions are taken, particularly during wash down and wet weather, to avoid the tanks overflowing which may result in the contamination of ground water.

It is further 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 normally he empties the wash water tank regularly and spreads the wash water on his adjoining land or empties the soiled water into 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, 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 house.

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.

Manure:

Currently all manure/litter is collected by the contractor McCartney Contractors Ltd., Moynalty, Kells, Co Meath, who removes the manure from the houses to the compost yards/recipient farmers. No Manure is stored on site as there are no suitable facilities to accommodate manure storage.

Waste

Waste is recycled where possible and otherwise disposed of correctly at Cavan County Council Civic Amenity Centre and or returned to the supplier.

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

It is recommended that the applicant ensures that the dead bird storage containers are emptied regularly and in any event before they overflow. With the potential increase in dead birds due to increase in production it is recommended that the applicant increase the number of containers used to store dead birds. Suitable storage conditions avoids pests being attracted to the facility.

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. There will however be increased activity at this facility when the new poultry house is 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 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. There will however be increased activity at this facility when the new poultry house is 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

Pest control measures on site are maintained and administered by the applicant. A visual inspection of the bait boxes was carried out. The bait boxes were in good condition and suitably located.

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:

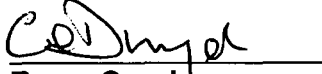
The current facilities for oil storage are not bunded. The oil tanks, located at broiler house No. 1 and No. 2, are located in an area which has the potential to cause substantial pollution to ground water courses and contaminate land if a leak were to occur. The applicant stated that the tanks are rarely used and generally are empty most of the year as the facility has converted to Gas as a source of fuel for heating.

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, which contain oil, are 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. It is further recommended that the applicant take all precautions during the construction to ensure that all filling of fuel is done in an area in which it can be detained if a spill were to occur.

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,

RP 
Barry Coady
Environmental Health Officer

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