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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Service  
HSE Dublin/North East  
Cavan and Monaghan  
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Ref/ BG/CO'D/ EHIS Ref: 0587

07 April 2017

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: Graeme Reid, Aghaboy, Glaslough, Co. Monaghan.

Ref. No/ P1054 - 01

Dear Ms Leacy,

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 16 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.

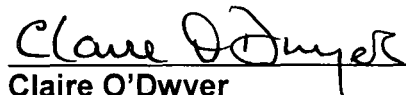
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 03 April 2017.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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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07 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: Graeme Reid, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews,  
23 Farnham Street, Cavan, Co. Cavan.

Location of Facility: Streanduff & Derryhoosh, Glaslough, Co. Monaghan.

Ref. No: P1054 - 01

EHIS Ref: 0587

Dear Claire,

I refer to the submission of an application for an Industrial Emissions License to the EPA for poultry production units from Graeme Reid, Aghaboy, Glaslough, Co. Monaghan.

The licence application for the proposed units was received by the EPA on the 02 March 2017. Following a review of the EIS submitted by the applicant, the HSE Environmental Health Service conducted a site visit on 03 April 2017 where contact was made with Mr Neville Reid, father of the applicant.

The proposed development of two broiler rearing houses, with a capacity for 50,000 birds each, will be completed on a green field site within the applicants family landholding. The capacity of the farm upon completion of all proposed developments will be 100,000 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 300m of this site.



### **Water Supply:**

The applicant proposes to drill a deep bore well on the site of the proposed development or alternatively use an old existing well which is also on site. The applicant intends to use the water from the well for the proposed development.

It is recommended that the applicant ensure that the well head is suitably protected and free from any risk of contamination from surface water and pests.

It is further 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 of the proposed development are to be drained via a piped drainage system and discharged to a land drain located on site. The discharge point however, is not indicated in Appendix 2 in the EIS. There is no risk of flooding as the installation is located on an elevated site.

It is recommended that the applicant ensure that all discharge points are clearly labelled at the facility for the purpose of monitoring and sampling.

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.

Thus far 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**

The applicant proposes to construct two concrete wash tanks at the facility to accommodate wash water from the two proposed poultry houses.

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 proposed wash water tanks to help reduce any risk of contamination.

The applicant proposes spread the wash water on the family land surrounding the site in accordance with the Nitrates Directive.

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.

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

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

The applicant intends to recycle waste where possible or otherwise dispose of correctly at Monaghan County Council Amenity Centre and or returned to the supplier.

The applicant intends to store dead birds in suitable wheelie bin containers which will be collected by College Proteins, Nobber, Co. Meath, at determined intervals.

It is recommended that the applicant, as part of the licence conditions, ensures that the dead bird storage containers are emptied regularly and in any event before they overflow.

#### Odour

Increased emissions may at times be associated with the loading of poultry manure once every 6-8 weeks for around 4 hours per house.

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. As this is a green field site there will be increased activity at this location when the new proposed 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

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 facility.

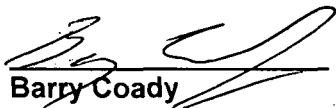
#### Oil Storage Tank:

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:

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

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