



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Submission No. 1

Environmental Health Service  
HSE Dublin/North East  
Cavan and Monaghan  
The Arcade  
Main Street  
Cavan  
Co Cavan

Tel No: +353 (0) 49 4373418

Fax No: +353 (0) 49 4373427

Ref/ BC/CO'D/ EHIS Ref: 0607

26 May 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: Mr. Anthony McCluskey, Coskemduff, Cootehill, Co. Cavan.**

**Ref. No/ P1056 - 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 25 April 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 17 May 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

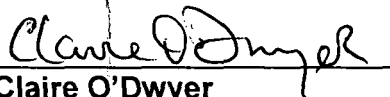
Air

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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Tel: 049 4373418  
Fax: 049 4373427

26 May 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: Anthony McCluskey, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan, Co. Cavan.

Location of Facility: Coskemduff, Cootehill, Co. Cavan

Ref. No: P1056 - 01

EHIS Ref: 0607

Dear Claire,

I refer to the submission of an application for an Industrial Emissions License to the EPA for poultry production units from Anthony McCluskey, Coskemduff, Cootehill, Co. Cavan.

The licence application for the proposed units was received by the EPA on the 24 April 2017. Following a review of the application form submitted by the applicant, the HSE Environmental Health Service conducted a site visit on 17 May 2017 where contact was made with the applicant Mr. Anthony McCluskey.

The facility consists of two broiler rearing houses, with a capacity for 50,000 birds.

The following are observations made during the site visit and whilst reviewing the said application and related documents in conjunction with EPA guidance documents and associated Legislation. There is no EIS attached to this application.

### **Receptors**

There is no neighbouring dwelling within 100m of this site. The applicant has advised that there have been no complaints and this office is not aware of any complaints.

### **Water Supply:**

The facility is supplied with water from the Dernakesh Group Water Scheme. The applicant's application does not mention this water supply. There is no bored well on site.

### **Surface Water & Storm Water**

All clean surface water from the yards and the storm water from the roofs of the facility are drained via a piped drainage system and discharged to a land drain located on the applicants land. 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 is being contaminated by soiled water.

The surface and storm water discharge point are not identified in the application 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 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. This is particularly important when considering the significant increase in production.**

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.**

### **Soiled Water & Wash Water Tanks**

The applicant has one concrete wash tank at the facility to accommodate wash water from the two poultry houses. The applicant uses a stopper system whereby the clean water drainage system is plugged during clean down to allow soiled water be directed to the wash water tank and visa versa.

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. That a system is put in place to ensure that the stopper system currently in place is strictly adhered to and that all persons engaged in the cleaning process are acutely aware of the system.

It is further recommended that a condition of the licence stipulate the applicant fit high level indicators to the wash water tank to help reduce any risk of ground water 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 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.

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.

#### Manure

All manure is removed off site by a contractor named John Rice.

#### Waste

The applicant stores dead birds in suitable wheelie bin containers which are collected by College Proteins, Nobber, Co. Meath at appropriate 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

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.

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. To date 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.

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 destocking and the cleaning process.

**Pest Control**

The applicant manages pest control on site. A visual inspection of the bait boxes was carried out and they were 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 facility.

**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**

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