



**Feidhmeannacht na Seirbhíse Sláinte**  
**Health Service Executive**

Office of Climate, Licensing & Resource Use,  
Environmental Protection Agency,  
Headquarters, P.O. Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.  
Y35 W821

ID Number: 0598

Re: P1055-01

**Proposed Development:** 6.2; The rearing of pigs in an installation where the capacity exceeds - (a) 750 places for sows, or (b) 2,000 places for production pigs which are each over 30kg.

**Applicant:** Bohar Ash Pig Breeders Limited.

**Address:** Kilconlea Upper, Abbeyfeale, County Limerick.

Dear Sir/Madam

Please find enclosed the HSE consultation report(s) in relation to the above proposal.

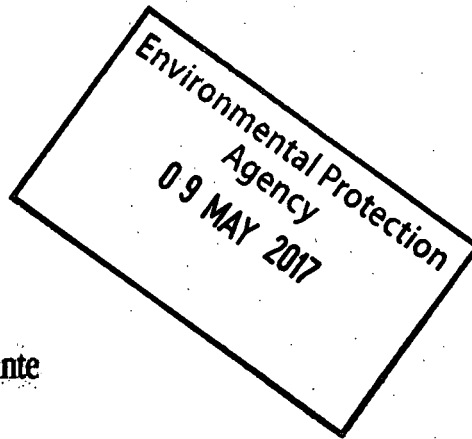
If you have any queries regarding any of these reports, the initial contact is Andrew Curtin Principal Environmental Health Officer who will refer your query to the appropriate person. The following HSE departments were made aware of the consultation request for the proposed development on 10-04-2017

- Emergency Planning – Paschal Diviney
- Estates – Helen Maher, Estates Manager – Environmental Services
- Assistant National Director for Health Protection – Kevin Kelleher / Marie Woods
- CHO – Bernard Gloster

#### **Environmental Health Report**

The EH service response to the proposal is in the attached consultation report.

- The assessment is based (solely) on an assessment of documentation submitted to this office on 10/04/2017 by Industrial Emissions Application P1055-01 with EIS at Kilconlea Upper, Abbeyfeale, Co. Limerick
- A site visit(s) was conducted on 25/4/17 accompanied by Bertie Greaney.
- This report refers only to those sections of the documents which are relevant to the HSE.



Environmental Health Service,  
Health Service Executive West,  
Ashbourne Hall,  
Ashbourne Business Park  
Dock Road,  
Limerick  
Phone: 061 461505

5/5/17

ENVIRONMENTAL PROTECTION

11 MAY 2017

CORK

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We have made observations and submissions under the following specific areas

Human Beings

Soil

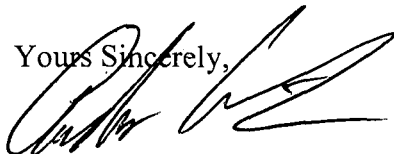
Water

Air

Climatic Factors

Material Assets

Yours Sincerely,



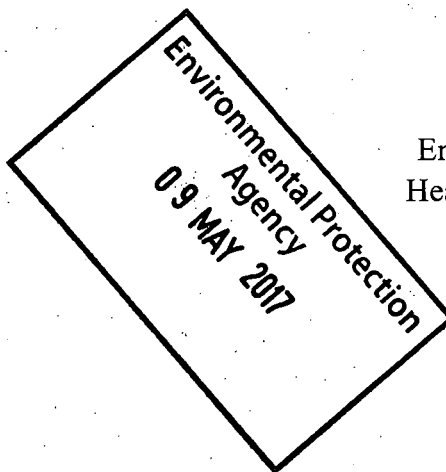
Andrew Curtin

Principal Environmental Health Officer

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2/5/17

### **Industrial Emissions Licence Application**

- **Name and address of applicant:** Bohar Ash Pig Breeders Limited
- **Location of facility:** Kilconlea Upper, Abbeyfeale, County Limerick.
- **\*Class and Nature of the Activity:** 62. The rearing of pigs in an installation where the capacity exceeds - (a) 750 places for sows, or (b) 2,000 places for production pigs which are each over 30kg.
- Reference No:** P1055-01
- EHIS reference:** 0598

Dear Sir/Madam

I refer to the above application prepared by Montgomery EHS Ltd, Kantoher Business Park, Killeedy, Ballagh, Co Limerick behalf of the applicant Mr. Bertie Greaney. I would also refer to my on-site visit to the Pig fattening operation and meeting thereon with Mr Greaney on the 25/4/2017. The site is located at Kinconlea Upper, Abbeyfeale, Co Limerick.

This farm operates as a pig fattening unit with pigs coming from Mr Greaney Pig Rearing unit in Buttevant Co Cork. The facility in Abbeyfeale comprises of animal houses, manure collection and storage tanks, ancillary structures and equipment necessary for the accommodation, management and husbandry of the animals and the administration of the enterprise.

The farm is owned and operated by Mr Bertie Greaney. Mr Greaney purchased the farm from James McEnerney whom is resident with his wife in the dwelling located adjacent to the farm buildings. Mr McEnerney ran a pig fattening business until his retirement and the purchase of the farm by Mr. Greaney. Mr Greaney is the responsible person on site and

lives in the locality. The main activities at this facility occur during normal working hours between 8 am and 20.00 p.m. Stock inspection in line with normal farming practices are carried out everyday including weekends and holidays. Automatic systems such as feeding, water supply and in-house ventilation operate continuously on a 24 hour basis.

The existing site has been subject to planning permission reference 15573 for the demolition of existing fattening dry sow and farrowing weaner houses and replace with 6 new fattening houses and a new stage 2 houses and associated site works. Planning permission was granted on the 2/3/2016.

The previous owner of the farm Mr James McEnerney had a number of planning permission applications including the following file numbers

- 07890: construction of a circular overground slurry tank
- 7510079 erection of 12 unit solari type farrowing pens and walled slurry pit
- 7712433 erection of dry sow house and farrowing house.

#### **On-site operations/process/Facilities'**

The structures and equipment onsite site are designed and installed for the proposed of fattening pigs for sale off site for processing into food by the pork/bacon industry. The EIS as submitted details in relation to the processes onsite including:

Pigs are brought in from the rearing farm at 20kg and rearing until finished weight of c: 110kg. The capacity is 3500 pigs. Input materials onsite are water and animal feed. The fattening units maintain a constant heat and are ventilated.

The farm is located in a rural area accessed via a farmyard passageway off the local road L7051-171. The total area of the site is 1.2 Ha.

The nearest dwelling to the piggery unit is the previous owners dwelling 30m East of the unit. The next nearest residential dwelling is 40m from the site. The site boundary is marked with a combination of hedgerow and fencing and is largely shielded from all directions.

The facility consists of fattening houses, manure collection and storage tanks and other farm buildings some of which are old are require upgrading.

#### **EPA Guidance Note on Best Available Techniques for the Pig Production Sector**

In assessing and evaluating this application regard is had for the content and provisions of the above document. The Guidance Note is one of a series issued by the Environmental Protection Agency (EPA) which provides guidance on the determination of Best Available Techniques (B.A.T.) in relation to applicants seeking Industrial Emission licenses under Part

IV of the EPA Acts 1992 – 2003 and is intended for use as a tool in determining BAT for the activities specified in this licence application.

### **Process Description**

The pig finishing activities onsite are similar to any intensive pig units throughout Ireland. The unit is supplied with pigs at c. 20kg from the applicants breeding farm in Buttvant Co Cork.

Selection of the stock by physical measurements (e.g. litter size, growth rate, backfat depth) and the use of computers enables genetically transmitted performance to be improved each year. Thus the facility will be stocked with pigs which have a high genetic potential which will be continually monitored and improved by replacement.

The health status of the stock is probably the most important single element to ensure the efficiency of the enterprise. All stock entering the units has to be free from all major diseases. Accordingly, all replacement stock for this pig farm will be sourced from its own breeding unit which will be free from diseases. According to the application as a secondary method of disease prevention all the pigs are vaccinated with Mycoplasma as soon as they arrive and once again 3 weeks later.

The final part of maintaining health within the unit is to allow sufficient space on the unit such that pigs are moved in an "all-in – All Out" basis as they progress from building to building. Each age group of pig have a different level of immunity and even in high health status herds it is important not to mix pigs of different age groups. Equally important is the necessity to clean out pens or rooms after each batch moves on to the next section of the unit. This avoids the build up of bacteria and viruses which challenge the incoming pigs and which may affect their growth efficiency.

Onsite there are farrowing rooms which are drained heated and ventilated. The walls of the rooms are cladded with insulation and the heating system is constant. If the heating system fails or drops below a certain temperature the applicant stated that he will receive a text alert to his mobile phone indicating any potential problem.

The pigs are maintained over slats. The farrowing pens have an automated feeding and water system onsite for the pigs. Once each batch of pigs leave each room the slatted units are powered hosed and disinfected.

operation are directed to slurry storage tanks under the piggery buildings.

The stored slurry goes to off-site land spreading. Boherash Pig Breeders Ltd's will install a 30 m3 sewage storage tank will be used for the disposal of domestic wastewater which will be tinkered away for disposal by a licensed contractor

The EPA BAT document specifies that pig manure may be used as a fertiliser for the activities described above but only in accordance with SI 378 European Communities (Good Agricultural Practice for protection of Waters) regulations In this regard the applicant is required to prepare a detailed nutrient management plan providing details in relation to the lands on which manure shall be recovered, records of all manure movement s off site, transportation, nutrient requirements of the land and crop grown thereon.

### Aqueous discharges

Wash water from wash down of the houses is collected on site in an underground storage tanks. The submission states that storm water from roofs and paved yards is not permitted to flow over soiled areas and is discharged to a monitoring point identified as SW1 on the site layout plan. The piggery units are purpose built in the last year therefore there has been good adherence to closed drainage systems.

The application states that all wash water (soiled water) is collected and there will be no discharge to groundwater or to a watercourse. Shay Galvin B.E MIEI has submitted a letter stating that the new fattening houses each have a storage capacity of 26 weeks in their tanks. The open slurry pit onsite will be used as an emergency capacity if needed.

The storage tanks should be properly bunded as there could be significant emissions to ground water if there is a leak within same. The tanks should be 120% bunded and visual inspections should be carried out regularly to ensure no leakages. For slow leaks there might be some reconciliation of amount stored and amount regularly removed. If, for example, suddenly less volume is being removed over same time period then it might indicate leakage, applicant should be cognisant of same.

### Emissions

The main emissions from the pig rearing activity are odour and some dust emissions from the buildings ventilation system.

#### **1. Air**

Emissions to atmosphere from this plant include warm air from the heating system for the pigs, the onsite odour generated and the off-site odour generated by landspreading in the locality.

## **2. Surface Water**

Surface water is generated from roofs of the pig fattening units and concrete paved yardway surrounding the units. Pig fattening activities are confined to within the units.

As the facility was recently constructed there has been particular thought and planning put into the drainage system at the facility.

There is no process effluent and no emission to surface water from the site. Storm water from roofs and clean yard areas is discharged to a field drain at discharge point marked SW1 on the site plan in Attachment E.2.2 (National Grid Reference E106560 N240410). The receiving field drain flows to the River Feale.

## **3. Wash water**

Wash water arising from the wash down of the houses is collected in the underground storage tanks.

## **5. Noise**

The site is located in a rural environment where housing density is relatively low and where agricultural (farming) is the predominant activity. The previous owner of the facility Mr James McEnerney is the nearest dwelling house to the facility. He operated the facility for over 40 years although at a smaller scale. The applicant Mr Greaney stated that he has not received any current complaints in relation to noise from the facility. The facility is surrounded by mature trees and hedgerow which is also providing a positive impact as a noise attenuation measure.

The noise sensitive dwellings are the ones highlighted in the submission including Mr James McEnerney which is within 100 Metres of the development.

This Department has not received any complaints in relation to these noise sensitive areas to date. I am satisfied from onsite-inspection/observations that the activities carried out at this installation are not likely to result in significant noise emissions. Notwithstanding same, a system of compliance monitoring should be incorporated into any proposed licence

determination. B.A.T. specifies the standard noise emission limit values of 55 (daytime) and 45 (night time) dB (A) at any noise sensitive location. Applicant should be cognisant of same levels.

## 6. Other Waste

Other sources of waste onsite include:

- **Dead animal carcasses** are a source of waste. Animal carcasses arise from mortalities associated with the rearing of pigs. The applicant indicated that dead animals are few however when it happens dead animals are stored in sealed skip container onsite. The applicant stated that Wards waste collection are the licensed waste collection haulier for his facility.
- **Veterinary Waste**- will be minimised by maintaining a high health status and maintaining stocking rates in line with animal welfare requirements.
- **General Waste**- Will be recycled where possible.
- **Fluorescent tubes** etc. will be handled in accordance with E.P .A. Licence requirements.

## Observations/Recommendations

From on-site observations, inspection and discussions with Licensee I am satisfied that the on-site facilities, operation and management conform to a high standard of practice. Notwithstanding same the facility does give rise to listed environmental emissions and has the potential to cause nuisance and give rise to complaint, particularly during that phase of the operation when manure is removed and recovered off site.

It is acknowledged that the licensing process comprehensively addresses in a holistic manner the prevention, control and monitoring of generated emissions through the Proposed Determination (P.D.). This office is concerned primarily with highlighting issues of public health/environmental health concern where it is of the opinion that the Licence application does not adequately address such concerns. Whilst there are no objections to the licence application from a public health viewpoint, a number of issues are identified as being worthy of further information so that potential public/environmental health impacts are properly controlled/eliminated.

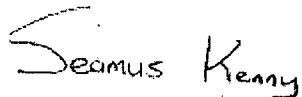
- There is a requirement under BAT for intensive agricultural sector to demonstrate recovery capacity for nutrients generated. A nutrient management plan (NPM) is required based on European Communities (good Agricultural Practice for Protection of Waters) Regulations (S.I 378 of 2006). In this instance the applicant has not identified any land holding which he is supplying. The NMP should provide maps of



all intended spreadlands and soil sample results of such intended spreadlands. The application states that Pig manure will be collected and stored in covered tanks until some local farmers acquire it for use on their farmland. The distribution of manure to individual farmer customers who use it is limited to the amount demonstrated to be needed by them to maintain their soil fertility, in accordance with the Nitrate Directive Regulations S.I. 378 of 2014. Applicant should maintain distribution details/contact names numbers/addresses for the pig manure when sold for landspreading.


- During the onsite visit the applicant provided me details of well water analysis. The well was last sampled on the 9/11/16 and the sample was satisfactory from a microbiological and chemical viewpoint. The applicant stated that he also has access to the PWS that passes the public roadway at the front of his property. A non-return valve should be fitted to pipework in the event that applicant is required to alternate between the private and public water supply. Applicant also stated that the previous owner Mr James McEnerney dwelling is still served by the onsite well. Applicant shall be informed that in the event in the deterioration of the microbiological/chemical quality of the well water that he inform Mr McEnery and his wife of same, take remedial action and resample.
- The EIS submission has identified the surface water receiver ditch at coordinates E106530 N240350 and the receiving waters as the River Feale. Applicant shall undertake weekly visual monitoring at the surface water discharge point as highlighted in the submission. Grab samples for BOD, suspended solids and Phosphate shall be undertaken on a quarterly basis as highlighted in table F 1(i) of the submission.
- Applicant has identified a number of residential dwellings in the vicinity of the facility however there is no information regarding whether they have their own private wells or whether they are connected to the PWS. Water sources for dwelling within close proximity to the facility should be identified and information regarding the citing's of the any private well's should be submitted in the interest of protection of groundwater during local landspreading around the facility.
- Mr Greaney informed me that he undertakes his own baiting and monitoring of the site. It is recommended that a map indicating the location of the bait points is available. The inspection and replenishing of bait should also be recorded. A material safety data sheet for the bait used should also be kept onsite.

Yours faithfully,



Seamus Kenny  
Environmental Health Officer

Agreed,



Andrew Curtin  
Principal Environmental Health Officer

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