



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



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Ref/ BC/CO'D / EHIS Ref: 0622

21 June 2017

Ms Noeleen Keavey  
Office of Climate, Licensing & Resource Use  
Environmental Protection Agency  
Headquarters P.O. Box 300  
Johnstown Castle Estate  
Co. Wexford.

Re/ Review of current 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 Bernard Treanor, Doogary, Tydavnet, Co. Monaghan.

Ref. No/ P0861- 03

Dear Ms Keavey,

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

If you have any queries regarding the report, the initial contact is Ms. Claire O'Dwyer, Principal Environmental Health Officer.

The following HSE departments were made aware of the consultation request for the above application on 12 May 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 19 June 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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21 June 2017

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

**Re/ Review of a current Integrated Pollution Prevention and Control License.**

**Class and Nature of Activity: 6.1**

**The rearing of poultry in installations where the capacity exceeds 40,000 places.**

**Applicant: Mr Bernard Treanor, / Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.**

**Location of Facility: Doogary, Tydavnet, Co Monaghan.**

**Ref. No: P0861- 03**

**EHIS Ref: 0622**

Dear Claire,

I refer to a review of an existing IPPC licence for a poultry production unit belonging to the above named applicant. The IPPCL review application for these units was submitted to the EPA on the 05 May 2017. There are currently 4 fully operational poultry houses to accommodate 145,000 broilers onsite. The applicant is proposing to construct an additional poultry house which will increase capacity to 190,000 broilers on site.

The following are observations made whilst reviewing the current IPPCL, EIS and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit and discussions with Mr Bernard Treanor, on 19 June 2017.

### **Site Location**

The nearest neighbour is located within approximately 100m of the site however the EIS states that no third party dwelling is located in within 150 meters of the site. This is not in line with Section 4.3 of the Batneec Guidance Note for the Poultry Production Sector. It was established that both the poultry site and the nearest neighbour have been living side by side for a long number of years without any issues arising. The applicant has stated that there have been no complaints and this office has not been made aware of any complaints.

### **Manure**

Currently all manure is collected by the contractor C.L.R. Co-op Ltd (T/A Poultry Manure Supplies) located at Mount Louise, Smithboro, Co. Monaghan, who removes the manure to be used in the manufacture of mushroom compost at various compost yards throughout the country. There is currently no suitable storage area for manure on site however, this is being proposed as per Appendix 7 and in any event the applicant stated that all manure is removed off site following the removal of stock by Carton Bros. for processing.

**It is recommended, in terms of the new structure, that the applicant is advised to adhere with 4.5 of the Batneec Guidance Note for the Poultry Production Sector and the conditions therein.**

### **Water Supply**

There are currently no bored wells on site. A bored well previously existed however, this well has now been decommissioned and sealed up. All water for stock, washing and for the applicant's home is supplied by Tydavnet Water Group Scheme as indicated. The water supply is tested by the applicant annually as required by Bord Bia and to date all tests have been satisfactory. Records of sampling are maintained by the applicant.

### **Wash Water**

Wash water is collected and stored from the four existing poultry houses in wash water tanks located at the end of each poultry house. The applicant stated that when the wash water tanks are reaching their capacity the tanks are emptied and mixed in the cattle slurry tank and it is then subsequently spread on the family land surrounding the site at the appropriate time of the year and in accordance with the Nitrate directive.

**It is recommended that the applicant is advised to adhere with Section 4.6 of Batneec Guidance Note for the Poultry Production Sector and the conditions therein.**

The applicant had high level monitors installed on each wash water tank at the time of the site visit.

**It is recommended that the applicant maintain the high level monitors in working order and ensure that they are monitored regularly to minimize the risk of unintentional overflow. It is also advised that the applicant fit a high level indicator to the proposed wash water tank when operational.**

When the poultry have reached the age for slaughter they are loaded at the opposite end of each house than that of the wash tanks i.e. the roadside end. It was noted that there is potential or likelihood for manure to be carried out onto the concrete yard during the loading process.

During the cleaning of the yard or during wet weather there is potential for quantities of soiled wash water to enter the clean surface water drainage system and subsequently discharged into the land drain. It was established however that the potential for contamination of the clean surface water may only occur during the cleaning process and not during day to day operations.

It is recommended that the applicant is advised to take all due care to ensure that wash water is not discharged to the clean surface water land drain during the cleaning process as per licence. It is further recommended that if poultry houses are emptied during wet weather, that manure spillage is eliminated as far as reasonable possible and in any event is cleaned up before it enters the clean surface water discharge point to avoid any potential water pollution incidents.

The applicant stated that he empties the wash water tank regularly and either mixes the soiled water in the cattle slurry tank or spreads it on his land to ensure no overflow occurs. In any event 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 *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.

The applicant is proposing to construct additional wash water tanks to facilitate the new poultry houses.

**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.

#### **Storm Water / Surface Water**

Storm water and surface water are drained by natural means from the roofs of the poultry houses and associated concrete yards via a piped drainage system and discharged to a land drain located to the South East of the site. The discharge point is not identified on the EIS however, the discharge/monitoring points are labeled/identified by the applicant on site.

**It is recommended that the licence stipulate that all discharge points must be labeled including grid references.**

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.**

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.

#### **Waste**

As per licence there is adequate storage facilities provided for the storage of dead bird carcasses on site. I was informed by the applicant that the carcasses are removed every week or more often if necessary, by Michael Galligan, Gortnaleck, Ballyconnell, Co. Cavan, and not by College Proteins Ltd, as stated in the EIS.

#### **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 from the existing poultry units once every 6-8 weeks for around 4 hours per house.

At the time of the site visit odour levels appeared acceptable for this type of farming activity. The applicant stated that there have been no complaints regarding odour nor is this office aware of any odour complaints regarding this facility.

**It is recommended that the applicant be advised to continue to monitor odour from the installation in light of the proposed increase in production and the fact that his nearest neighbour is approximately 100m from the installation as per licence.**

#### **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. This office has not aware of any noise complaints regarding this installation. At the time of the site visit noise levels appeared acceptable for this type of farming activity.

**It is recommended that the applicant be advised to continue to monitor noise from this installation particularly during the construction phase and in light of the fact that his nearest neighbour is approximately 100m from the installation as per licence.**

#### **Pest Control**


Pest control measures are carried out by the applicant. A visual inspection of the bait boxes was carried out. The boxes were well baited and located at regular intervals around the houses. Records of pest control measures are being maintained by the applicant.

**It is recommended that the applicant ensures the same pest control measures are applied to the proposed development and that the bait boxes continue to be monitored regularly to ensure an adequate amount of bait is present in the boxes and that pest control records and measures continue to be maintained on site as per licence.**

**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,

  
BP Barry Coady  
Environmental Health Officer

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