

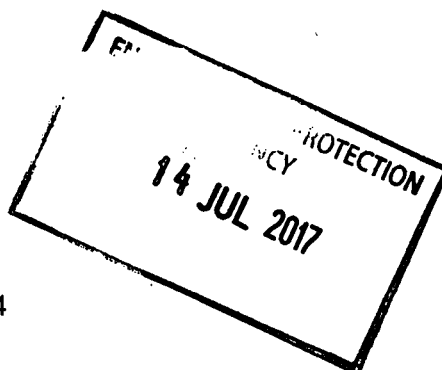


Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Submission No. 1

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

Tel: 049 4373418  
Fax: 049 4373427



Ref/BC/CO'D/ EHIS Ref: 0634

12 July 2017

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

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

**Class and Nature of Activity: 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 Mr Nigel Flynn, Tiernahinch Far, Clones, Co Monaghan.**

**Ref. No: P0926 - 03**

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 23/06/17:

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- RDPI

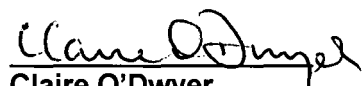
The Environmental Health service response to the application is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 07/07/17.
- Environmental Health was not included at the Screening / Scoping stage of this application.
- 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	Soil
Water	Air
Climatic Factors	Material Assets
Interaction of the above	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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12 July 2017

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

**Re: A review of an existing Integrated Pollution Prevention and Control License for a Proposed New Poultry Unit.**

**Class and Nature of Activity: 6.1**

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

**Applicant: Mr Nigel Flynn, c/o Mr Pdraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.**

**Location of Facility: Tiernahinch Far, Clones, Co Monaghan**

**Ref. No: P0926 - 02**

**EHIS Ref: 0634**

Dear Claire,

I refer to a review of an existing IPPC license for a poultry production unit belonging to the above named applicant. The IPPCL application for these units was submitted to the EPA on the 19 June 2017. There are currently 3 fully operational poultry houses to accommodate 109,000 broilers onsite. Rearing of chickens is carried out from day olds until removed off site for meat production. The applicant is proposing to construct a fourth poultry house on site to accommodate a further 50,000 broilers.

The following are observations made whilst reviewing the said application and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during the site visit and discussions with Mr. Nigel Flynn on 07 July 2017.

#### **Site Location**

The nearest neighbour is located approximately 150m from the facility. 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 a suitable storage area for manure on site however no manure is currently stored on site. The current arrangement is to continue with the new development.

### **Soiled Water**

Currently, soiled water is collected from the three existing houses in soiled water tanks located at the lower end of each poultry house. The soiled water from the yard wash down is collected in a separate soiled water tank beside the manure storage shed at the lower end of the yard. There is a natural fall in the concrete yard which drains soiled water during cleaning to the soiled water tank and clean surface water to a field drain. Both outlets are located beside the soiled water tank. When cleaning is in progress the clean surface water outlet is blocked off to allow soiled water to drain to the tank and visa versa when cleaning is complete the soiled water tank is blocked off to allow drainage of clean surface water to the field drain. The applicant stated that if the tanks are getting full he mixes the soiled water in the cattle slurry tank and it is subsequently spread on the family land surrounding the site in accordance with the Nitrates Directive. There is however no high level monitors on the soiled water tanks. If the tanks were to overflow it may adversely affect the water quality in the water course directly to the north of the site.

**It is recommended that all soiled water tanks including the tank associated with the new development have high level monitors installed.**

**It is also 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.**

### **Surface Water**

Storm water and surface water are generated from the roofs of the poultry units and yards respectively. Storm water is drained by natural means from the roofs of the existing poultry houses to a stone drainage system and then discharged to a land drain. The surface water associated with the yard in front of the existing poultry houses is drained to a separate collection point and then discharged to a land drain. The discharge points are not identified in the EIS nor are they identified on site.

**It is recommended that the applicant clearly identify all clean surface and storm water discharge points including grid references for the purpose of monitoring and sampling.**

There is currently no surface water quality monitoring scheme in place to determine water quality at the discharge points. The EIS states that the new development will have no adverse impact on Tirnahinch Lough or its waters however this is impossible to determine as the discharge points are currently not tested to determine water quality.

**It is recommended that a surface water quality monitoring scheme is put in place as per licence. Periodic water quality monitoring of relevant parameters as per licence.**

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.**

### **Water Supply**

There is one deep bored well on the site. This well supplies drinking water to the applicants dwelling and family dwellings. It also supplies water to the existing poultry houses and will be used to supply water to the new development. The EIS, part 16.1, states that the water supply for the facility will be via a local water scheme. The well water does not undergo any treatment process. Potable water supplies must comply with quality parameters of Drinking Water Regulations 2014.

The applicant advised that the water supply is tested twice per year as per the requirements of Bord Bia.

**It is recommended that a groundwater protection plan be drawn up 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.

There has been some site works conducted around the well head. The well head however is not covered and may be prone to contamination from small animals. The applicant advised that he intends to cover the well head with a suitable manhole cover at ground level.

**It is recommended that the applicant ensure that a manhole cover is fitted as soon as possible and that the well head is above the surrounding ground level to ensure surface water run off does not penetrate the well.**

### **Waste**

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 two weeks, or more often if necessary, by Michael Galligan, Gortnaleck, Ballyconnell Co Cavan. This arrangement is to continue after the new facility commences. It was noted however that the dead bird storage bins were overflowing. The applicant advised that this was due to a recent removal of the birds for meat production.

It is recommended that that the applicant ensures that extra storage is provided in future for dead birds to prevent the facility attracting unwanted pests such as flies, rats, birds etc. which may cause the spread of disease to this facility or other facilities or cause odour issues to neighboring dwellings.

#### **Odour**

Emissions to atmosphere from this facility include normal respiration gases and odours emitted from the poultry houses. 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. This office is not aware of any odour complaints regarding this facility.

**It is recommended however that the applicant monitor odour from the facility closely particularly when the new development becomes active.**

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

**It is recommended however that the applicant monitor noise closely particularly during the construction phase of the proposed development.**

#### **Pest Control**

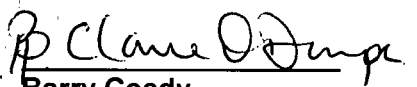
Pest control measures are carried out by the applicant. A visual inspection of the bait pipes was carried out. The pipes were in good condition and located at regular intervals around the houses however; they were poorly baited and in some instances not baited at all. The applicant advised that records of pest control measures are maintained on site. The applicant plans to apply the same pest control measures to the new development.

**It is recommended that the applicant's license include conditions regarding maintenance of pest control measures on site and that these measures are applied to the proposed new development.**

#### **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**