



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: 0639

25 July 2017

Ms Grainne Oglesby  
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. Niall McKenna, Knockballyroney, Scotstown, Co. Monaghan.

Ref. No: P1057- 01

Dear Ms Oglesby,

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 30 June 2017:

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

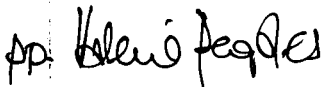
The Environmental Health service response to the application is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 14 July 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             | 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**



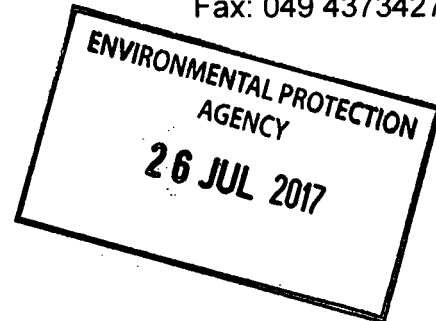
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Ms Claire O'Dwyer  
Principal Environmental Health Officer  
Environmental Health Office  
The Arcade  
Main Street  
Cavan  
Co. Cavan



**Re Application for a 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. Niall McKenna & Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.**

**Location of Facility: Knockballyroney, Scotstown, Co. Monaghan.**

**Ref. No: P1057-01**

**EHIS Ref: 0639**

Dear Claire,

I refer to an application for an IPPC licence for No. 2 poultry production units belonging to the above named applicant. The IPPCL application for these units was submitted to the EPA on the 19 June 2017. There is currently 1 fully operational poultry house to accommodate 42,000 broilers onsite. The applicant is proposing to construct an additional poultry house which will increase capacity to 84,000 broilers on site.

The following are observations made whilst reviewing the 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. Niall McKenna, on 14 July 2017.

### Site Location

The nearest neighbour is located within 100m of the site. 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. The applicant stated that the neighbour has consented to the construction and operation of the poultry houses.

### Manure

There is currently no suitable storage area for manure on site. 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.

### Water Supply

There are currently two sources of water supplying the facility. One bored well on site which is tested twice yearly by the applicant in line with Bord Bia requirements; to date all tests have been satisfactory. The well head is suitably protected. This water supply is not mentioned in the EIS. The second supply is from Tydavnet Group Water Scheme. This 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.

It is recommended that the applicant have a groundwater protection plan drawn up by the to address, but not be limited to, the following for wells where water is 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.

### Wash Water

Wash water is collected from the existing poultry house and stored in wash water tank located across the yard to the right of the existing poultry house and not to the rear of the poultry house as described in Appendix 1 of the EIS. The applicant has a stopper system in place to direct soiled or clean water to it appropriate destination. The applicant stated that when the wash water tank is reaching its capacity the tank is 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 no high level monitor installed on the wash water tank at the time of the site visit.

**It is recommended that the applicant install a high level monitor in order 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.**

The applicant is proposing to construct additional wash water tank to facilitate the new poultry house.

**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 from the roof drains directly into the surrounding land. The roof water is not drained as described in 5.0 of the EIS. Clean surface water from the concrete yard is drained via a gully and piped drainage system and discharged to a land drain located near the wash water tank. There was no evidence at the time of the visit to suggest that the clean surface water is being contaminated. On a visual inspection the methods used by the applicant to separate clean and contaminated water appears adequate. The clean surface water discharge point is not identified on the EIS nor is the discharge point identified by the applicant on site.

**It is recommended that the licence stipulate that all discharge points must be labelled and identified on site for the purpose of monitoring and sampling 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

There is inadequate storage facilities provided for the storage of dead bird carcasses on site. At the time of the visit the bins were overflowing with dead birds. The applicant advised that this was due to a recent removal of the birds for meat production. The applicant advised that the carcasses are removed every two weeks or more often if necessary by College Proteins Ltd.

It is recommended 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 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 within 100m of the installation.

### 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 within 100m from the installation.

**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 on site.

It is recommended that the applicant ensures the same pest control measures are applied to the second proposed poultry house 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 by the applicant on site.

**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,

pp. *Barry Coady*

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**Barry Coady**  
**Environmental Health Officer**

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