



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

Environmental Health Service,
Health Service Executive
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Ashbournes Hall,
Ashbourne Business Park,
Dock Road,
Limerick.

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

1/9/17

ID Number: 0652

Re: P1062-01

Proposed Development: 6.1: the rearing of poultry in installations where the capacity exceeds 40,000 places

Applicant: Mr Eamon Burke

Address: Farrihy, Broadford, Co 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 3/8/2017

- 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 3/8/17 by Industrial Emissions Application P1062-01 with EIS at Farrihy, Broadford, Co Limerick
- A site visit(s) was conducted on 24/8/17 accompanied by the applicant Mr Eamon Burke

- 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

Water

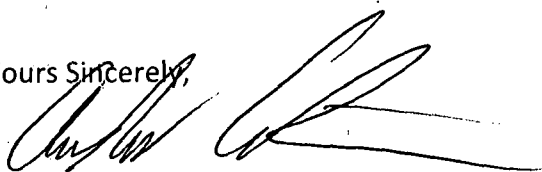
Air

Waste Management

Pest Control

Noise

Yours Sincerely,



Andrew Curtin

Principal Environmental Health Officer

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1/9/17

Name and address of applicant: Mr. Eamon Burke, Farrihy, Broadford, County Limerick

- Location of facility: Farrihy, Broadford, County Limerick

- *Class and Nature of the Activity: 6.1: the rearing of poultry in installations where the capacity exceeds 40,000 places

- Reference No: R1062-01

EHIS Reference: 0652

Dear Sir/Madam,

I refer to the above application prepared by Montgomery EHS Ltd, Kantoher Business Park, Killeedy, Ballagh, Co Limerick on behalf of the applicant Mr Eamon Burke, Farrihy, Broadford, Co Limerick. This Department has undertaken a desk study and a site visit on the 24/8/17. The applicant Mr Burke was present during the site visit.

The site is located in a rural setting on family lands. The activity on the site is the rearing of poultry in a licensable installation/facility. The installation comprises of animal houses, ancillary structures and equipment necessary for the accommodation, management and husbandry of the animals, and the administration of the enterprise. The structures and equipment on the site were designed and installed for the purpose of rearing poultry for sale off the site. The existing farm has the capacity to accommodate c. 52,000 birds.

Planning permission is been sought from Limerick County Council for two additional poultry houses with the capacity of 36,000 birds

EPA Guidance Note on Best Available Techniques for poultry 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.

In a submission to Limerick County Council MEHS stated that the poultry houses will not meet the recommended 400metres minimum distance from a residential property requirement as per guidance note. If a Industrial emissions licence was to be granted for this development the applicant would be required to ensure that all operations onsite are carried out in a manner that air emission and/or odour do not result in significant impairment of or significant interference with amenities or the environment beyond the site boundary and neighbouring proprieties.

Emissions

1. Air

An odour management plan for Mr. Burke's Poultry operation has been submitted in summary Mr Burke is committed to operating the existing facility to best practice. The proposed poultry houses will have the best available water and feeding systems and following construction of this houses Mr Burke plans to modernise the existing poultry houses with the same water and feeding systems. The key factors for odour management plan with the poultry operation is:

- Avoiding the build-up of slurry or manure on concrete around buildings;
- Removal and disposal of dead animals;
- Drain maintenance;
- Bedding cleanliness;
- Management of drinking systems, with emphasis on frequently adjusting nipple and drip cups to bird eye level to avoid spillage and wet litter;
- Stocking density;
- Litter moisture content;
- Insulation of the buildings and the long-term maintenance of that insulation;
- Ventilation and heating system;
- Type of heating;

The application states that Mr Burke has never received a complaint directly in relation to his poultry operation from a local resident, Local Authority, EPA, HSE, etc.

As part of the Odour management plan Mr Burke is committed to doing whatever is necessary to avoid complaints and if necessary is committed to the installation of odour abatement technology such as bio scrubber or bio-filters.

2. Aqueous discharges (wash water surface water)

Wash water from wash down of the houses is collected on site in an underground storage tanks. The submission states that the underground tanks will be tested in August 2017 and a report will be generated in September 2017. The outcome of such report shall be considered as part of the licence application.

The wash-water from cleaning the houses is to be applied to lands under ownership of the applicant having regard to the

All clean storm water will discharge via drainage ditch on site for the existing and proposed poultry houses..

All soiled surface water is diverted to the soiled water storage tanks, prior to its application to the applicant's landholding. A surface water sampling point has been identified as part of the application process. Figure 18 identifies the surface water sampling point. Applicant has stated that all land spreading of wash water will be conducted in compliance with the EU (good Agricultural Practice for the Protection of Water) Regulation 2014.

Poultry Litter

Poultry litter generated at this facility will be sent to the mushroom industry for composting. The application states that currently all poultry litter generated on-site is sent to Custom Composting. It also states that any change to the contractor will be agreed in writing prior to changing contractor and that at present the only material to be applied to land will be soiled water. The soiled water will be applied to the applicant's landholding adjoining the site.

Custom compost has submitted a declaration that they are contracted to remove poultry litter. It is proposed to remove up to 7 batches of poultry litter per year.

3. Noise

Application states that a detailed noise survey will be completed in Q4 2017 in order to determine noise emissions from the site. Application also states that there have been no complaints of noise emissions for this facility to date. The application states that activities currently on site do not generate noise levels that could be detected at site boundary, similar to most poultry farms in the country. The primary noise emission will be vehicular movement.

Application contains details on a baseline noise survey which was conducted as part of a noise assessment at locations adjacent to the proposed extension and its nearest noise sensitive locations. The survey was carried out on the 28th of

October 2016 and measurements were made over intervals of 30 minutes during the day and night which coincided with the removal of the broilers from the existing poultry houses. Noise measurements were made at the locations described in **Table 6.1**.

Description of Noise Monitoring Locations during Baseline Survey

- 1 House to the east of the poultry houses.
- 2 House to the south east of the site
- 3 House north east of the site
- 4 House at the Entrance of the site.

Application states that the facility will not result in audible noise outside of acceptable limits at or beyond site boundary. A noise survey was conducted and is included in Section 6 of the EIS. The results of the noise survey state that noise levels are within the EPA typically IPPC Licence guidance levels.

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.

Other waste

- **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.
- **Fluorescent tubes** etc. will be handled in accordance with E.P .A. Licence requirements. It is stated that between 5-15 tubes will be used annually. It is stated in the application that the Fluorescent Tubes are disposed of at the Limerick County Council, Civic Amenity Site, Station Road, Newcastle west, Co Limerick.
- **Veterinary Waste**- will be minimised by maintaining a high health status and maintaining stocking rates in line with animal welfare requirements.

Pest Control

Applicant has provided details in relation to pest control management onsite including details in relation to rodenticide and bait boxes. A bait management plan will be completed by the applicant.

Water Supply

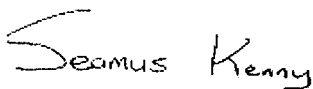
The farm, onsite dwelling and existing poultry houses are all supplied with groundwater from an existing onsite well. The applicant states that the well is 68 metres deep and is 150mm borehole with a 100mm liner. It is proposed that this water supply will be connected to the proposed new poultry houses. Samples of the well have been submitted for analysis. The results of same were not available to this Department in the submitted documentation.

Conclusion

From on-site observations, inspection and discussions with the 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.

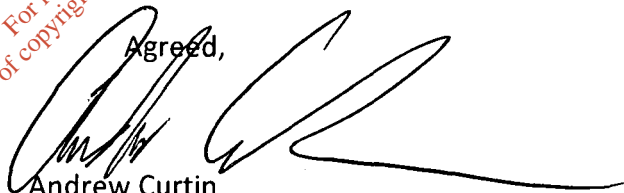
This office is concerned primarily with highlighting issues of public health/environmental health concern where it is of the opinion that the Licence application does not adequately address such concerns. There are no objections to the licence application from a public health viewpoint.

Yours sincerely,



Seamus Kenny
Environmental Health Officer

Agreed,



Andrew Curtin
Principal Environmental Health Officer

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