



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Submission No. 2

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: 0675

20 October 2017

Mr. Patrick Doyle  
Office of Climate, Licensing & Resource Use  
Environmental Protection Agency  
Headquarters  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford

Re/ Application for 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.

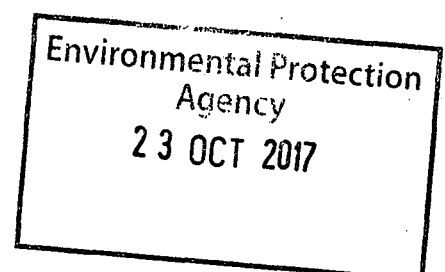
Applicant: Mr. Eddie Lynch, Drumbannow, Loughduff, Co. Cavan.

Ref. No/ P1064- 01

Dear Mr. Doyle,

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 03 October 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 13 October 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

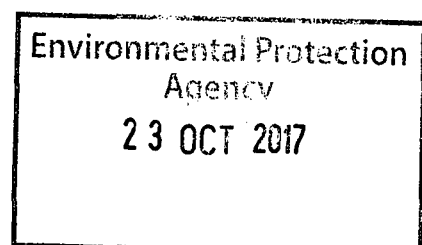
Soil  
Air  
Material Assets  
Waste

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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20 October 2017

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

**Re: Application for an 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. Eddie Lynch, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.**

**Location of Facility: Drumbannow, Loughduff, Co. Cavan**

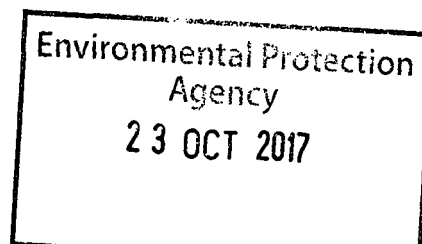
**Ref. No: P1064 - 01**

**EHIS Ref: 0675**

Dear Claire,

I refer to an application for an IPPC licence for 2 proposed poultry production units from the above named applicant. The IPPCL application for these units was submitted to the EPA on the 29 September 2017. The applicant stated that he is proposing to construct 2 poultry houses on a greenfield site attached to an existing cattle farm which will accommodate 100,000 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. Eddie Lynch on the 13 October 2017.



### **Site Location**

The nearest non-family neighbour is located just over 100m from the site. It was established that the applicants existing cattle farm 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 he has consulted with his neighbour and that the neighbour is not filing any objection to the proposal and that there have been no complaints. This office has not been made aware of any complaints. Appendix 3 has no Site Layout Plan attached.

### **Water Supply**

The existing cattle farm is supplied with drinking water from Ernevalley Group Water Scheme. The applicant stated that he intends to use the same water scheme for the proposed poultry units. It was further stated that the water supply is tested regularly as per Bord Bia requirements and has been, to date, satisfactory. This office is not aware of existing issues with this water supply. The applicant further stated that he intends to conserve some of the roof water by piping it to holding tanks to be used for the washing of the poultry houses only.

**It is recommended that a condition of the licence stipulate that the applicant maintain all results for water testing on site for the purposes of examination.**

The applicant stated that he may drill a deep bored well on site as a back up to the existing water supply.

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

### **Manure:**

It is proposed that all manure will be collected by the contractor Eamon Fitzpatrick, Lisnroe, Clones, Co Monaghan who will remove the manure from the houses for the purpose of mushroom cultivation at various locations. No Manure will be stored on site however suitable facilities exist to accommodate manure storage if necessary.

### **Wash Water**

Wash water from the proposed units will be collected and stored in two dedicated and newly constructed wash water tanks located to the front end of each proposed 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:**

Environmental Protection  
Agency  
23 OCT 2017

- 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.

The applicant stated that when the wash water tanks have reached their capacity the tanks are emptied and mixed in the cattle slurry tank and or 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.

It is further recommended that the applicant install High Level Monitors to the proposed wash water tanks in order to minimize the risk of unintentional overflow.

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

The applicant proposes to drain storm water from the roofs and from the clean yard surfaces via a piped drainage system where it will be discharge to a field drain. The clean water drainage system and discharge points are not identified in Appendix No. 2.

It is recommended that the licence stipulate that all discharge points must be labeled and identified on site for the purpose of monitoring and sampling including grid references.

It is recommended that the applicant is advised to take due care when birds are being removed from the houses and during clean down as there is the potential for contamination of clean surface water at that stage and particularly during wet weather if the drainage stopper system, which the applicant proposes to use, is not correctly managed.

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.

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.

There is no risk of flooding as the installation is located on an elevated site.

#### **Waste**

It is recommended that adequate and suitable storage facilities are provided by the applicant for the storage of dead bird carcasses on site. That the applicant is advised that the carcasses should be removed by a registered contractor as often as necessary and in any event before the storage containers overflow. That all other waste is disposed of at Cavan Co. Co. civic amenity centre or returned to the supplier for recycling.

#### **Odour**

It is recommended that the applicant be advised to monitor odour from the installation.

#### **Noise and Dust**

It is recommended that the applicant be advised to continue to monitor noise and dust from this installation particularly during the construction phase.

#### **Pest Control**

Pest control measures are carried out by the applicant on the existing cattle farm. The applicant proposes to extend these pest control measures to the proposed poultry units.

It is recommended that the applicant is further advised of his obligations in terms of vermin control.

It is further recommended that the applicant is advised to apply the same pest control measures to the proposed poultry houses and that the bait boxes are monitored regularly to ensure an adequate amount of bait is present in the boxes and that pest control records and measures be maintained by the applicant on site.

#### **Oil Storage**

The applicant stated that he does not intend to store oil on-site of the proposed poultry units and that gas will be used to heat the units.

#### **Conclusion:**

Other than the issues stated above, the Environmental Health Service have no further concerns at this time regarding this facility.

Yours faithfully,



**Barry Coady**  
Environmental Health Officer