

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
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Co Cavan

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Ref/ BC/CO'D/ EHIS Ref: 0661

12 October 2017

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

Eminonmental Protection
19 OCT MIT
19 OCT MIT

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: Gerard & Raymond Tierney, Davagh Otra, Emyvale, Co. Monaghan.

Ref. No/ P1029-02

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 12 September 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 11 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

PP

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: Review of a current Integrated Pollution Prevention and Control License.

Class and Nature of Activity: 64

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

Applicant: Gerard & Raymond Tierney, c/o Mr Padraic Fay, CLW Environmental Planners Ltd, The Mews, 23 Farnham Street, Cavan.

L'ocation of Facility: Davagh Otra, Emyvale, Co. Monaghan.

Ref. No: P1029 - 02 EHIS Ref: 0661

Dear Claire,

I refer to a review of an existing IPPC licence for poultry production units belonging to the above named applicants. The IPPCL application for these units was submitted to the EPA on the 01 September 2017. The applicants EIS stated that there is currently only 1 fully operational poultry house to accommodate 35,000 broilers onsite however, during the site visited it was noted that there are 2 fully operational poultry units on site to accommodate 75,000 birds. Rearing of chickens is carried out from day olds until removed off site for meat production. The applicants stated that they are proposing to construct 1 further poultry house on the existing site which will accommodate 40,000 broilers which will bring the total amount of birds on site to 115,000.

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. Raymond Tierney on the 11 October 2017.

Site Location

The nearest non-family neighbour is located within 100m from the site however 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 neighbour is also in the business of poultry rearing. The applicant has stated that there have been no complaints and this office has not been made aware of any complaints. Appendix 3 has no Site Layout Plan attached.

Water Supply

The existing poultry houses are supplied with drinking water from Truagh Group Water Scheme. The applicant stated that the water 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.

There is one deep bored well on site which is currently being used by the applicant to supply water for the washing of the houses during clean down. The well head is protected by an unsuitable manhole cover and there does appear to be a risk of surface water penetrating the well as part of the yard concreted surface slopes towards where the well head is located. The applicant stated that he intends to do further works around the well head to protect it when he is constructing the third poultry house. The applicant stated that he tests the water from the well regularly using his own testing equipment. He stated that the well is in good working order and supplies clean uncontaminated water. The applicant however, does not maintain records for these tests and therefore no test results were available for examination.

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.

It is further recommended, if not already done so, 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:

Currently all manure is collected by the contractor CLR Co-op Ltd, Smithboro, Co Monaghan who removes the manure from the houses for the purpose of mushroom cultivation at various locations. No Manure is stored on site although suitable facilities exist to accommodate manure storage if necessary.

Wash Water

Wash water is collected and stored from the two existing poultry houses in two wash water tanks located to the front end of the two existing houses. 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.

The applicant had no high level monitors installed on the two existing wash water tanks 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 an 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 roofs drains directly onto piped stoned areas running down parallel with the houses on each side and finally discharged to a field drain. The current roof water drainage system and discharge points are not identified in any Appendices. Clean surface water from the concrete yards located at the front end of the existing poultry houses is drained via a natural fall to a piped drainage system and directly discharged to a field drain located on the roadside boundary of the applicant's yard.

There was no evidence at the time of the visit to suggest that the clean surface water is being contaminated. Due care however should be taken when birds are being removed from the house and during clean down as there is the potential for contamination of surface water at that stage and particularly during wet weather if the drainage stopper system, which is currently in place, is not correctly managed. The clean surface water discharge points are not identified on the EIS nor are the discharge points identified by the applicant on site. There is no risk of flooding as the installation is located on an elevated site.

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.

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.

<u>Waste</u>

There is adequate storage facilities provided for the storage of dead bird carcasses on site. The applicant advised that the carcasses are removed every fortnight or more often if necessary by the contractor Michael Galligan, Ballyconnell, Co Cavan however the Non-Technical Summary and, Appendix 5 states the contractor is College Proteins. Other waste is disposed of at Monaghan Co. Co. civic amenity centre or returned to the supplier for recycling.

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.

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 in light of the proposed increase in production and particularly during the construction phase.

Pest Control

Pest control measures are carried out by the applicant. A visual inspection of the bait boxes was carried out. The boxes were in good condition and located at regular intervals around the external perimeter of the 2 existing poultry houses. Pest control records were not available on-site.

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

It is further recommended that the applicant is advised to apply the same pest control measures to the proposed new 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.

Conclusion:

The facility appears to be operated in a very efficient manner by the applicant. 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