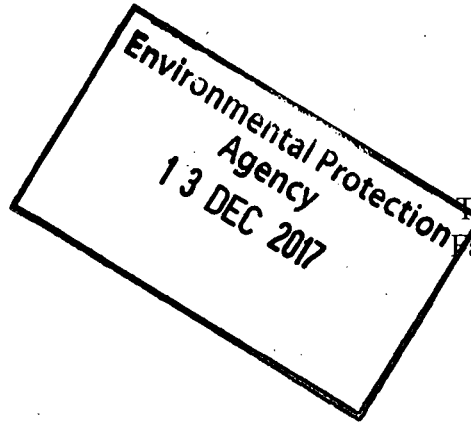




Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Sub. No 1

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
18 The Grange
Plantation Walk
Monaghan
Co. Monaghan
H18PW01



Tel No: +353 (0) 47-30906
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Ref/BC/CO'D

07 December 2017

Ms. Dorota Richards
Environmental Licensing Programme
Office of Climate, Licencing & Resource Use
Environmental Protection Agency Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford.

Re: Application for Integrated Pollution Prevention and Control License.

Class and Nature of Activity: The rearing of pigs in installations whether within the same complex or within 100 metres of the same complex, where the capacity exceeds 2,000 places for production pigs.

Applicant: John Kiernan, Ballinamoney, Bailieboro, Co. Cavan.

Ref. No: PO640 - 02

EHIS Ref: 0687

Dear Ms. Richards,

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 30/11/17:

- 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 04/12/2017.
- 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,



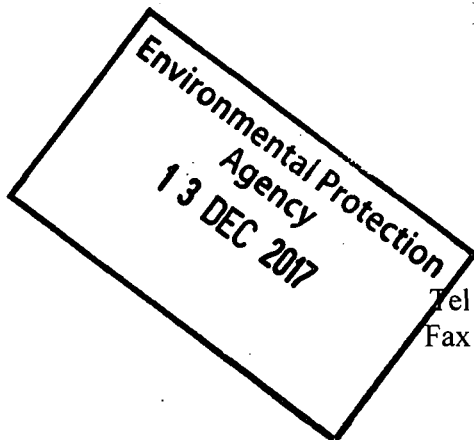
Claire O'Dwyer

Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE Dublin/North East
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07 December 2017

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

Re: Review of an Integrated Pollution Prevention and Control License.

Class and Nature of Activity:

The rearing of pigs in installations whether within the same complex or within 100 metres of the same complex, where the capacity exceeds 2,000 places.

Applicant: John Kiernan, Ballinamoney, Bailieboro, Co. Cavan.

Ref. No: PO640 - 02

EHIS Ref: 0687

Dear Claire,

I refer to the recent submission for a review of an IPPC license for piggery production units to the EPA from Mr. John Kiernan, Ballinamoney, Bailieboro, Co. Cavan. The IPPCL review application for these units was submitted to the EPA on 24/11/2017 and was accompanied by an EIS.

Currently the farm has 904 sows on-site and it is proposed that this will increase to 1350 sows following the decommissioning and de-construction of 7 of the existing pig houses and replaced with 3 newly constructed larger and more efficient units. All pigs born on the farm remain there until they reach the weight of 30/35kgs after which two thirds of them are removed off-site to alternative rearing accommodation and the remaining one third remain on-site until they reach market weight.

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 the applicant Mr. John Kiernan on 04 December 2017.

Site Location

The nearest neighbour is located approximately 300m from the facility. It was established that both the pig 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 there have been no complaints and this office has not been made aware of any complaints.

Soiled Water/ Slurry

Soiled water/slurry is stored in tanks beneath the slatted pig houses and removed from the farm by the applicant and supplied to customer farmers. A list of customer farmers is maintained on-site. The applicant maintains a triplicate book which records all slurry consignments detailing the dates of removal, the quantities and name of person removing it. The applicant stated that customer farmers spread slurry in line with the Nitrates Directive. The applicant stated that he maintains a nutrient plan for all his customers to help avoid nutrient accumulation on the said lands.

Surface Water

Surface water is generated from roofs of the pig units and the concrete yards surrounding the units. There is one storm water discharge point into a stream running along the road running parallel to the site. The discharge point is not identified at the location of discharge however it is identified on-site close to the discharge point. The applicant stated that a surface water quality monitoring scheme is in place to determine water quality at the discharge point.

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

It is also 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 pig unit. This is particularly important when considering the significant increase in production.

It is further recommended that the applicant take all precautions during clean down and when loading pigs to ensure that soiled water or slurry does not enter the clean surface or storm water drainage system and that such precautions are applied to the proposed new units.

Well

There is No. 1 deep bored well on site. This well supplies all the drinking water for the pigs, wash water of the units and drinking water for employees. Annual microbiological testing of the well has been satisfactory to date according to the applicant.

The well is located in an indoor area however; the well head is not fully protected from the possibility of rodents or other objects falling into the well which may in turn inadvertently cause contamination to the well water. The applicant stated that the room in which the well exists is being de-constructed and replaced with a new structure. This may increase significantly the risk of the well becoming contaminated if the well is not

adequately protected during this period.

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

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.

Oil Storage

There is one oil storage tank on-site. The tank is self bunded.

Waste

The correct storage and disposal of dead pig carcasses and used fluorescent light bulbs was discussed with the applicant. All waste is adequately stored in a suitable container/area where they are protected from breakage and removed off site as soon as practicable. Dead pig carcasses are removed off-site weekly by Animal By-Products contractor College Proteins, Nobber, Co. Meath. This arrangement is to continue after the new facility commences.

Odour

Emissions to atmosphere from this farm include the expelling of warm air from the extract ventilation system in the buildings and odour and gas volatilization from the organic manure. Increased emissions may at times be associated with the loading of pigs and/or the loading of pig manure. This office has not received any odour complaints regarding this facility. At the time of the site visit odour levels appeared acceptable for this type of farming activity.

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. This office has not received any noise complaints regarding this facility. At the time of the site visit noise levels appeared acceptable for this type of farming activity.

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 maintained by the applicant. A visual inspection of the bait boxes was carried out. The applicant uses pipes as bait points. The bait points are located at regular intervals around the site however, at the time of the visit there was no bait in the pipes. The applicant advised that birds are removing the bait from the bait pipes. The applicant maintains pest control records on site. The applicant plans to apply the same pest control measures to the new development.

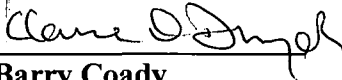
It is recommended that the applicant is further advised of his obligations in terms of vermin control.

It is further recommended that the applicant is advised to ensure that the bait points are monitored regularly to ensure an adequate amount of bait is present and that pest control records and measures are accurately maintained by the applicant on site. It is recommended that the applicant invest in specifically manufactured bait boxes to reduce the risk of other non-rodent animals being inadvertently poisoned. Pest control measures should be extended to the proposed new units.

Conclusion:

The facility is operated in a very efficient manner by the applicant. Other than the issues stated above, the Environmental Health Service has no further concerns at this time regarding this facility.

Yours faithfully,



PP

Barry Coady
Environmental Health Officer

The Health Service Executive is continually striving to improve the quality of its service. If you have any feedback on your recent interaction with the Environmental Health Service please contact Claire O'Dwyer, Principal Environmental Health Officer on (047 30906).

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