



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
The Arcade
Main Street
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Co Cavan

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Ref/ BC/CO'D

16 April 2018

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 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: AK Agriculture Ltd, 16 Townhall Street, Cavan, Co. Cavan

Location of facility: Drumborisk, Drum, Co. Monaghan

Ref. No/ P1071- 01

EHIS Ref: 0736

To whom it may concern;

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 20 March 2018:

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

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

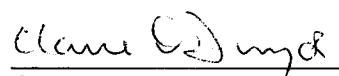
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 05 April 2018.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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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Principal Environmental Health Officer
Environmental Health Office
The Arcade
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Ref. No/ P1071- 01

EHIS Ref: 0736

Dear Claire,

I refer to an application for an IPPC licence for No. 2 proposed poultry houses from the above named applicant. The IPPCL application for these units was submitted to the EPA on the 12 March 2018. The applicant is proposing to construct No. 2 poultry houses on what is currently a green-field site located on the applicants existing farm. The two houses will have the capacity to accommodate approximately 100,000 broilers on-site.

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. Kieran O'Halloran on the 05 April 2018.

Site Location

The proposed development is located in a rural setting approximately 2km outside the village of Drum and adjacent to a lake namely Lough Drum. The nearest neighbours are located over 250m approximately from the site. It was established that the applicants existing farm and the nearest neighbours have been living side by side for a long number of years without any issues arising. The applicant stated that an objection had been lodged to Monaghan County Council in regard to the positioning of the poultry houses however this matter has now been resolved. This office has not been made aware of any further complaints.

Water Supply

The applicant advised that the proposed houses will be supplied with drinking water from the Drumgole Group Water Scheme. There is a bored well on site however the applicant has stated that this well is very shallow with a very limited supply of water and therefore it is not envisaged that this water supply will be used in connection with the proposed development. The well is currently used to supply drinking water to the existing farm animals namely cattle. This office is not aware of existing issues with Drumgole Group Water Scheme.

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 has stated in his application form that he intends to use ground water as a water source for the facility.

It is recommended that if the applicant decides to develop the bored well for use at the facility that a groundwater protection plan is 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 a licensed contractor who will remove the manure from the houses for the purpose of mushroom cultivation at various locations. The applicant was uncertain as to whom the contractor will be and the applicant's documentation did not mention the contractor. It was not possible to view the applicants EIS on the EPA website.

That applicant stated that no manure will be stored on site however if in the event manure needs to be stored there are currently no suitable facilities on the existing farm to accommodate manure storage.

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 rear 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:

- 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 spread on the applicants farm 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.

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.

The applicant stated that the site has never flooded and there is no risk of future flooding as the facility 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, in this case College Proteins, as often as necessary and in any event before the storage containers overflow. That all other waste products are disposed of at Monaghan Co. Co. civic amenity centre or returned to the supplier for recycling.

Odour

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

Noise and Dust

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

Pest Control

The applicant intends to employ a pest control contractor or perhaps administer pest control measures himself.

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

It is further recommended that the applicant is advised to apply adequate 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.

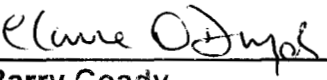
Oil Storage

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 houses.

Conclusion:

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

Yours faithfully,


B.C. **Barry Coady**
Environmental Health Officer

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