



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

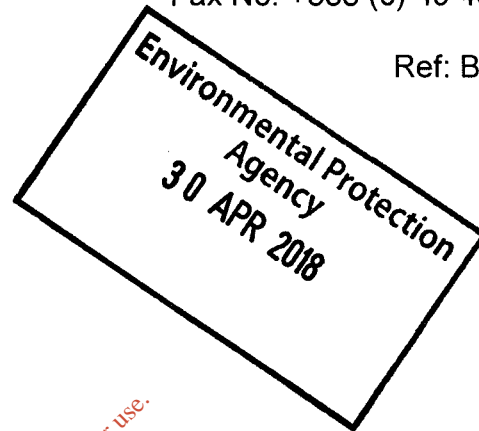
Environmental Health Service
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Ref: BC/COD

24 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 License Review.

Class and Nature of Activity: 6.1

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

Applicant: Vincent Quinn, Derrylusk, Ballybay, Co. Monaghan.

Location of Facility: Cornanagh, Ballybay, Co. Monaghan.

Ref. No: P0871-02 EHIS Ref: 0744

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 05 April 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 18 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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Ms. Claire O'Dwyer
A/Principal Environmental Health Officer
Environmental Health Office
The Arcade
Main Street
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Co. Cavan



Re: Application for Integrated Pollution Prevention and Control License Review.

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Dear Claire,

I refer to a review of an existing IPPC licence for poultry production units belonging to the above named applicant. The IPPCL review application for these units was submitted to the EPA on the 15 March 2018. There are currently 3 fully operational poultry houses to accommodate 82 – 84,000 broilers on-site. The applicant is proposing to remove existing mushroom houses, which are located on the site of the existing poultry units and construct an additional poultry house in its stead. The proposed unit will increase capacity to 100,000 broilers.

The following are observations made whilst reviewing the said application, EIS and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during the site visit and discussions with Mr. Vincent Quinn on the 18 April 2018.

Site Location:

The site in question is located in a rural area within the townland of Cornanagh. The site is 1.69 hectares in area and it is accessed via a local third class road. It is 5.4 km north-east of Ballybay on the R184 Ballybay - Clontibret Road. The nearest non-family neighbour is located over 250m approximately from the site. 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 applicant has stated that there have been no complaints and this office has not been made aware of any complaints.

Water Supply:

There is no Group Water Scheme (GWS) connected to the site. The three existing houses are all serviced by two deep bored wells on-site. Both wells are tested annually as per Bord Bia requirements and have been satisfactory to date according to the applicant. There are no treatment systems on the wells due to satisfactory water results to date. It is envisaged that the existing two wells will supply the proposed poultry house also. The two wells are located at the front end of the existing units namely at house No. 1 and house No. 3 respectively. Due to their location in terms of their close proximity to the poultry houses, the gradient of the concrete yards and the unsatisfactory protection currently being provided to the well heads by the applicant, both wells are extremely vulnerable to possible contamination by either surface water or soiled water. At the time of the site visit it appeared that soiled water had penetrated the current covers of both wells as residue of what appeared to be manure was present in the area surrounding the well heads. Both wells are flush with the associated concrete yard surface and as such are also susceptible to surface water penetration. The covers used to protect the well heads are unsuitable and provide little protection against penetration of soiled or surface water.

It is recommended that the applicant take immediate action to protect both wells from possible contamination. The covers, covering the well heads, should be fit for purpose and should be sufficiently raised above the concrete yard surface using impermeable materials to prevent the possibility of soiled or surface water penetration. It is further recommended that in the conditions of the applicants licence, it is clearly stipulated, that the applicant has a legal responsibility to identify possible sources of contamination to water sources from his facility and act accordingly.

Manure:

Currently all manure is collected by the contractor C.L.R. Co-op Ltd (T/A Poultry Manure Supplies) located at Mount Louise, Smithboro, Co. Monaghan who removes the manure from the houses and delivers it to mushroom composting facilities or crop growers. It is intended that this arrangement will continue when the proposed new house is in operation. The applicant stated that there are no facilities on-site to store manure however; the applicant has off-site storage facilities which haven't been used for manure storage to date as the contractor has always removed the manure immediately following each cycle.

Soiled Water:

Currently, soiled water from the three existing houses is contained in one large tank located to the front end of house No. 3. The wash water tank however is not indicated on the site plan in appendix 2. The applicant stated that he intends to build a new wash water tank for the proposed development.

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 tank has reached its capacity the tank is emptied and the contents spread on the applicants adjoining lands or mixed in the cattle slurry tank and subsequently 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 two high level monitors installed on the wash water tank at the time of the site visit.

It is recommended, given the close proximity of the soiled water tank to a water body, that the applicant maintains the high level monitors in working order and ensures that they are monitored regularly 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.

When the poultry have reached the age for slaughter they are loaded at the front end of each house. It was noted that there is potential for manure to be carried out onto the concrete yard during the loading process.

During the cleaning of the yard or during wet weather there is potential for quantities for soiled wash water to enter the clean surface water drainage system and subsequently discharged into the land drain.

It was established however that the potential for contamination of the clean surface water may only occur during the cleaning process and not during day to day operations. The risks of contamination also refer to the 2 x bored wells which are located in the area referred to above.

It is recommended that the applicant is advised to take all due care to ensure that wash water is not discharged to the clean surface water land drain or penetrate either of the bored wells during the cleaning process as per licence. That the stopper system, currently in place to direct either soiled water or clean water to their correct destination, is managed and monitored correctly and that conditions of the licence require the same precautions are applied to the proposed development.

It is further recommended that if poultry houses are emptied during wet weather, that manure spillage is eliminated as far as reasonable possible and in any event is cleaned up before it enters the clean surface water discharge point to avoid any potential water pollution incidents. That conditions of the licence require the same precautions are applied to the proposed development.

The applicant stated that he empties the wash water tank regularly and either mixes the soiled water in the cattle slurry tank or spreads it on his land to ensure no overflow occurs. In any event it is subsequently spread on the family land surrounding the site in accordance with the Nitrates Directive.

It is recommended, given the significant increase in production, that a Nutrient Management Plan (NMP) should be maintained by the applicant on site for the management of poultry manure and wash-water arising at the unit and should include:

- Calculation of the quantity of manure and the amount of nutrients available from manure including any manure or other wastes imported.
- The results of soil fertility and drainage tests on existing or proposed land spreading areas.
- A representative soil sample, to a depth of 10cm, should normally be taken biennially from every 2 to 4 hectares and at least one per farm. However, where soil types are similar and cropping and treatments of the lands were the same during the previous 5 years or more, a composite sample from an area up to 12 hectares is acceptable.
- An assessment of the relationships between manure application rates, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- Ordinance Survey Maps to a scale of 1:10,560 showing the location of the said land spreading areas and all environmentally sensitive features on the lands or in their vicinity; including *inter alia* dwellings houses and sensitive buildings, drains, streams, watercourses and other sources of water supply.
- Agreements between 'importers' and 'exporters' of all animal manures or other wastes are required.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

It is further recommended that the applicant is advised of Batneec Guidance Note Section 4.6 Spreading of Poultry Manure and the conditions therein.

Surface/Storm Water:

There are no streams within the application site however; there is a land drain along the south eastern boundary, to the right of house No. 3, which is a tributary of the Six Mile lake stream c. 400m north of the site. The application site lies within the Neagh-Bann River Basin District, the Lough Neagh and Lower Bann Hydrometric Area and Catchment and the Clontibret Stream Sub-catchment and Sub-Basin. There are no streams within or immediately adjacent to the application site. The closest water features to the site includes a network of drains which begin 207m north of the site. A small lake known as Six Mile Lake is also 705m east of the application site. Water flows out of this lake into a stream that flows in a westerly direction north of the site, whilst the drains to the north of the site drain towards this stream. This stream (Six Mile Lake Stream) flows in a northerly direction until its confluence with the Clontibret Stream near Castleshane. Surface/storm water is generated from the roofs of the existing poultry units and associated concrete yards and drained to a land drain located to the right hand side of house No. 3 along the south eastern boundary, where it is discharged. The discharge point is not identified in appendix 2 of the EIS however; the location is identified on-site by the applicant. The surface/storm water from the proposed development will be connected to a separate discharge system however this water will be discharged to the same land drain as above through a new discharge point yet to be completed.

It is recommended that the licence stipulate that the discharge point for surface and storm water from the proposed development is identified on-site 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.

Waste:

As per licence there is adequate storage facilities provided for the storage of dead bird carcasses on site. The applicant stated that the carcasses are removed every fortnight or more often if necessary, by College Proteins Ltd, as stated in the EIS. It was also confirmed by the applicant that the same contractor will be employed to remove dead birds associated with the proposed development.

It is recommended that all other waste products are disposed of at Monaghan Co. Co. civic amenity centre or returned to the supplier for recycling in a timely manner and that there is no accumulation of waste on site.

Oil Storage:

The applicant confirmed that there are no oil storage facilities on-site and that gas will be used to heat the existing houses and the proposed house. A back-up generator will be used on-site which will be powered by diesel however, the generator incorporates a self bunded system to avoid any accidental leakage of fuel to surface or ground water.

Chemicals:

Chemicals are stored in a bunded container in a designated store.

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 once every 8-10 weeks for approximately 4 hours. 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 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 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 that the applicant be advised to continue to monitor noise from this installation 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 well baited and located at regular intervals around the houses. Records of pest control measures are being maintained by the applicant.

It is recommended that the applicant ensures the same pest control measures are applied to the proposed development and that the bait boxes continue to be monitored regularly to ensure an adequate amount of bait is present in the boxes and that pest control records and measures continue to be maintained on site as per licence.

Conclusion:

The facility appears to be operated in a very efficient manner by the applicant. However, the HSE is concerned about the issue highlighted in this report regarding both bored wells. The HSE would request that this matter is dealt with by the EPA as a matter of urgency. Other than the above issue the HSE have no further concerns at this time regarding this facility.

Yours faithfully,


Barry Coady
Environmental Health Officer

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