



Seirbhíse Sláinte na hÉireann
Health Service Executive

Sub # 2

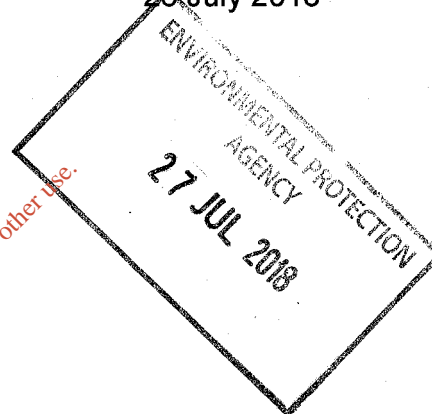
Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
The Arcade
Main Street
Cavan
Co Cavan

Tel No: +353 (0) 49 4373418
Fax No: +353 (0) 49 4373427

Ref/ BC /CO'D

26 July 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 an Industrial Emissions License.

Class and Nature of Activity: 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: Darren Pepper, Maghernacaldry, Cootehill, Co. Cavan.

Location of facility: Knockateane, Cootehill, Co. Cavan.

Ref. No: P1083-01 EHIS Ref: 0813

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 12 July 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.

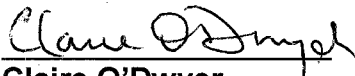
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 24 July 2018.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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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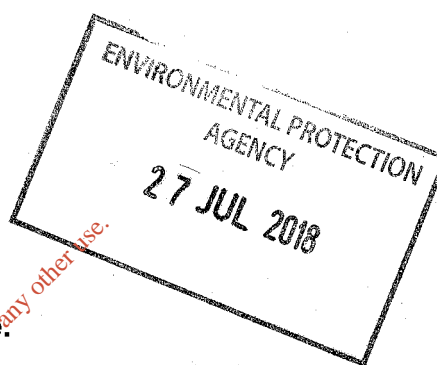
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Ms. Claire O'Dwyer
Principal Environmental Health Officer
Environmental Health Office
The Arcade
Main Street
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Re: Application for an Industrial Emissions License.

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Dear Claire,

I refer to an application for an IPPC licence for No. 2 poultry houses belonging to the above named applicant. The IPPCL application for these unit was submitted to the EPA on the 28 June 2018. There is currently 1 fully operational poultry house to accommodate 39,800 broilers onsite which operates under the EPA licence threshold of 40,000 birds. The applicant is proposing to construct an additional No. 2 poultry houses which will increase capacity to 130,000 broilers on site and will therefore require a licence as it exceeds the threshold.

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. Darren Pepper on the 24 July 2018.

Site Location:

The site in question is located in a rural area within the townland of Knockateane. Access to the site is via an existing service road that is just off a local, third class road. The area of the site is 2.21 hectares, including the service road. It is 3.6km south-east of Cootehill. The site is well serviced by the current road infrastructure and is accessed by a local road network which subsequently connects with the Regional Routes, the R191 and/or the R192 c. 1 km from the site. The development for which permission is sought would be located adjacent to the existing poultry house, and set back c. 300m from the adjoining public road. The nearest neighbour is located approximately 200m 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.

Manure:

Currently all manure is collected by McCartney Contractors Ltd who removes the manure from the existing house and delivers it to mushroom composting facilities or crop growers. It is intended that this arrangement will continue when the proposed new poultry houses are in operation. There is no existing manure store however the applicant has stated that to date there has been no reason to store manure as the contractor has always removed the manure as the house is being cleaned.

Soiled Water:

Currently, soiled water from the existing poultry house is diverted to a soiled water tank located to the front end of the existing house via a piped drainage system. The applicant stated that the proposed poultry houses will have individual soiled water tanks constructed to service the proposed houses.

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 proposes that when the new wash water tank is reaching its capacity the tank will be emptied and subsequently spread on the family land surrounding the site at the appropriate time of the year and in accordance with the Nitrate directive or mixed in the cattle slurry tank.

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 particularly S.I. 605 of 2017.

There is currently no high level monitor on the existing soiled water tank.

It is recommended that the applicant install high level monitors on the existing and proposed wash water tank to minimise the risk of unintentional overflow.

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

When the yard is being cleaned or during wet weather there is potential for quantities for soiled wash water to enter the clean surface water drainage system and subsequently discharges into a land drain. It was established however that the potential for contamination of the clean surface water is limited and may only occur during the cleaning process and not during day to day operations. The applicant stated that precautions are taken during clean down to ensure soiled water does not enter the clean surface water drainage system by the use of a diversion drain system which diverts soiled water to the soiled water tank during clean down.

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 during the cleaning process of the existing poultry house or the proposed poultry houses.

There is currently no Nutrient Management Plan (NMP) in place.

It is recommended, given the significant increase in production and the size of the surrounding land on which soiled water can be spread, that the applicant develop a Nutrient Management Plan (NMP) for the surrounding lands on which soiled water will be spread. That the Nutrient Management Plan (NMP) is maintained by the applicant on site for the management of soiled-water arising at the facility 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 Water / Storm Water:

The application site lies within the Erne Hydrometric Area and Catchment and the Annalee Sub-catchment and Sub-Basin. There is a stream flowing close to the eastern boundary of the application site. Clean surface water from the application site will be directed into this stream. This stream flows in a southerly direction towards the Annalee River, which is 800m south of the application site. The EPA have classified the ecological status of the Annalee River and its tributaries which are close to the application site as good. Under the requirements of the Water Framework Directive, this is satisfactory and this status must be maintained. Surface water and storm water are drained via a piped drainage system from the existing poultry house and discharged to a land drain at the front end of the facility. The applicant proposes to discharge all surface water and storm water arising from the proposed poultry houses to the same land drain.

The existing discharge point is not identified on the EIS nor is it identified on 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 point.

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.

Water Supply:

The applicant advised that the existing poultry house is being supplied with water from the Barraghy GWS. The water is test annually by the applicant in line with Bord Bia requirements. This office is not aware of any existing issues with the Barraghy GWS. There is currently no bored well on site.

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

Waste:

There is currently 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 the contractor College Proteins Ltd and that the same arrangement is proposed for the new facility.

It is recommended, given the increase in capacity, that adequate and suitable storage facilities are maintained by the applicant for the storage of dead bird carcasses on site and removed as often as necessary and in any event before the storage containers overflow.

It is recommended that all other waste products are disposed of at Cavan 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.

Odour:

Emissions to atmosphere from this farm include normal respiration gases and odours emitted from the existing house 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 in light of the proposed increase in production and particularly during the construction phase.

Pest Control:

Pest control measures currently are carried out by a contractor ECO Labs. It is proposed that this arrangement will continue for the new facility. A visual inspection of the bait boxes was carried out. The boxes were well baited and located at regular intervals around the existing house. Records of pest control measures are being maintained by the applicant on-site.

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.

Oil Storage:

The applicant stated that he does not currently store oil on the existing site nor does he intend to store oil on the proposed site and that gas will continue to be used to heat the entire facility. A back-up generator is used on-site which will be powered by diesel. The generator however does not incorporate a self bunded system to avoid any accidental leakage of fuel to surface or ground water. The location of the generator on-site does not pose a risk to water courses/surface water in the area should an oil spill occur however may pose a risk to ground water. The applicant has proposed to build a bunded area around the generator during construction of the proposed development.

It is recommended that a condition of the licence stipulate that the applicant, in accordance with Batneec Guidance, should have all oil storage tanks on site placed on impervious bases and should be located within oil tight bunds, capable of holding 110% of the volume of the largest tank within the bund.

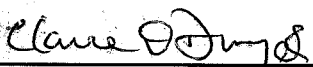
Chemical Storage

All chemicals on-site are currently stored safely in a bunded area in a designated store.

Conclusion:

The current facility appears to be operated in a very efficient manner by the applicant. Other than the observations stated above, the HSE have no further concerns at this time regarding this facility.

Yours faithfully,


PP **Barry Coady**
Environmental Health Officer