

Sub. #2



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
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Ref: BC/COD

24 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 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: Beech Row Farms Ltd, Doagheys, Glaslough Co. Monaghan.

Location of Facility: Doagheys, Glaslough Co. Monaghan.

Ref. No: P1081- 01

EHIS Ref: 0808

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 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,



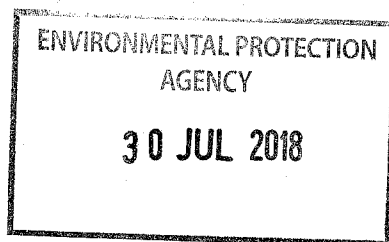
Claire O'Dwyer
Principal Environmental Health Officer

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Ms. Claire O'Dwyer
Principal Environmental Health Officer
Environmental Health Office
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Dear Claire,

I refer to an application for an IPPC licence for a poultry production unit belonging to the above named applicant. The IPPCL application for this unit was submitted to the EPA on the 07 June 2018. There is currently 1 fully operational poultry house to accommodate 22,000 broilers onsite and operates under the EPA licence threshold of 40,000 birds. The applicant is proposing to construct an additional poultry house which will increase capacity to 65,000 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. Brian McArdle on the 18 July 2018.

Site Location:

The site in question is located in a rural area within the townland of Doagheys. Access to the site is just off a local road. The area of the site is 0.867 hectares and it is 2.2km south of Glaslough and 6 km north-east of Monahan. The site is well serviced by the current road infrastructure and is accessed by a local road network which subsequently connects with the regional route, the R185 Monaghan - Glaslough road, c 0.25 Km's, and the N2 national primary route c. 4 Km's from the site. The development for which a licence is sought would be located on the existing farm and to the rear of the existing poultry house and the applicant's home. The nearest non-family neighbour is located within approximately 150m of 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 the contractor George Coulson Tirmmey, Clones, Co. Monaghan 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 house is 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 the cattle slurry tank on-site via a piped drainage system which the applicant has stated has adequate capacity to accommodate the soiled water produced from the current house. The applicant stated that the proposed poultry house will have a separate soiled water tank constructed to service the 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 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.

It is recommended that the applicant install a high level monitor on the 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 of soiled wash water to enter the clean surface water drainage system and subsequently discharge into the 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.

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 house. 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.

The applicant stated that he currently monitors ground nutrients on his lands via a Nutrient Management Plan (NMP).

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 review this plan. 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:

The application site lies within the Lough Neagh and Lower Bann Hydrometric Area and Catchment, and the Blackwater (Monaghan) Sub-Catchment/Sub-Basin. There are no drains or streams within the application site. The nearest water feature to the site is a drain which occurs along the road and which is 27m north of the site boundary. Clean surface water from the facility is currently directed into this drain from a catchment tank located in the applicants yard. This drain leads towards the Blackwater, which is 288m south of the site. The EPA have defined the ecological status of the Blackwater River at its closest point to the application site as moderate. Under the requirements of the Water Framework Directive in Ireland, this is unsatisfactory and good status must be achieved by 2021. The drainage from the new house will be connected to the existing discharge system or through a new discharge point yet to be completed. The applicant stated that he is to carry out a suitability assessment for drainage to determine which option is more suitable in terms of the capability of the existing drainage system to deal with increased quantities of storm and surface water and ground gradient.

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 Tyholland/Glaslough GWS. The water is test regularly by the operators of the scheme. This office is not aware of any existing issues with the Tyholland/Glaslough GWS. There is presently no bored well on site however the applicant proposes to bore a well to supply water to the proposed poultry house.

It is recommended 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.

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 Michael Galligan, Gortnaleck, Ballyconnell, Co. Cavan 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 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.

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 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 houses. 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 currently store oil on the existing site nor does he intend to store oil on the proposed site and that gas will be used to heat both houses. A back-up generator will be used on-site which will be powered by diesel however, the generator will incorporate a self bunded system to avoid any accidental leakage of fuel to surface or ground water.

Chemical Storage

Chemicals are currently stored in a coal bunker to the front of the existing poultry house which not suitably bunded.

It is recommended that the applicant be advised to store all chemicals 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,



Barry Coady
Environmental Health Officer

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