



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

An Roinn Sláinte Chomhshaoil,
FSS Baile Átha Cliath & Lár Laighin,
Aonad 7C,
Páirc Chorpadaídeach Loch Siabhair
Baile Roibín, An Muileann gCearr
Co. na hIarmhí, N91 P449

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Environmental Health Department,
HSE Dublin Mid-Leinster,
Unit 7C,
Lough Sheever Corporate Park,
Robinstown, Mullingar,
Co Westmeath, N91 P449

Environmental Licensing Programme
Office of Environmental Sustainability
EPA
Headquarters
PO Box 3000
Johnstown House Castle Estate
County Wexford

Date: 26th July 2018



Re Application for: Industrial Emissions (IE) Licence

Class and Nature of Activity: The rearing of pigs in an installation where the capacity exceeds - (b) 2,000 places for production pigs which are over 30kg

Applicant: Clondrisse Pig Farm Limited, Clondrisse Pig Farm, Clondrisse, Killynan (Pratt), Cloghan, Westmeath

Location of Facility: Joristown Upper, Killucan, Westmeath, N91 HK27

EPA Ref. No: P0975-02

EHIS Ref: 0798

Dear Sir / Madam,

Please find enclosed the HSE consultation report in relation to the above proposal.

If you have any queries regarding any of these reports, the initial contact is Paul Mc Guinness, Principal Environmental Health Officer who will refer your query to the appropriate person.

The following HSE departments were made aware of the consultation request for the proposed development on (insert date provided by national office).

- HSE Health Protection
- HSE Emergency Management
- HSE Estates

The EH service response to the proposal is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office on 22nd June 2018 by The Environmental Protection Agency.
- A site visit was conducted on 19th July 2018 and a meeting was held with William Murphy on the same date.
- 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;
 - Soils , Geology and Hydrogeology
 - Odour
 - Noise
 - Environmental Management Techniques

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Paul Mc Guinness, Environmental Health Officer Unit 7C Lough Sheever Corporate Park, Robinstown, Mullingar, County Westmeath.

Yours Sincerely



Principal Environmental Health Officer

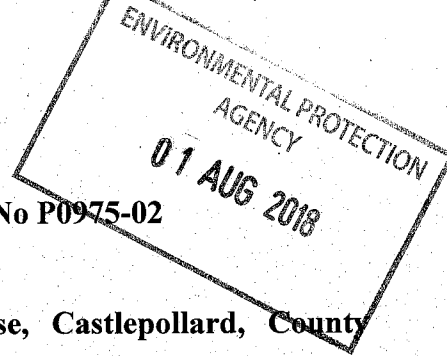


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26th July 2018

Re/ **Industrial Emissions (IE) Licence Application No P0975-02**

Name & Address of Applicant;

Clondrisse Pig Farm Limited, Gillardstown House, Castlepollard, County Westmeath.

Class & Nature of Activity; The rearing of pigs in an installation where the capacity exceeds 2,000 places for production pigs which are over 30kg.

The following are observations made whilst reviewing the said application in conjunction with EPA guidance documents and associated legislation.

This office would like to highlight that the Environmental Impact Statement (EIS) included with this Industrial Emissions License is dated November 2011.

Furthermore, whilst this office has not received any complaints directly in respect of this facility, a number of third party submissions have been observed with regard to the previously granted IE Licence EPA Reg. No. P0975-01.

Soils, Geology and Hydrogeology

The following statements have been included by the applicant in Section 7 (Emissions) of the Application Form for this Industrial Emissions License;

7.1 Emissions to Ground (including disposal of sanitary effluent and potential emissions to ground) and Land

Emission Type	Applicable
Emissions to Ground (including disposal of sanitary effluent and potential emissions to ground) and Landspreading	Yes
Storm Water Discharges	Yes

a) There is no further information included with this application in respect of Emissions to Ground.

The accompanying EIS states (page 7) "In order to protect the local ground and surface water resources, the principles of nutrient management planning will be used in land spreading of pig slurry generated here" and "A site specific nutrient

management plan, incorporated in an agri-environmental report, to guide disposal to certain agricultural lands is included in Appendix 2”.

No information has been included with the Appendix 2 (Agri-environmental Report and Nutrient Management Plan).

Furthermore, It has been stated in Section 3.1 Impact on Water of the accompanying Environmental Impact Statement (page 8) to this Industrial Emissions License application that “Pig slurry is applied to lands that have sufficient overburden cover to treat slurry applied and thereby protect groundwater”, and “Pig slurry application is prohibited in the buffer zones around wells, watercourses, rivers, lakes and private residences and public residences”.

As outlined in the Environmental Health Submission re Industrial Emissions Licence Reg.No. P0975-01, a comprehensive assessment of the potential effects of this development and associated activities on groundwater has not been detailed.

The nature of the bedrock, depth to the water table, classification of the aquifer, sub soil classification and permeability, source protection area data, identification of any karst features and direction of groundwater flow should be included in such an assessment.

The information included with this IE License application does not allow this office to determine if the potential effects of this development on local drinking water sources have been considered by Clondrisse Pig Farm Limited.

Consideration should be given to potentially vulnerable water extraction points in the locale of the development. This office would suggest that a more detailed survey of water extraction points be presented in an effort to identify the potential risk to public health from polluted groundwater which is abstracted for consumption presently or in future.

- b) The information accompanying this Industrial Emissions License outlines that there are 2 Stormwater Inspection points at SW 1 658643(E) 753037(N) and SW 2 658782(E) 753054(N) and that storm water discharges to ground.

Section 3.1 Impact on Water of the accompanying Environmental Impact Statement (page 6) states “The site at Joristown Upper on which this development is proposed is drained by small man made drainage channels which flow generally south and east to the River Deel located about 1.2km away. The River Deel is a tributary to the River Boyne and is located in the surface water area HA07”.

During a visit to this site on 19th July 2018, what appears to be a third surface water inspection / distribution point was observed which discharges to a “soakpit” in the adjacent field. This office recommends that all surface water inspection and distribution points be clearly identified in supporting documentation for the IE License application.

The information accompanying this License Application as regards the water quality of rivers and associated tributaries is such that this office cannot comment on the potential impact of this piggery on surface waters.

Odour

During a visit to this site on 19th July 2018, there were no obvious odour issues in the vicinity of the pig installation.

This office notes information in the Industrial Emissions License application that BAT Conclusion 26 (BAT is to periodically monitor odour emissions to air) be implemented in line with Updated License Requirements (Applicability – 01 January 2019).

A more thorough assessment of the fugitive emissions which may emanate from this pig rearing facility should be detailed and their off-site impacts (if any) discussed.

Noise

The developer has stated in the accompanying EIS that “The proposed piggery extension will not cause a noise nuisance in the locality”.

During a visit to this site on 19th July 2018, there were no obvious noise issues.

This office considers that due regard be given to this matter and that some quantification (where appropriate) for noise emissions and mitigation measures (if applicable) be described.

Due regard should be given to potential noise problems at defined Noise Sensitive Locations. Distances to noise sources, peak noise events, noise duration and times should also be discussed.

Environmental Management Techniques

Section 9.1 Environmental Management Techniques (EPA Application Form) contains limited information in respect of;

- Accident Prevention Measures
- Vermin Control

Accident Prevention Measures

(i) Facility / Equipment Cleansing

There is no discussion in the submitted information on cleansing procedures at this development. It is requested that consideration be given to the description of pig house cleaning, equipment cleaning, etc. and the potential associated effects on the environment.

It was noted during the site visit that cleaning chemicals and associated equipment are stored in an “un-bunded” store room. The appropriate storage facilities for the safe storage of these materials should be demonstrated.

(ii) Hydrocarbon storage

At the time of the site visit, I observed 2 onsite oil tanks (heating oil tank and electricity generator oil tank) which are “un-bunded”.

It is suggested that more thorough consideration be given to mitigation measures which may be employed to reduce potential impacts on public health and the environment in the event of accidental spillage, tank failure, etc.

Vermin Control

The Environmental Impact Statement does not outline the appropriate vermin control measures which should be in place to minimise the likelihood of a pest problem developing at the facility. This should be addressed.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Paul McGuinness". The signature is written in a cursive style and is positioned above a horizontal line.

Paul McGuinness
Principal Environmental Health Officer

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