



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission no. 1

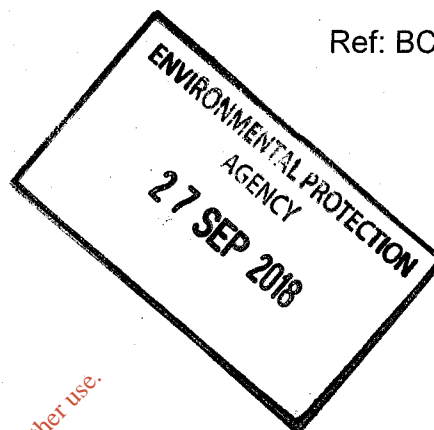
Environmental Health Service
HSE Dublin/North East
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Ref: BC/COD

25 September 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: Mr Patrick Greenan, Kilmore East, Rockcorry, Co. Monaghan.

Location of Facility: Kilmore East, Rockcorry, Co. Monaghan.

Ref. No: P1086- 01

EHIS Ref: 0824

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 27 August 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.

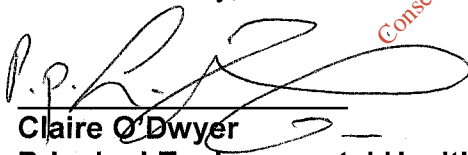
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 21 September 2018.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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
The Arcade
Main Street
Cavan
Co. Cavan

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

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EHIS Ref: 0824

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 08 August 2018. There is currently 1 fully operational poultry house to accommodate 39,500 broilers onsite and operates under the EPA licence threshold of 40,000 birds. The applicant is proposing to construct an additional No. 2 poultry houses with an extension to the existing poultry house which will increase capacity to 190,000 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 a site visit and discussions with the applicant Mr. Patrick Greenan on the 21 September 2018.

Site Location:

The site in question is located in a rural area within the townland of Kilmore East and is accessed via a third class road between the local regional roads R183 and R189. The site is c.4.2km's north of Rockcorry and c.11Km's west of Ballybay. The area of the site is 2.11 hectares and is owned by the applicant. There is an additional c.35 hectares of land surrounding the site which is also owned by the applicant. The development for which a licence is sought would be located on the existing site and to the rear of the existing poultry house which is neighbouring the applicant's home. The nearest non-family neighbour is located within approximately 300m of the site. It was established that both the applicant and the nearest neighbour have been living side by side for a long number of years without any issues arising. The applicant stated that the neighbor has been advised of the proposed development and has not objected. The applicant has stated that there have been no complaints concerning the existing poultry unit and this office has not been made aware of any complaints.

Manure:

Currently all manure is collected by the contractor CLR Co-op Ltd, Mount Louise, Smithboro, Co. Monaghan who removes the manure from the existing house and delivers it to compost facilities / recipient farmers. It is intended that this arrangement will continue when the proposed new houses are in operation. There is an existing manure store on-site 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 current house is being cleaned.

Soiled Water:

Currently, soiled water from the existing poultry house is diverted, during the cleaning process, from the front of the existing poultry house via a piped system to a wash water tank. The applicant has stated that the wash water tank has adequate capacity to accommodate the soiled water produced from the current house. The applicant stated that the proposed poultry houses will each have separate soiled water tanks constructed to service 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.**

As is the case with the existing wash water, the applicant proposes that when the new wash water tanks are reaching their capacity, the tanks will be emptied and the wash water 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 particularly S.I. 605 of 2017.

The existing wash water tank has no high level monitor installed.

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

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 does not currently monitor 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.

Surface/Storm Water:

The application site lies within the Erne Hydrometric Area and Catchment and the Dromore Sub-Catchment and Sub-Basin. There are no drains or streams within or immediately adjacent to the application site. The closest water feature to the site is a drain 62m from the eastern site boundary. This drain flows in a southerly direction until its confluence with the Rockcorry Stream, which is 72m south of the application site. The Rockcorry Stream flows in a westerly/south-westerly direction, through Drumgole Lough and Drumhay Lough until its confluence with the Dromore River, just north of Cootehill.

The EPA have defined the ecological status of the Rockcorry Stream and its tributaries as poor for its entire length. Under the requirements of the Water Framework Directive in Ireland, this is unsatisfactory and good status must be achieved by 2021.

The existing discharge point(s) 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 Drumgole GWS. The water is test regularly by the operators of the scheme and the local authority. This office is not aware of any existing issues with this GWS. There is presently no bored well on site however the applicant proposes to bore a well as a backup supply and to perhaps supply water to the proposed poultry houses.

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 significant 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 significant 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 significant proposed increase in production and particularly during the construction phase.

Pest Control:

Pest control measures currently are carried out by the applicant in line with Bord Bia requirements. It is proposed that this arrangement will continue for the new facilities. 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 does not 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 all houses as is currently the case. 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 suitably locked and bunded storage area. Chemicals pertaining to the proposed units will be stored in the same location.

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