



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE EHS
Submission Title:	P1089 01
Submission Reference No.:	S004762
Submission Received:	20 November 2018

Application

Applicant:	Mr. Paddy Kelly
Reg. No.:	P1089-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Cavan and Monaghan
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Ref. BC/COD

05 November 2018

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.

Class and Nature of Activity: 6.1

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

**Applicant: Mr. Paddy Kelly, Aughrim Beg, Inniskeen (Culloville),
Castleblaney, Co. Monaghan.**

**Location of Facility: Aughrim Beg, Inniskeen (Culloville), Castleblaney, Co.
Monaghan.**

Ref. No: P1089 - 01

EHIS Ref: 0836

Dear Claire,

I refer to an application for an IPPC licence for a poultry production facility belonging to the above named applicant. The IPPCL application for this facility was submitted to the EPA on the 13 September 2018. There is currently 1 fully operational poultry house to accommodate 39,000 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 100,000 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 the applicant Mr. Paddy Kelly on the 25 October 2018.

Site Location:

The site in question is located in a rural area within the townland of Aughrim Beg, and it is accessed via a local road, linking to the Local Regional road the R179. It is 4.5km north-west of Inniskeen and 8.3km north-east of Carrickmacross, at National Grid Reference E289710 N309981. The site comprises an overall area of c. 1.191 hectares owned by the applicant with a total of c. 44.83 hectares farmed, including the site of the proposed development. The development for which a licence is sought is located on the existing farm alongside the existing poultry house and close to the applicant's home. The nearest non-family neighbours are located within approximately 150m of the site. It was established that the applicants existing farm and the nearest neighbours 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 to date regarding the existing poultry house and this office has not been made aware of any complaints.

Manure:

Currently all manure is collected by the contractor CLR Co-op Ltd T/A Poultry Manure Supplies (PMS) Mount Louise, Smithboro, 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 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 house is being cleaned. The applicant also stated that if necessary he has facilities for manure storage at his farm at another location.

Soiled Water:

Currently, soiled water from the existing poultry house is diverted to a soiled water tank on-site via a piped drainage system to the front of the existing poultry house. Although the proposed wash water tank is identified in the site layout in Appendix 2 the existing wash water tank is not. The applicant stated that the proposed poultry house will have a separate soiled wash 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 stated that when the existing wash water tank is reaching its capacity the tank is 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, where it cannot be spread, is mixed in the cattle slurry tank. The applicant proposes to apply the same method of disposal of soiled wash water from the proposed 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 wash water tank.

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.

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 to 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. The applicant currently operates a diversion system whereby the same piped drainage system is used to divert clean surface water from the concrete yard to a field drain during normal operations and soiled water to the wash tank during the loading and cleaning process.

It is recommended that the applicant is advised to take all due care to ensure that the diversion system, which he has installed, ensures that wash water is not discharged accidentally or otherwise 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 reasonably possible and in any event is cleaned up and any soiled surface water is diverted to the wash water tank before it enters the clean surface water discharge point to avoid any potential water pollution incidents.

The applicant stated that he does not 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 monitors ground nutrients on his lands via a Nutrient Management Plan (NMP). 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/Storm Water:

The application site lies within the Newry, Fane, Glyde and Dee Hydrometric Area and River Catchment and the Fane Sub-catchment and Sub-Basin. There is a drain along the southern site boundary, which is to the rear of the existing poultry house. The water from this drain eventually reaches the River Fane, which is 703m north-east of the application site. The River Fane flows through Inniskeen and it flows in a south-easterly direction until it flows into the Irish Sea near Blackrock, Co. Louth. The EPA have defined the Fane River as being of good ecological status for much of its course. Under the requirements of the Water Framework Directive, this is satisfactory and this status must be maintained. The surface/storm water drainage from the existing poultry house is piped to that land drain along the southern site boundary. The proposed poultry house will also be drained via a similar method and discharged to the same land drain.

The existing discharge point is not 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 and the proposed poultry house is and will be supplied with water from the Donaghmoyne GWS and from a deep bored well located on site and to the front of the existing poultry house. Although the well is identified in the site layout in Appendix 2 it is not mentioned as a source of water in section '4(3)(5) Effect on Water' of the EIS. The applicant stated that the water from both the GWS and the Well are test regularly in line with Bord Bia requirements. This office is not aware of any existing issues with the Donaghmoyne GWS.

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 College Proteins an authorised Animal-By-Products Facility at Nobber, Co. Meath 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 in light of the proposed increase in production and particularly during the construction phase, that the applicant be advised to continue to monitor noise from this installation and restrict construction times to not before 8am or after 6pm and none on Sundays and public holidays.

Pest Control:

Pest control measures are currently carried out by the applicant. 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 poultry house. Records of pest control measures were inspected and 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 store oil on the existing site nor does he intend to store oil on-site and that gas will be used to heat both houses. A back-up generator is used on-site which is powered by diesel however, the generator incorporates a self bunded system to avoid any accidental leakage of fuel to surface or ground water.

Chemical Storage

A very small amount of chemicals are stored in a designated locked storage area to the front of the existing poultry house which is suitable for the storage of chemicals. The applicant stated that he generally does not store chemicals on-site and that he purchases chemicals only when required for use.

It is recommended that the applicant be advised to continue 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 Environmental Health Service have no further concerns at this time regarding this facility.

Yours faithfully,

Barry Coady
Environmental Health Officer

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Ref: BC/COD

05 November 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.

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Monaghan.**

Ref. No: P1089 - 01

EHIS Ref: 0836

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 09 October 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 25 October 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