



### Submission

Submitter:	Ms. Sharon Donnelly
Organisation Name:	HSE
Submission Title:	Rec'd by Email
Submission Reference No.:	S004846
Submission Received:	28 November 2018

### Application

Applicant:	Mr. Pat Rooney
Reg. No.:	P1091-01

See below for Submission details.

Attachments are displayed on the following page(s).

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## Patrick Doyle

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**Subject:** FW: HSE report for industrial Emissions Licence P1091-01 - Pat Rooney, Jordanstown, Oldtown, Co. Dublin

**Attachments:** EH Cover Letter Pat Rooney Nov 18.pdf; EH report Pat Rooney licence Nov 18.pdf; Dept Public Health comments IEL Application P1091-01 23 11 2018.pdf

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**From:** SHARON COLLINS

**Sent:** 28 November 2018 17:28

**To:** Licensing Staff <[licensing@epa.ie](mailto:licensing@epa.ie)>

**Cc:** NOEL DONNELLY; Andrew Sulley

**Subject:** HSE report for industrial Emissions Licence P1091-01 - Pat Rooney, Jordanstown, Oldtown, Co. Dublin

To Whom It May Concern,

Please find responses in relation to the above application number from Environmental Health and Health Protection Departments of the HSE.

Kind regards,

**Sharon Donnelly | Environmental Health Officer**

1st Floor Unit 4 & 5 The Nexus Building | Blanchardstown Corporate Park | Dublin 15  
t +353.1.8976163

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When we go through tough time, little things like talking about our problems, getting regular exercise, drinking less alcohol and being involved in activities we enjoy can make a big difference to how we feel. Find the little things that work for you at [yourmentalhealth.ie](http://yourmentalhealth.ie)

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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhíse ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig [service.desk@hse.ie](mailto:service.desk@hse.ie) agus ansin glan an ríomhphost seo ded' chóras."

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health  
Health Service Executive  
First Floor, Unit 4 & 5  
Nexus Building  
Blanchardstown Corporate Park  
Dublin 15

Tel: (01) 897 6140  
Fax: (01) 897 6196

Ref: SD/ND

27<sup>th</sup> November 2018

Environmental Licensing Programme  
Office of Climate, Licensing & Resource Use  
Environmental Protection Agency  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford.

**Re: Application for Industrial Emissions Licence**

**Class & Nature of Activity: Class 6.1(a) Intensive Agriculture**

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

**Applicant & Location of Facility**

Mr. Pat Rooney, Jordanstown, Oldtown, Co. Dublin A00 AA00

**EHIS Ref: 0848**

**EPA Ref: P1091-01**

To Who 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 31<sup>st</sup> October 2018.

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- CHO

A response was received from Health Protection which you will find attached.


The Environmental Health Service response to the consultation request is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- 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 me at the above address.

  
Noel Donnelly  
Principal Environmental Health Officer

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

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Mr. Noel Donnelly  
Principal Environmental Health Officer  
Environmental Health Service  
1st Floor Unit 4&5 The Nexus Building  
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Ballycoolin  
Dublin 15

27<sup>th</sup> November 2018

**Re: Application for Industrial Emissions Licence**

**Class & Nature of Activity: Class 6.1(a) Intensive Agriculture**

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

**Applicant & Location of Facility**

Mr. Pat Rooney, Jordanstown & Wolganstown, Oldtown, Co. Dublin A00 AA00

**EHIS Ref: 0848**

**EPA Ref: P1091-01**

Dear Mr. Donnelly,

I refer to an application for an industrial emissions licence for four proposed poultry houses from the above named applicant. The application for these units was submitted to the EPA on the 26<sup>th</sup> October 2018.

The applicant is proposing to construct four poultry houses on what is currently a greenfield site located on the applicants existing farm at at Jordanstown & Wolganstown, Oldtown, Co. Dublin. The four houses will have the total capacity to accommodate approximately 200,000 broilers on-site.

The following are observations made whilst reviewing the application and associated documents.



## **Site Location & Proposed Development**

The site of the proposed development and existing farm is owned by the applicant. The existing farm, and the site of the proposed development, is adjoining a local primary road, on c. 5.878 Ha, located opposite the applicant's dwelling and farmyard complex, in the town land of Jordanstown & Wolganstown.

The surrounding landscape is typically rural in character, dominated by a patchwork of agricultural fields interspersed with one off dwellings or groupings of same and agricultural buildings.

The applicant also proposes to construct a roofed/enclosed service yard, an office, a generator store, a in/general purpose store along with all ancillary structures (to include gas storage tanks, soiled water tanks, meal storage bins.) and associated works (to include upgrading the existing agricultural site entrance and internal laneway). The will operate and manage the proposed development.

There has been no history of any incidents or complaints associated with this farm from neighbours or otherwise.

### **Manure**

It is proposed that all manure from the proposed development will be removed off site for use on the lands farmed by the applicant as an organic fertiliser. In addition, where required it is proposed that the manure will be collected by an approved and registered contractor for use in mushroom compost production, and/or by other customer farmers for use as an organic fertiliser.

### **Soiled Water**

Soiled water will be directed into soiled water storage tanks pending its application to the landholding adjoining/adjacent to the site. The storage tanks will provide approximately 7.5 months capacity. All proposed soiled water storage facilities will be constructed and monitored in line with E.P.A., Fingal Co. Co. and Department of Agriculture requirements. The soiled water tank will have a high level alarm which will be continuously monitored.

### **Surface/Storm Water**

Surface water and storm water will be generated from roofs and the hard standing areas on site. They will discharge to a swale drainage system. Any excess from same will discharge to the local water course, a tributary of the Clonmethan Stream/Ballyboghill

River which enters Rogerstown Estuary SPA/SAC. The proposed swale system will be designed to ensure that the proposed discharge from the site is equivalent to existing greenfield runoff rates.

It is recommended that the applicant put in place a surface water quality monitoring scheme, to include storm water discharge points, with periodic monitoring of relevant parameters.

### **Odour**

The closest third party dwelling to the proposed site, is located 575m West-North West of the proposed development. As the prevailing wind is westerly-south westerly, it is envisaged that any potential odours from this proposed farm will be blown away from this residence.

It is recommended that the applicant be advised to continually monitor odour from the installation.

### **Noise and Dust**

There are no noise sensitive locations within 580m of the proposed development other than those owned by the applicant.

It is recommended that the applicant be advised in relation to the standard noise emission limit values of 55 (daytime) and 45 (night time) dB(A) in relation to the new development and to continually monitor noise and dust from this installation particularly during the construction phase.

### **Pest Control**

A pest control programme, to take account of the proposed development, will be implemented on the farm.

### **Waste**

It is proposed that all wastes generated on site, such as dead birds, general packaging will be stored temporarily on-site. All wastes will be removed from the site by authorised waste contractors. There will be no disposal or recovery of any waste undertaken on the site.

It is recommended, given the capacity, that adequate and suitable storage facilities are provided by the applicant for the storage of dead bird carcasses on site and that they

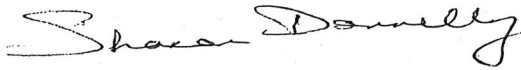


are collected by the contractors as often as necessary and before the storage containers overflow.

**Conclusion**

Other than the issues stated above, the Environmental Health Service have no further concerns at this time regarding this facility.

Yours sincerely,



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**Sharon Donnelly**  
**Environmental Health Officer**

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## **Department of Public Health East response to Environmental Impact Assessment consultation for: Industrial Emissions Licence Application P1091-01 at Jordanstown, Oldtown, Co Dublin**

**Prepared by:** Dr Ruth McDermott, SpR Public Health Medicine

**Issue:** Consultation received by HSE on 26/10/2018 from EPA.

**Brief outline of proposal/ application:** The applicant Mr. Pat Rooney, has applied to the EPA for an Industrial Emissions License in relation to the rearing of poultry in installations where the capacity exceeds 40,000 places at Jordanstown, Oldtown, Dublin. Under the EPA Act 1992 this comes under the sector of intensive agriculture, class 6.1(a).

**Status of application:** Industrial Emissions Licence Application for consideration – routine notification, submissions via Noel Donnelly PEHO by 23/11/2018.

- EPA Reference Number is P1091-01
- EHIS Reference Number is 0848

### **Geographical area & Population profile**

From the information provided the site appears to be in a rural area.

The Primary care team catchment area of Oldtown has a slightly higher than average proportion of persons in the age groups: 10-19; 45-59 and 85 and over. It has slightly higher than average proportion in the more affluent and slightly less than average in the less affluent groups as defined using the HP index. In the area 5% of people are carers compared with 4% nationally.<sup>1</sup>

### **Vulnerable populations**

There is a primary school in Oldtown approximately 1.5km from the facility.<sup>2</sup> There do not appear to be any crèches in the vicinity.<sup>3</sup> There do not appear to be any nursing homes in the vicinity.

### **Potential health impacts**

Odour nuisance from such facilities is a major issue for local residents. Any planning would need to address the likelihood of odours adversely impacting on the quality of life of local residents taking into account prevailing winds etc. The odour produced from concentrated animal feeding operations is the result of a complex mixture of gases. Residents living near such facilities have been shown to have altered immunoglobulin responses associated with odour and one study suggested an increase in self-reported wheezing and changes in lung function in persons living within 500m of these facilities.<sup>i</sup>

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<sup>1</sup> [www.finder.healthatlasireland.ie](http://www.finder.healthatlasireland.ie)

<sup>2</sup> <https://www.education.ie/en/find-a-school>

<sup>3</sup> <https://www.childcare.ie/>

Of particular concern in relation to waste material and effluent from a poultry farm is the issue of the high prevalence of anti-microbial resistant organisms in poultry, the excessive use of antibiotics in this industry and concern about the fate of both the resistant organisms and the antibiotics in waste matter/effluent from such facilities. The emergence of antimicrobial resistant organisms is recognised as a major threat to public health. The presence of such organisms in water has been shown and is the subject of ongoing research by the StARE and AREST research teams. Prevention of contamination of water with such resistant organisms is crucial in delivery of One Health approach.

Resistant bacteria can enter the environment via waste disposal on land with minimal treatment; runoff into ground and surface water; airborne caused by high-volume fans (with resistant organisms found 30m downwind of facilities); soil; food crops and environmental transfers by animal contact including flies, rodents and wild birds.<sup>ii</sup>

Brief review of documentation provided in relation to waste suggests that “mixed waste” will be produced by the plant and will be disposed of in off-site landfill. This plan does not seem adequate to address concerns about release of resistant organisms into the environment from such waste.

The risk of flooding affecting the facility and resulting in inadvertent contamination of water sources in the area needs to be assessed with due consideration of likely increase in extreme weather events in the immediate future.

Other potential health effects need to be considered including increased heavy goods vehicles accessing the facility and pertinent road safety issues on such rural roads; increase in vermin, flies etc attracted to the facility; any potential noise nuisance from the facility.

### **Health benefits**

It is noted that this facility will provide some local employment.

### **Summary**

The potential for release of antimicrobial resistant organisms and antibiotic chemicals from this facility are a serious concern for public health.

### **Recommendations**

We request that planning application on this facility address how these serious health risks will be prevented for the protection of public health, not limited to persons living close to the plant.

The local community should be consulted in relation to this application.

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<sup>i</sup> Heederik D, Sigsgaard T, Thorne PS, et al. Health effects of airborne exposures from concentrated animal feeding operations. Environ Health Perspect. 2006;115(2):298-302.

<sup>ii</sup> Ellen K. Silbergeld, Jay Graham, Lance B. Price. Industrial Food Animal Production, Antimicrobial Resistance, and Human Health. Annual Review of Public Health 2008 29:1, 151-169