



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE EHS
Submission Title:	P0998-02
Submission Reference No.:	S005317
Submission Received:	15 February 2019

Application

Applicant:	Mr. Gerard McGuinness
Reg. No.:	P0998-02

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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13 February 2019

Ms. Claire O'Dwyer
A/Principal Environmental Health Officer
Environmental Health Office
The Arcade
Main Street
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Re/ Application for an Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: Class 6.1

The rearing of poultry in installations weather within the same complex or within 100 metres of the same complex, where the capacity exceeds 40,000 places.

Applicant: Mr. Gerard McGuinness, Ballagh, Threemilehouse, Co. Monaghan.

Location of facility: Ballagh, Threemilehouse, Co. Monaghan.

Ref. No/ P0998- 02

EHIS Ref: 0891

Dear Claire,

I refer to a review of an existing IPPC licence for poultry production units belonging to the above named applicant. The IPPCL review application for these units was submitted to the EPA on the 11 January 2019. There are currently 3 fully operational poultry houses to accommodate 69,000 broilers on-site. The applicant is proposing to construct No.2 additional poultry houses. The proposed units will increase capacity to 175,000 broilers.

The following are observations made whilst reviewing the said application and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit and discussions with Mr. Gerard McGuinness on 06 February 2019.

Site Location:

The site in question is located in a rural area within the town-land of Ballagh & Greagh. Access to the site is via an existing service road that is just off a local road. The area of the site is 1.18 hectares. It is 2.8km south of Three Mile House and 5.8km south-east of Smithborough at National Grid Reference E263932 N327717. The site comprises an overall area of c. 1.363 hectares with a total of c. 25 hectares currently farmed by the applicant. The site and adjoining lands is currently farmed by the applicant's brother.

The existing site, while remotely located is serviced by a good road network, accessed by a local road which subsequently connects with the Regional Route (R188) c. 2.25 km's from the farm entrance. The nearest non-family neighbour is located approximately 100 - 150m from the site and not 300m as stated in the EIS. 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 or objections to the proposal and this office has not been made aware of any complaints or objections.

Water Supply:

There are no bored wells on site. The applicant advised that the existing poultry houses and the proposed poultry houses are and will be supplied with water from Stranoodan GWS as a source of water for stock and washing. He further advised that the water supply is tested regularly by the Group Water Scheme operators and in line with Bord Bia requirements. This office is not aware of any issues concerning this water supply.

Wash Water:

Soiled water is collected and stored from the three poultry houses in soiled water tanks located at the end of each poultry house. The applicant stated that when the tanks are reaching their capacity the tanks are emptied the tanks and spread on the applicants surround lands or emptied into the cattle slurry tank and it is then subsequently spread on the family land surrounding the site at the appropriate time of the year. Wash water from the proposed units will be collected and stored in the same manner in No.2 dedicated and newly constructed wash water tanks located at the end of each of the two proposed houses. The applicant stated that the said tanks will have at least 6 months storage capacity as required.

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.

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.

At the time of the visited it was noted that all of the existing wash water tanks had reached there capacity. If an unintentional overflow was to occur it has the potential to cause significant pollution issues to the water course directly in front of the three houses and wash water tanks. The gradient in the concrete aprons is sloped towards the water course and therefore any soiled water which may escape from the wash water tanks would naturally make its way to the water course. None of the wash water tanks were fitted with high level meters. This matter was highlighted in our previous report dated 08 September 2014.

It is recommended that the applicant install High Level Monitors to the existing and proposed wash water tanks in order to minimise the risk of unintentional overflow. It is further recommended that the applicant monitor and empty the wash water tanks before they reach their capacity again to avoid any unintentional overflow.

The applicant indicated that he may 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 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.

Storm/Surface Water:

The application site lies within the Erne Catchment, the Finn (Monaghan) Sub-catchment and the Magherarney Sub-Basin. There are a number of watercourses adjacent to the application site, including two separate streams that flow along the northern site boundary and the southern site boundary. These streams flow from two separate lakes that are close to the application site, i.e., Corcaghan Lough and Greagh Lough, which are 842m and 782m south of the application site respectively. These streams converge beyond the application site and then flow in a north-westerly direction until their confluence with the Thornhill Stream, approximately 4km downstream of the application site. The EPA have classified the ecological status of the streams that are close to the application site as poor. Under the requirements of Water Framework Directive, this is unsatisfactory and this status must be improved to good status by 2021. Storm water and surface water is drained by natural means from the roof and associated concrete yard from the poultry houses via a combination of a piped drainage system and a natural gradient in the concrete yard and discharged to a water course directly in front of the three houses and wash water tanks. The discharge point is not labeled on-site. The applicant stated that the site has never flooded and that there is no risk of future flooding

The means in which the storm water and surface water is drained from the roof and associated concrete yards exposes the potential for surface water to become contaminated particularly during loading and cleaning process. Given that the ecological status of the streams that are close to the application site are poor, it is important that the applicant take all due care in ensuring that the existing site and the proposed site do not impact further on the water quality.

The applicant stated that there is currently no Surface Water Quality Monitoring Scheme in place on this site.

It is recommended that the applicant is advised to take all due care to ensure that soiled water does not contaminate the clean surface water particularly when loading or cleaning is in progress.

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.

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.

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.

Manure:

Currently all manure is collected by a licensed contractor namely George Coulson & Sons Ltd, Tircooney, Clones, Co. Monaghan, who removes the manure from the existing houses for the purpose of composting. The applicant stated that no manure will be stored on site. If however in the event manure needs to be stored on-site there are currently suitable facilities on another site to accommodate manure storage. The current arrangement is expected to continue for the proposed units

Waste:

As per licence there is 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 Ltd, as stated in the EIS. It was also confirmed by the applicant that the same contractor will be employed to remove dead birds associated with the proposed development.

It is recommended that the applicant ensure that there is adequate storage for dead birds given the increase and 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.

Oil Storage:

Currently the site uses gas to heat the houses and the proposed houses. However, the oil storage tank for the back-up generator is not bunded. The oil tank is located in an area which has the potential to cause substantial pollution to ground water courses and contaminate land if a leak should occur.

It is recommended therefore that the applicant is advised that in accordance with Batneec Guidance oil storage tanks on site should be placed on impervious bases and shall be located within oil tight bunds, capable of holding 110% of the volume of the largest tank within the bund. The fill and draw pipes shall be enclosed within the bund.

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 particularly during the construction phase.

Pest Control:

Pest control measures are carried out by the applicant. 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 but not stored on-site for inspection.

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 and stored on site as per licence.

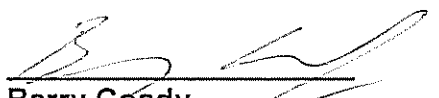
Chemical Storage:

A very small amount of chemicals are stored in a designated locked bunded 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 large quantities of chemicals on-site and that he purchases chemicals only when required for use.

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



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Ref/ BC/CO'D

13 February 2019

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

Re/ Application for an Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: Class 6.1

The rearing of poultry in installations weather within the same complex or within 100 metres of the same complex, where the capacity exceeds 40,000 places.

Applicant: Mr. Gerard McGuinness, Ballagh, Threemilehouse, Co. Monaghan.

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Ref. No/ P0998- 02

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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 25 January 2019:

- 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 in this case a screening report.
- A site visit was conducted on 06 February 2019.
- 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