



Submission

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| Submitter: | Miss Claire O'Dwyer |
| Organisation Name: | HSE EHS |
| Submission Title: | P1098 |
| Submission Reference No.: | S005320 |
| Submission Received: | 20 February 2019 |

Application

| | |
|------------|---------------------|
| Applicant: | Tru Poultry Limited |
| Reg. No.: | P1098-01 |

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
The Arcade
Main Street
Cavan
Co. Cavan

Tel: 049 4373418
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Ref: BC/COD

20 February 2019

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 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: Tru Poultry Ltd, 6 Market House Lane, Emyvale, Co. Monaghan.

Location of facility: Crossnacaldoo, Tydavnet, Co. Monaghan.

Ref. No/ P1098- 01

EHIS Ref: 0888

Dear Claire,

I refer to an application for an IPPC licence for No. 2 proposed poultry houses from the above named applicant. The IPPCL application for these units was submitted to the EPA on the 11 January 2019. The applicant is proposing to construct No. 2 poultry houses on what is currently a green-field site located on the applicants existing farm at Crossnacaldoo, Tydavnet, Co. Monaghan. The proposed two houses will have the capacity to accommodate approximately 110,000 broilers on-site when completed.

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 the site visit and discussions with Mr. Kieran McKenna, the applicant, on the 13 February 2019.

Site Location

The site in question is located in a rural area within the townland of Crossnacalduo. The site is 2.392 hectares in area and it is accessed directly off the adjoining regional road. It is c. 6km west of Emyvale and c. 6 km northwest of Tydavnet, at National Grid Reference E261339 N344629. The site comprises an overall area of c. 2.392 hectares owned by the applicant with a total of c. 17hectares farmed at this location. The existing site, while remotely located is serviced by a good road network, accessed by a regional road which subsequently connects with the National Route N2 Monaghan - Derry Road, c. 6 km east of the site. This proposed site is to be accessed via a new entrance. The applicant stated that he has substantial experience in farming in general having been involved in farming all of his life including the rearing of poultry. Following assessment of the site it was determined that the nearest non-family neighbour is approximately 100m or more from the proposed site. The applicant stated however that there has been no objection or complaints to the proposed development from any of the neighbours and that the nearest neighbour has endorsed the development. This office has not been made aware of any complaints.

Water Supply

The applicant advised that the proposed houses will be supplied with drinking water and water used for cleaning from the Truagh Group Water Scheme (GWS) which is monitored by the local authority. He advised that the water supply is tested regularly by the Group Water Scheme operators. He further advised that the applicant may decide to drill a deep bored well on site in the future as a back-up water supply. This office is not aware of any existing issues with any Group Water Scheme in that locality.

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.

It is recommended that if the applicant decides to develop a bored well for use at the facility 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.

Manure:

It is proposed that all manure will be collected by a licensed contractor namely CLR Co-op T/A Poultry Manure Supplies (PMS) Mount Louise, Smithboro, Co. Monaghan, who will remove the manure from the 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 his other farm to accommodate manure storage.

Wash Water

Wash water from the proposed units will be collected and stored 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. The wash water will be subsequently spread on the applicants surrounding lands. In the event the applicant is unable to spread the wash water on his surrounding lands, during the months in which he is permitted to do so due to for example weather conditions, the applicant has adequate facilities on site i.e. slated shed units, for the storage of wash water.

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.

It is recommended that a 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 install High Level Monitors to the proposed wash water tanks in order to minimize the risk of unintentional overflow.

Storm Water / Surface Water

The application site lies within the Lough Neagh and Lower Bann Hydrometric Area and the Mountain Water Sub-catchment and Sub-Basin. The applicant advised that clean surface water from the site will be directed to drains that are adjacent to the site and this water will then flow towards the Mountain Water River, which is 63m north of the northern site boundary. The EPA have classified the ecological status of the Mountain Water River and its tributaries that are close to the application site as being of high ecological status.

Under the requirements of the Water Framework Directive, this is satisfactory and it is vital that this status is maintained. Storm water from roofs and clean yards will discharge to field drainage via a storm water collection system.

The applicant further advised that the storm water discharge points will be regularly checked, inspected and monitored. There will be no discharge of any soiled water or any effluent from the site to any watercourse or to groundwater. Due to the ecological status of the surrounding water courses it is vital that the applicant take all due care in ensuring that there is no discharge of contaminated waters from the proposed development.

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.

The applicant stated that the site has never flooded and that there is no risk of future flooding.

Waste

The applicant stated that College Proteins will be the contractor employed to remove dead birds off-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. That the applicant is advised that the carcasses should be removed by a registered contractor, in this case College Proteins, 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

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

Noise and Dust

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.

It is recommended that the applicant be advised to continually monitor noise and dust from this installation particularly during the construction phase.

Pest Control

The applicant intends to apply pest control measures to the facility himself.

It is recommended that the applicant is advised of his obligations in terms of vermin control.

It is further recommended that the applicant is advised to apply adequate pest control measures to the proposed poultry houses and that the bait boxes are monitored regularly to ensure an adequate amount of bait is present in the boxes. That pest control records and measures be maintained by the applicant on site in line with the Bord Bia bait programme.

Oil Storage

The applicant stated that he does not intend to store oil on-site of the proposed poultry units and that gas will be used to heat the houses. The applicant advised that a back-up generator will be used on-site which will be powered by diesel. This particular generator does not incorporate a self bunded system to avoid any accidental leakage of fuel to surface or ground water.

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.

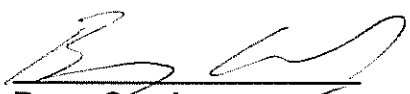
Chemical Storage

It is recommended that the applicant be advised to store all chemicals safely in a bunded area.

Conclusion:

Other than the issues 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/CO'D

20 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 Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity/ Class 6.1

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Ref. No/ P1098- 01

EHIS Ref: 0888

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.

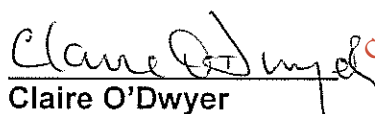
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 13 February 2019.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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

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