



Submission

Submitter:	Mr Andrew Sulley
Organisation Name:	Environmental Health
Submission Title:	P1107-01 EHS submission
Submission Reference No.:	S005462
Submission Received:	10 April 2019

Application

Applicant:	Christopher McMahon
Reg. No.:	P1107-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Ref/ BC/CO'D

10 April 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. Christopher McMahon, Tattindonagh, Ballinode, Co. Monaghan.

Location of facility: Tattindonagh, Ballinode, Co. Monaghan.

Ref. No/ P1107- 01

EHIS Ref: 0916

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 08 March 2019:

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

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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 03 April 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	Soil
Water	Air
Climatic Factors	Material Assets
Interaction of the above	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
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EHIS Ref: 0916

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 06 March 2019. Of the two poultry houses the applicant has already constructed and stocked one of the houses located on the applicants existing farm at Tattindonagh, Ballinode, Co. Monaghan. The proposed two houses will have the capacity to accommodate approximately 110,000 broilers on-site.

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. Christopher McMahon, the applicant, on 03 April 2019.

Site Location:

The proposed development site is located in a rural area in the town land of Tattindonagh Td., Ballinode Co. Monaghan. The proposed development will be constructed at ITM [Irish Transverse Mercator] Eastings – 662146, Northings – 833774. The proposed development will be located c. 5.65 km West of the county town of Monaghan and 3.4km South East of the town of Scotstown.

The site comprises of an overall area of c. 1.48 hectares with a with a substantial land holding surrounding the site which is currently farmed by the applicant. The existing site, while remotely located is serviced by a good road network, accessed by a local road which subsequently connects to the site entrance. The nearest non-family neighbour is located approximately 100 - 150m from the site. 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 is one bored wells on site which is the main and only source of water to the site. The applicant advised that the existing poultry houses and the current and proposed poultry houses are and will be supplied with water from the well as a source of water for stock and washing. The applicant is however considering linking up with the Tydavnet/Augnashalvey GWS in the future as a back-up supply. He further advised that the water supply from the well is tested in line with Bord Bia requirements and that the water results to date have been satisfactory.

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. That the well remains fully protected from any risk of contamination.

Wash Water:

Soiled water is collected and stored from the existing poultry house in soiled water tank located at the front end of the poultry house. The applicant stated that when the tank reaches its capacity the tank is emptied and the wash water spread on the applicants surround lands or emptied into the cattle slurry tank. When constructed the wash water from the second poultry house will be collected and stored in the same manner in a second dedicated and newly constructed wash water tank again located to the front end of the house. 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 further recommended that the applicant is advised of Batneec Guidance Note Section 4.6 Spreading of Poultry Manure and the conditions therein.

The existing wash water tank was not fitted with a high level monitor.

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.

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.

Storm/Surface Water:

The EIS or the associated documents do not give any information on the ecological status of the surrounding water courses.

The applicant advised that storm water from roofs and clean surface water 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. That there will be no discharge of any soiled water or any effluent from the site to any watercourse or to groundwater. Regardless of 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 particularly during loading and cleaning. The current discharge point was not identifiable on 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.

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

Manure:

It is proposed that all manure will be collected by a licensed contractor namely Mc Cartney Contractors, 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.

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 is recommended that the applicant ensure that there is adequate storage for dead birds particularly when the second house is constructed 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 or removed by a licensed waste collector and that there is no accumulation of waste on site.

Oil Storage:

Currently the site uses gas to heat the existing house. There is a back-up generator on site which uses diesel the generator however, according to the applicant, has a built in 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.

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 currently by the applicant. The applicant advised the he intends to employ a contractor to do the work namely Pest Proof Ltd, Analore, Clones, Co. Monaghan. A visual inspection of the bait boxes was carried out. The boxes were well baited and located at regular intervals around the house. Records of pest control measures are being maintained by the applicant.

It is recommended that the applicant ensures the same pest control measures are applied to future developments 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.

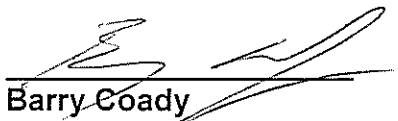
Chemical Storage:

No chemicals are currently stored on-site however the applicant intends to construct a designated locked bunded storage area on-site for the storage of chemicals. The applicant stated that he generally does not store 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

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