



### Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE EHS
Submission Title:	P0843-02
Submission Reference No.:	S005576
Submission Received:	21 June 2019

### Application

Applicant:	Mr Sean McKenna
Reg. No.:	P0843-02

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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21 June 2019

Ms. Claire O'Dwyer  
Principal Environmental Health Officer  
Environmental Health Office  
The Arcade  
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Co Cavan

**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. Sean McKenna, Derrykinnigh Beg, Emyvale, Co. Monaghan.**

**Location of facility: Derrykinnigh Beg, Emyvale, Co. Monaghan.**

**Ref. No/ P0843 - 02**

**EHIS Ref: 0953**

Dear Claire,

I refer to an application for an IPPC licence for the proposed demolition of 1 No. existing poultry house and construction of 1 No. replacement poultry house, and, an extension to 1 No. existing poultry house (for Broiler rearing), together with all ancillary structures and associated site works, on an existing poultry farm located at Derrykinnigh Beg, Emyvale, Co. Monaghan. The farm currently operates under Licence No. P0843-01 granted by the Environmental Protection Agency in 2008, which will be reviewed to accommodate the proposed developments and increased bird numbers submitted by the above named applicant. The existing farm, operated by the applicant, is located on the site of the proposed development and has been operated as a poultry farm for in excess of c. 25 - 30 years. It consists of 3 No. Broiler rearing houses currently operating at c. 98,000 birds, together with all ancillary structures and facilities necessary for the operation of this enterprise. The existing and proposed poultry farming activities are the only agricultural activities carried out on this site by the applicant, with bovine farming activities carried out by the applicant's son on the adjoining lands.

The proposed developments will increase capacity to accommodate approximately 131,500 broilers on-site. The IPPCL application for this development was submitted to the EPA on the 07 June 2019.

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. Sean McKenna, the applicant, on 14 June 2019.

#### **Site Location:**

The site is in a rural agricultural area c. 5.5 km North West of Tydavnet, and 5.5 km's west of Emyvale. The activity on the farm is, and will be, a poultry farming activity. The site comprises an overall area of c. 1.06 hectares owned by the applicant with a total of c. 2.74 hectares within the landholding. The site is well serviced by the current road infrastructure and is accessed by a local primary road which subsequently connects with the Regional Road, the R186 Tydavnet, Monaghan Road at National Grid Reference E262011, N344026. The proposed developments will be completed on the existing structures and will use the existing access routes and site infrastructure. The poultry house/poultry house extension for which permission is sought would be located on the site of the existing poultry houses.

The nearest non-family neighbour is located approximately 100m 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 deep bored well on site which is the back-up supply of water to the site. The applicant advised that the existing poultry houses and proposed poultry houses are and will be supplied with water from the Trugh GWS and not the Tydavnet GWS as stated in the EIS. The applicant 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. The well is located in a pump house structure which protects the well.

**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 by ensuring the pump house door remains closed.**

#### **Wash Water:**

There are 3 No. existing soiled water tanks on the farm. These are located to the rear of each of the existing houses. Soiled water drainage from the proposed replacement house is to be directed to the existing slatted tank. The applicant stated that when the tanks reach their capacity the tanks are emptied and the wash water spread on the applicants surround lands or emptied into the cattle slurry tank. The applicant stated that the said tanks have at least 6 months storage capacity as required. The existing tanks have high level indicators installed.

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.

It is recommended that the applicant install High Level Monitors to the 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 application site lies within the Neagh-Bann River Basin District, the Lough Neagh and Lower Bann Hydrometric Area and the Lough Neagh and Lower Bann Catchment. The site is located c. 0.8 Km from the closest Natura 2000 site Slieve Beagh. The site is located within the Mountain Water sub-catchment. There are no streams or drains within or on the application site. The closest water body is a stream c. 100 m north of the existing developments. The EPA refer to this stream as the Mountain Water and this is a tributary of the Ulster Blackwater. The EPA have defined the ecological status of the mountain water river as high at its closest point to the application site. Water quality deteriorates to good status further downstream. Under the requirements of the Water Framework directive, this is satisfactory and this status must be maintained.

The applicant advised that storm water from roofs and clean surface water is and will discharge to field drainage via the existing storm water collection system which flows towards and is discharged to the adjacent watercourse (Mountain Water River a tributary of the Blackwater). The applicant further advised that currently the storm water discharge points are regularly checked, inspected and monitored. It is envisaged by the applicant that the same discharge points will be used for the proposed development. The collection point for clean surface water from the yards suggested that there may be some contamination entering the clean surface water collection system. Traces of what appeared to be manure was evident on the grated cover and the water in the clean surface water holding tank appeared very unclean and contaminated.

Considering 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 existing or proposed development particularly during loading and cleaning. The current discharge points were identified on site. The applicant currently has no storm/surface water quality monitoring system in place.

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.

**Manure:**

It is proposed that all manure will be collected by the existing licensed contractor namely CLR, 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-site 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 proposed development is active. 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 facility.



**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 continually monitor noise and dust from this installation particularly during the construction phase. That work on-site is limited to day time hours 06:00am – 20:00pm to avoid any noise nuisance.

**Pest Control:**

Pest control measures are carried out currently 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 house. Records of pest control measures are being maintained by the applicant on-site.

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:**

Small quantities of chemicals are currently stored on-site in a closed container which is not bunded. The applicant however intends to bund all chemical on-site. 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.

It is recommended that the licence contain a condition that all chemicals being stored on-site are stored in a bunded area.

**Conclusion:**

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

21 June 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. Sean McKenna, Derrykinnigh Beg, Emyvale, Co. Monaghan.

**Location of facility:** Derrykinnigh Beg, Emyvale, Co. Monaghan.

**Ref. No/ P0843 - 02**

**EHIS Ref: 0953**

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 11 June 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 14 June 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**