



### Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE EHS
Submission Title:	P1110-01
Submission Reference No.:	S005578
Submission Received:	21 June 2019

### Application

Applicant:	Carrickabawn Farms Limited
Reg. No.:	P1110-01

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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21 June 2019

Ms. Claire O'Dwyer  
Principal Environmental Health Officer  
Environmental Health Office  
The Arcade  
Main Street  
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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: Carrickabawn Farms Limited, Carrickabawn, Latton, Castleblaney, Co. Monaghan.**

**Location of facility: Greaghlane, Castleblaney, Co. Monaghan**

**Ref. No/ P1110-01**

**EHIS Ref: 0956**

Dear Claire,

I refer to an application for an IPPC licence for the proposed development to demolish 2 No. existing mushroom houses, construction of 1 No. poultry house, and an extension to 2 No. existing poultry houses together with all ancillary structures and associated site works, on the applicants existing poultry farm located at Greaghlane, Castleblaney, Co. Monaghan. 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 the past number of years. It consists of 2 No. pullet rearing houses currently operating at c. 38,000 – 40,000 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. The proposed developments will increase capacity to accommodate approximately 100,000 pullets 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. Thomas Sullivan, the applicant, on 19 June 2019.

#### **Site Location:**

The site in question is located in a rural area within the townland of Greaghlane. Access to the site is just off a local primary road the LP-4041-0. The area of the site is c. 1.35 hectares and it is 7.4km north-west of Carrickmacross and 7.1km north-east of Shercock at National Grid Reference E278944 N309156. The site is well serviced by the current road infrastructure and is accessed by a local primary road which subsequently connects with the Regional Route, the R180 Ballybay - Carrickmacross Road. The proposed developments will be completed adjacent to the existing structures and will use the existing access routes and site infrastructure. The poultry house developments for which permission is sought would be located to the rear of, and/or adjacent to the existing poultry houses, c. 100 m from the adjoining local road. There is one third party dwelling located within c. 100m of the proposed structures. Same belongs to the previous owner of the site and a letter of consent, as required by the Monaghan County Development Plan, has been submitted as part of this application. 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 located between existing house 1 and house 2. The applicant advised that the existing poultry houses and proposed poultry house are and will be supplied with water from the existing deep bored well and the Corduff Corragh GWS which is not mentioned in the EIS. The applicant further advised that the water supply from the well is tested by Whitakers, who purchase the birds from the applicant, and Bord Bia annually and that the water results to date have been satisfactory.

The location of the deep bored well may be vulnerable to ground water contamination due to its close proximity to house 1 and 2 where potentially significant quantities of storm water coming from the roofs of both houses may cause over saturation of the stoned ground surrounding the well. The applicant stated that he intends to develop, during the construction phase, the area around the well head to offer the well greater protection.

**It is recommended 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.

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:**

There are 2 No. existing soiled water tanks at the facility. These are located to the front of each of the existing houses. The applicant stated that it is intended to decommission the 2 existing wash water tanks and install one large tank to accommodate all 3 houses. 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 located on a separate farm owned by the applicant. The existing tanks have no high level indicators installed. At the time of the visit both wash water tanks were full to capacity.

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. This is particularly important given that any overflow has the potential to result in contaminated water entering the watercourse located along the road of the applicant's site.

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 *interalia* 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 Erne Hydrometric Area and Catchment, the Annalee Sub Catchment and the Knappagh Sub-Basin. There is a stream flowing along the northern (roadside) boundary of the application site. The EPA refers to this as the Tooa Stream. This flows in a north-westerly direction, through a series of small lakes, until its confluence with the Annalee River, at a point approximately 11km west of the application site. The EPA has defined the ecological status of the Tooa Stream and the other watercourses within this particular sub-basin as poor. Under the requirements of the Water Framework Directive in Ireland, this is unsatisfactory and good status must be achieved by 2021.

The applicant advised that he was unsure as to whether or not storm water from the roofs and clean surface water from the concrete yards are piped to a discharge point. The applicant stated that he intends to investigate this during the construction phase and in any event intends to put in place a piped drainage system for storm/surface water. The concrete aprons to the front of both houses are in very poor condition. The applicant advised that he intends to replace these aprons with new concrete aprons.

Two chambers were observed on site which appeared to be inspection chambers for surface water discharge. The applicant stated that he was unsure as to their purpose. The first chamber contained mud with no obvious inlet or outlet. The second chamber, nearest the road, contained what appeared to be a highly contaminated liquid with again no obvious inlet or outlet. It appears that both chambers are interlinked via pipe work and may be discharging contaminated water to a water course.

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. Due to the uncertainty by the applicant regarding discharge points, the applicant currently has no storm/surface water quality monitoring system in place.

It is recommended that the applicant identify the source of the mud and liquid and any associated pipe work in the existing inspection chambers to ensure that no contaminated liquids are being discharged to any water course.

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 as the development is on an elevated site.

#### **Manure:**

It is proposed that all manure will be collected by the existing licensed contractor namely Eamon Fitzpatrick, 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 in the event manure needs to be stored on-site there are currently no suitable facilities on-site to accommodate manure storage.

#### **Waste:**

There is adequate storage facilities provided for the storage of dead bird carcasses on site. The applicant stated that the carcasses are removed when necessary by Michael Galligan for transport to an authorised Animal By-products facility at Redhills, Co. Cavan.



It is recommended that the applicant ensure that there is adequate storage for dead birds particularly when the proposed development is fully 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 no diesel generator currently. The applicant stated that he owns a portable generator which he can bring on-site if required. The applicant stated the he intends to purchase a generator for the site.

It is recommended therefore that the applicant is advised that in accordance with Batneec Guidance oil storage tanks on site, which are not bunded or self bunded, 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 15-16 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 higher than normal for this type of farming activity. The odour appeared to be emanating from the soiled wash water tanks which were full to capacity.

It is recommended that the applicant be advised to empty the wash water tanks more regularly but any event before they reach capacity and to continue to monitor odour from the facility to identify at an early stage any odour nuisance which may be created.

#### **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 being created.

#### **Pest Control:**

Pest control measures are carried out by a contractor namely Verisure. A visual inspection of the bait boxes was carried out. The boxes were located at regular intervals around the house. Records of pest control measures are being maintained by the applicant on-site. From the applicants records it appeared that the site was last inspected by the contractor in February 2019.

It is recommended that the applicant ensures that pest control measures are applied to the future development and that the bait boxes are monitored more regularly by the contractor to ensure an adequate amount of bait is present in the boxes. That pest control records and measures continue to be maintained and stored on site.

**Chemical Storage:**

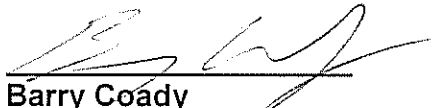
Small quantities of chemicals are currently stored on-site in a closed structure which is not bunded. The applicant however intends to bund all chemical on-site. The applicant stated that he generally does not store large quantities of chemicals on-site and that he purchases chemicals only when required 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

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Ref/ BC/CO'D

21 June 2019

Environmental Licensing Programme  
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Environmental Protection Agency  
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Co. Wexford

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

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**Ref. No/ P1110-01**

**EHIS Ref: 0956**

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 13 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.
- A site visit was conducted on 19 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