



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE EHS
Submission Title:	P0956-02
Submission Reference No.:	S005622
Submission Received:	25 July 2019

Application

Applicant:	Mr. John McCabe
Reg. No.:	P0956-02

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
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Ref: BC/COD

25 July 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 License Review.

Class and Nature of Activity: 6.1

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

Applicant: Mr. John McCabe, Brandrum, Monaghan, Co. Monaghan.

Location of Facility: Brandrum, Monaghan, Co. Monaghan.

Ref. No: P0956-02

EHIS Ref: 0971

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 02 July 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.

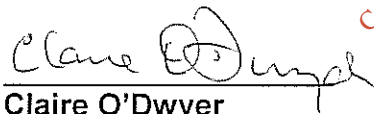
- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 22 July 2019.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional 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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Ms. Claire O'Dwyer
Principal Environmental Health Officer
Environmental Health Office
The Arcade
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Co. Cavan

Re: Application for Integrated Pollution Prevention and Control License Review.

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EHIS Ref: 0971

Dear Claire,

I refer to an application for a review of an IPPC licence for a poultry production facility belonging to the above named applicant. The IPPCL application for this facility was submitted to the EPA on the 28 June 2019. There is currently 2 fully operational poultry houses to accommodate 56 – 62,000 broilers onsite and operates under the EPA licence No. P0956-01. The applicant is proposing to construct No. 2 additional poultry houses which will increase capacity to 152,000 broilers on site.

The following are observations made whilst reviewing the said application, EIS and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during a site visit and discussions with the applicant Mr. John McCabe on the 22 July 2019.

Site Location:

The site in question is located in a rural area within the townland of Brandrum. Access to the site is via a private access road that is just off a local, road. The area of the site is 0.867 hectares. It is 3.7km south-west of Monaghan town and 4.8km north-east of Smithborough. The main habitat surrounding the site is improved agricultural grassland. Other habitats represented include mixed woodland, scattered trees, tree lines, hedgerows and water courses. The site is well serviced by the current road infrastructure and is accessed by a local road network which subsequently connects with the National Route, the N54 Clones - Monaghan Road. The development is located on the existing farm alongside the existing poultry houses. The nearest non-family neighbour is located approximately 300m from the site. The proposed development will be located c. 5.47 km South of the county town of Monaghan and 8.84 km South North of the town of Ballybay at Irish Grid Reference (IGR) Eastings – 266947, Northings – 328006. The site is accessed off local road L56011 which connects to regional road R188 between Monaghan Town & Cootehill Town 936m to the north east of the proposed development. It was established that the applicants existing poultry house and the nearest neighbours 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 to date regarding the existing poultry houses and this office has not been made aware of any complaints

Manure:

Currently all manure is collected by the contractor McCartney Contractors, Moynalty, Kells, Co. Meath, who removes the manure from the existing house and delivers it to mushroom composting facilities or crop growers. It is intended that this arrangement will continue when the proposed new houses are in operation. There is an existing manure store on-site however the applicant has stated that to-date there has been no reason to store manure as the contractor has always removed the manure as the houses are being cleaned.

Soiled Water:

Currently, soiled water from the existing poultry houses flows directly into two soiled water tanks located at the front entrance door of each of the existing poultry 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 applicant's cattle slurry tank located on-site. The applicant stated that the said tanks 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.

The applicant stated that when the existing wash water tanks reach capacity the tanks are emptied and subsequently spread on the family land surrounding the site at the appropriate time of the year and in accordance with the Nitrate directive. The applicant proposes to apply the same method of disposal of soiled wash water from the proposed tanks.

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.

There is currently only one of the existing wash water tanks with a high level indicator installed. If unintentional overflow was to occur it would potential have significant consequences for the surrounding water courses.

It is recommended that the applicant install high level monitors on the existing and proposed wash water tanks to minimise the risk of 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.

Surface/Storm Water:

The application site lies within the Lough Neagh and Lower Bann Hydrometric Area and Catchment, the Blackwater (Monaghan) Sub-Catchment and the Conawary Sub-Basin. Clean surface water from the application site is currently directed to local watercourses. The closest mapped watercourse to the application site is a stream 130m south of the southern site boundary. The EPA refer to this stream as the Ballyleck Stream, and it flows in a westerly direction, then a northerly direction until its confluence with the Conawary Stream (503m north of the application site). The Conawary Stream has its confluence with the River Blackwater approximately 2km north-west of Monaghan town.

The EPA has classified the ecological status of the Conawary Stream and its tributaries as poor. Under the requirements of the Water Framework Directive, this is unsatisfactory and good status must be achieved in these waters by 2021. Clean surface water from the concrete aprons located to the front of each of the existing poultry houses flows via a natural fall in the concrete yards and discharged to a field drain located at the end of one of the concrete aprons. Roof water from both existing poultry houses is discharged to the same field drain via a piped drainage system. The applicant advised that storm water from roofs and clean surface water from the proposed development will discharge to the same field drain via a piped drainage system. The applicant further advised that currently the storm water discharge points are regularly checked and monitored.

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 existing discharge points are not identified on-site.

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.

There has been no sampling by the applicant of groundwater in the neighbourhood of the site to establish baseline conditions of groundwater quality.

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. This is particularly important when considering the significant increase in production.

There is currently no surface water quality monitoring scheme in place to determine water quality at the discharge point.

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. This is particularly important when considering the significant increase in production.

Water Supply:

The applicant advised that the existing poultry houses and proposed poultry houses are and will be supplied with water from the Aughnashelvey GWS. The applicant further advised that the GWS is tested in line with Bord Bia requirements and that the water results to date have been satisfactory. This office has not been made aware of any issues regarding this water supply. There is also one deep bored well on site which is the back-up supply of water to the site. The well head is protected by a concrete surround and lid. Due to the location of the well on-site, there was no evidence to suggest that the well is or will be in danger of being contaminated by surface water or soiled water. The applicant however advised that the well water supply is not tested.

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.

Waste:

There is currently 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 Michael Galligan, Gortnaleck, Ballyconnell, Co. Cavan an authorised Animal By-products plant located at Redhills Co Cavan and that the same arrangement is proposed for the new facility.

It is recommended, given the increase in capacity, that adequate and suitable storage facilities are maintained by the applicant for the storage of dead bird carcasses on site and removed as often as necessary and in any event before the storage containers overflow.

It is recommended that all other waste products are disposed via a contactor or 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:

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 in light of the proposed increase in production and particularly during the construction phase that the applicant is advised to continue to monitor noise. That work on-site is limited to day time hours 06:00am – 20:00pm to avoid any noise nuisance occurring and no work to be carried out on Sundays or on public holidays.

Pest Control:

Pest control measures are currently carried out by a contractor ECO Labs on behalf of the applicant. It is proposed that this arrangement will continue for the new facility. 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 on-site.

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 on site.

Oil Storage:

The applicant stated that he does not store oil on the existing site nor does he intend to store oil on-site and that gas is used to heat both existing houses. The applicant intends to use the same heating system for the proposed development.

A back-up generator will be used on-site which will be powered by diesel. The applicant was uncertain as to whether or not the generator incorporates a self bunded system.

It is recommended that the applicant investigate if the generator is self bunded or not. In any event it is recommended that a condition of the licence stipulate that the applicant must ensure that the diesel generator is bunded to avoid any accidental leakage of fuel to surface or ground water.

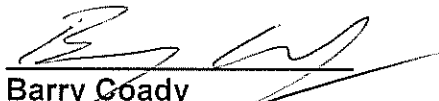
Chemical Storage

A very small amount of chemicals are stored in a designated locked bunded storage area in the meal store 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:

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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