Submission	
Submitter:	Miss Mariesa Rushe
Organisation Name:	HSE
Submission Title:	HSE Submission Crayvall Egg Production Ltd, P1120-01
Submission Reference No.:	S005887
Submission Received:	10 December 2019
Application	
Applicant:	Crayvall Egg Production Limited
Reg. No.:	P1120-01
See below for Submission details. Attachments are displayed on the following page(s).	

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Louth County Council,
Millennium Centre,
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Dundalk,
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A91 KFW6

10th December 2019

RE: Industrial Emissions (IE), Crayvall Egg Production Limited, Carrickbaggott, Grangebellew, Louth

To Whom it may concern

Please find enclosed the HSE consultation report in relation to the above Industrial Emissions Application. If you have any queries regarding this report, the initial contact is Tara Woods, Principal Environmental Health Officer, who will refer your query to the appropriate person.

Yours sincerely

Tara Woods
Principal Environmental Health Officer

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

6th December 2019

Re: Review of Industrial Emissions Licence

Class and Nature of Activity: The principal activity is – *'The rearing of poultry in installations where the capacity exceeds 40,000 places.'*

Applicant: Crayvall Egg Production Limited

Location of Facility: Carrickbaggott, Grangebellew, Co. Louth, A00 AA00

EPA Reference No: P1120-01

EHIS Ref No: 1038

Description of project:
The proposed poultry farm will operate as a c. 60,000 place free range layer farm. Planning permission has been granted by Louth Co. Council for the facility. The stock for this farm will be brought from specialised pullet rearing farms at c. 16 weeks of age. The birds remain on the site/range area for the laying cycle (c. 56 – 60 weeks on average) and are removed at c. 72 – 76 weeks of age. Stocking rates are based on current standards as prescribed by Bord Bia.

The house will be subdivided into 4 subsections of 15,000 birds and will operate on a rotational basis, whereby one section will be de-stocked and re-filled on average every three months. The houses will be carefully cleaned down between flocks.

The birds will be sub-divided into sub-colonies of not > 4,000 birds and will have free access to move internally around the house albeit in each sub-colony area. Birds are housed on a solid floor, with access to feed, water and nest boxes. Automated feeding and drinking systems and manure and egg conveyors will be in operation. The free range house will

have pop-holes along each side open during daylight hours to allow bird's access to the paddock areas.

Working hours on this site will be from 08.00hrs to 18.00hrs, however the automated feeding, ventilation, manure removal systems will operate outside of these hours. The proposed development will seek approval under the Sustainable Egg Assurance Scheme (EQAS).

Site Location:
The site is currently a greenfield site. A baseline screening report is not included with this application.

Public Consultation:
I could not locate any evidence of public consultation with regard to this development in the documents submitted by the applicant.

Noise:
It is stated by the applicant there will be no noise emissions as a result of the proposed facility. It is claimed the noise emissions will be reduced by the use of automated feeding and ventilation systems. It is also stated that the location of the site will ensure that noise emissions do not cause an adverse impact on any sensitive receptors. I could not locate any specific assessment carried out by the applicant regarding the impact of noise on the surrounding area. I did not review this proposal at planning stage. The planners decision report from Louth County Council makes no mention of concerns regarding noise from the proposal.

Water:
The water supply to the site will be from a deep well to be located on-site and/or the Ballymakenny/Sandpit Water Scheme. The estimated usage per year is 4,800m³, (c. 12m³/day on average). Water is to be stored in an on-site water storage tank with a capacity of c. 25m³.

Water is used for two main purposes:

(a) Drinking water for livestock. Water is to be supplied ad-lib to the birds via a highly efficient button nipple drinking system. This system will have cups under each nipple so that no water is wasted.

All animal drinking appliances will be regularly maintained to ensure that there is no leakage to the manure storage structures.

(b) High pressure wash down systems (3,000 psi). The proposal is to clean down each house after each batch of birds. Houses will be primarily blown down with limited washing. It is stated this 'dry cleaning' will require no wash water but soiled water collection tanks have been allowed for so as to facilitate a washing process if and when it occurs.

Surface Water:
There will be separation of clean and dirty water systems for the proposed facility. Clean surface water (roof water and clean yard water) will be collected by drains around the existing houses and disposed of on site.

Manure:
Any poultry manure generated from the proposed development will be used as an organic fertiliser on customer farmlands. A significant amount of customer farmers with capacity for in excess of 130% of the manure generated have been identified. The estimated manure production as a result of the proposed development will be c. 2,223.94 tonnes/annum net. Any poultry manure generated will be moved to the proposed manure stores automatically on a weekly / bi-weekly basis, pending application to the customer farmers lands. Provision has been made on site for 6 months storage capacity for manure on site. It is also stated the button nipple drinking system to be used will ensure that the manure remains as dry as possible.

Soiled Water:
Soiled water from the proposed development (where applicable) will be collected in dedicated soiled water collection tanks. Estimated soiled water production will be c. 100 m^3/annum. This soiled water will then be applied to approximately 4Ha of tillage lands, adjacent to the site. It is stated the organic N stocking rate on these lands is c. 0 kg organic N/Ha, as they are exclusively tillage lands. The application of an c. 100 m3 of soiled water to these lands with an estimated Organic N content of c. 1.37 kg organic N/m3 will increase the organic N application rate on the these remaining farmlands from the proposed development to c. 34 kg organic

N/Ha, well inside the 170 kg organic N/Ha limit. Alternatively this soiled water can be allocated to the customer farmers.

It should be noted that the site is located over a Poor Aquifer with a Moderate to Extreme/Rock Outcrop vulnerability so additional care must be taken by the applicant. It is stated that all soiled water will be applied in accordance with EU(Good Agricultural Practice for Protection of Waters) Regulations 2017.

Waste:
Paper, plastics and fluorescent tubes will be transported off site for recycling by specialist contractors. An estimated 0.6 tonnes of mixed waste per annum will be sent to landfill. Animal tissue/carcases/egg waste will be transported off site for rendering. It is estimated <5 tonnes of animal tissue will be generated per annum. This will be stored in sealed skips and transported off site for rendering.

An onsite wwtp shall be provided for staff sanitary facilities.

Odour:
It is stated by the applicant that potential air emissions from the farm are limited to the normal respiration gases, and associated emissions from within the houses. Odour emissions are to be reduced by the use of automated feeding and ventilation systems. Houses will be stocked at optimum stocking levels, i.e. not overstocked. The applicant also states that the site is located so as to ensure that such emissions do not cause an adverse impact on any sensitive receptors. I could not locate any site specific assessment of the impacts of odour from the proposed development.

Energy
The applicant estimates that 120 mwh will be the energy usage per year. The applicant has proposed to reduce energy by:

- No supplementary heating will be provided.
- Fluorescent tubes used for efficiency.
- Day/night economy rate electricity utilised.
- Incorporate improved insulation standards in all buildings.

Complaints:
I could not locate any proposals for how complaints were to be dealt with regarding the facility should they arise.

Closure & Decommissioning:
Proposals for the closure of the facility have been discussed by the applicant.

Conclusions:

1. A formal complaints procedure shall be implemented to resolve any possible issues or community concerns in relation to traffic, noise, odour or other nuisance complaints.

Lisa Maguire

Lisa Maguire
Environmental Health Officer

Mariesa Rushe
Environmental Health Officer

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