



### Submission

Submitter:	Mr Andrew Curtin
Submission Title:	HSE Submission
Submission Reference No.:	S006076
Submission Received:	26 June 2020

### Application

Applicant:	Mr Donal Mulcahy
Reg. No.:	P0898-02

See below for Submission details.

Attachments are displayed on the following page(s).

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**Date:** 26 June 2020

**Name:** EPA  
Environmental Licensing Programme  
Office of Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

**Re:** Industrial Emissions Licence Application

**EPA Reference:** P0898-02

**Name and Address of applicant:** Mr Donal Mulcahy, Ballintober East, Newcastlewest, Limerick

**Location of facility:** Ballintober East, Newcastlewest, Co. Limerick

**EHIS Reference:** 1201

Dear Sir/Madam

Please find enclosed the HSE consultation report(s) in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Mr Andrew Curtin Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully,

  
Andrew Curtin  
Principal Environmental Health Officer

## Introduction

The following HSE departments were notified of the consultation request for the licence application on 4 June 2020

- Emergency Planning – Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Maria Bridgeman

This report only comments on Environmental Health impacts of the licence application.

## General

Mr Donal Mulcahy has applied for a review of an Industrial Emissions Licence (P0898-01) for Donal Mulcahy Poultry Growing operation at Ballintober, Newcastlewest, Co. Limerick. In November 2019, Limerick County Council granted planning permission (P19/88) for the redevelopment of the site to which this licence applies. The redevelopment of the site includes the construction of two poultry houses along with all ancillary structures including meal storage bins and soiled water tank and all associated site works.

Mr Mulcahy currently operates four poultry houses with a capacity of 83,000 birds at a location adjacent to the application site. The two proposed poultry houses will have the capacity to accommodate 40,000 birds each.

As this activity falls within Category 6.1 (a) of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions licence is required. A review of the original licence (P0898-01) is required as

- there is an increase in the capacity of the poultry houses
- there are new emissions points
- there are site related changes

The Site Operation Report accompanying the licence application describes the main activities carried out on site which are associated with the raising of poultry from day old chicks to 42 day old birds. This involves:

- Transporting day old chicks to the farm from a hatchery
- Feeding and rearing the birds
- General animal husbandry practices
- Transport of feed to the farm by designated lorries
- Transport of birds from the site to one of three chicken processing plants in Ireland
- Removal of litter from houses and transport off site
- Washing of houses between each batch to maintain health and ensure minimal disease

- Bedding houses in preparation for the next crop
- Maintenance of buildings and equipment
- Recording and monitoring of internal house environment and bird performance and mortality.

All commitments to future actions including mitigation and further testing have been taken as read, and all data has been accepted as accurate. No additional investigations/measurements were undertaken in the review of this application.

The Environmental Health Service has not received any complaints regarding Mr Mulcahy's existing poultry facility.

In respect of this application, the areas reviewed were those of concern to Environmental Health and which are:

- Any potential contamination of surface or ground water
- Emissions to air including odour and noise
- Waste

Mr Seamus Kenny Environmental Health Officer visited the location to assist in the preparation of this report.

The material submitted in this licence application was reviewed with reference to 'BAT Reference Document for the Intensive Rearing of Poultry and Pigs' (2017).

### Site location

Mr Mulcahy's Poultry Growing Operation is located in a rural setting approximately 6km south east of Newcastlewest, Co. Limerick and approximately 4km due west of the village of Feohanagh. The area is primarily agricultural and dwellings in the vicinity are dispersed and mainly associated with farming and intensive agricultural activities. The nearest property is Mr Mulcahy's home and is located 40m from the site. Another occupied dwelling is situated 180m northwest of the proposed site. There are three further properties within 400m of the facility.

The proposed poultry houses will occupy approximately 1.2 hectares of Mr Mulcahy's 52 hectare farm. The site of the proposed development is currently used for the production of silage. On completion of the additional houses the poultry growing facility will occupy a total of 3.5 hectares.

The site is located off a local third class road, 1.5km from the R522 which is the regional road between Newcastlewest and Feohanagh.

Mr Mulcahy has operated an EPA licenced poultry facility at this location since March 2011 (EPA Licence Reference P0898-01). The existing facility comprises four poultry houses with a total capacity of 83,000 broilers.

- **Surface and Ground water**

The Environmental Health Service has considered any potential risk of contamination of surface water and makes the following comments:

There are no proposed emissions to surface or ground water. It is noted in Chapter 7.2 'Study Assessment and Methodology' that both a desk based study and a number of site visits were undertaken in the preparation of the EIAR.

The soils in the area are described as well drained basic mineral soils and the site of the proposed development is generally level.

The site is located in the Shannon Estuary South water catchment area. The Lower River Shannon SAC is approximately 6.5km south west of the site and the Blackwater SAC is 10km to the south east of the site.

The nearest watercourse to the facility is the Arra River which is a tributary of the River Deel and which is located 240m from the facility.

Clean surface water from hard standing areas and rainwater from roofs at the existing facility is collected in a storm water collection system and currently discharges to a land drain.

Washwater from the cleaning of the poultry houses is directed to soiled water storage tanks prior to being spread on local land as fertiliser.

The site is served by a public water supply. It is noted in Limerick City Council's Planning Report in respect of the application for permission to construct the two additional poultry houses that there is a well on site which is used as a supply for farming activities. **It is recommended that the licence condition should state that water from the private well on site should not be used for the poultry growing operation.**

**The Environmental Health Service (EHS) further recommends that**

- **Certification is provided to ensure the integrity of the well lining and seal as outlined in the Planning Report (Limerick City and County Council File No. 19/88 1 (c))**
- **Restriction on the use of the well as a water supply for the poultry growing operation is included as a condition of the licence**
- **Monitoring of the well is undertaken on an annual basis. Water quality should be assessed against the parameters specified in the Drinking Water Regulations (S.I No. 122 of 2014).**

It is further recommended that the following mitigation measures referred to in Chapter 7.5 'Mitigation Measures' of the EIAR are implemented in full in order to minimise the risk to water quality in the vicinity of the proposed development and to public health

- Drainage from the yard and roofs must pass through a SuDS surface water drainage system, which would reduce the rate of emissions and remove suspended solids. The system is to include a silt trap, oil interceptor and soak pits.

- The Environmental Health Service supports the recommendation that *'a purpose designed removable drip tray will be provided beneath collection points to catch any residual oil during filling and disconnection of the flexible tanker hose.'*

It is noted that all oils and fuels required on site are stored in bunded containers/areas with adequate bund provision to contain 110% of the largest tank capacity.

- **Soiled water, poultry litter and waste management**

The EIAR accompanying the application explains that soiled washwater following cleaning out of the houses between each crop of birds is collected and stored prior to spreading it on the applicant's land.

From the 'EPA Site Plan' which accompanies the application it is noted that there are four soiled water storage tanks, with a combined total capacity of 96m<sup>3</sup> serving a total maximum capacity of 83,000 birds. The proposed two additional poultry houses will have a total capacity of 80,000 birds. From information provided it is proposed to provide one additional soiled water storage tank with a capacity of 30m<sup>3</sup>.

**Clarification is required that a minimum of six months washwater storage capacity is available for the enhanced poultry growing facility of 163,000 birds.**

**The Environmental Health Service is unable to locate any reference to the proposed frequency of emptying of the washwater storage tank and it is recommended that this is clarified and specified in the conditions attached to the granting of the licence.**

**It is recommended that high level monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow. This is recommended for the protection of nearby watercourses and in the interest of the protection of public health.**

**When constructed, the wastewater storage tank should be inspected by a Chartered Engineer and certified as structurally sound for their intended purpose. The Environmental Health Service recommends that tanks are inspected annually to check their structural integrity.**

It is noted that the applicant intends to spread collected washwater on his lands. It is recommended that compliance with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' is included as a licence condition.

The Environmental Health Service recommends that all litter including bedding material, feathers and manure is removed to a covered trailer for immediate removal by a named licenced haulier prior to transportation to a specified mushrooms composting facility.

The Environmental Health Service recommends that

- The name of the licenced haulier and the compost facility is specified in the licence
- Poultry litter is not removed during periods of heavy rain. This is in order to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.

The 'Site Operation Report' states that dead poultry carcasses will be placed in a closed skip on the farm prior to being transported off site by Mr Michael Gilligan. It is recommended that storage containers have sufficient storage capacity and that the containers are of steel construction and are water, pest and topple proof.

- **Water supply**

Chapter 12 'Water (Hydrology) of the EIAR states that there is no flood risk for this site and that 'there is one emission point to surface water from the roof water'. It is noted that there is one well on site but that the poultry growing facility will be supplied by the public water supply and the well will not be used for this purpose.

- **Nutrient Management Plan**

**Due to the increase in the capacity of the poultry houses it is recommended that the applicant monitors ground nutrients on his lands by way of a Nutrient Management Plan (NMP) which should be updated annually.**

- **Noise**

Chapter 8 'Noise and Vibration' states that a baseline noise survey has been undertaken with background noise levels recorded at three noise monitoring locations on 15 November 2018. Monitoring was undertaken during the day and at night and *coincided with the removal of broilers from the existing poultry houses'*

The area in which the Donal Mulcahy Poultry Growing Operation is located is rural in nature with residences in the area situated along the existing road network. The main noise source from the existing facility is from the ventilation system (fans and motors) associated with the poultry houses. Daytime baseline noise levels at the three monitoring points were between 46.7 dBL<sub>Aeq</sub> and 47.2 dBL<sub>Aeq</sub> and night time noise levels were recorded at between 31.1dBL<sub>Aeq</sub> and 32.3dBL<sub>Aeq</sub>. The sources of noise during the baseline recordings were road traffic, trucks leaving the poultry facility and forklifts operating at the facility.

The Environmental Health Service is aware of four similar facilities within a 6km radius of Donal Mulcahy's Poultry Growing facility and recommends that deliveries and removal of poultry manure/casualty carcasses are co-ordinated within the locality, where possible. In order to minimise the impact on the nearest noise sensitive receptors from traffic noise at this facility, it is further recommended that

- Deliveries are limited to daytime hours. Any operations which have to be undertaken outside these hours must be notified in advance to the nearest sensitive receptors
- Vehicle engines should be switched off when not in use
- Access roads should be maintained in good condition

The Environmental Health Service recommends that a programme for the inspection and maintenance of ventilation fans is put in place to minimise the potential impact of noise from the ventilation fans on sensitive receptors

- **Odour**

Potential sources of odour from this facility will be from the poultry sheds, storage of casualty carcasses, cleaning of houses and the collection of litter and the spreading of wash water on land.

Odour dispersion modelling was undertaken in the preparation of the EIAR for Donal Mulcahy's Poultry Growing operation. The result of the odour modelling predicted that the siting of the new poultry units would not impact on nearby sensitive receptors.

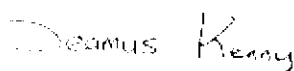
The Environmental Health Service recommends that the mitigation measures proposed in Chapter 9.6 'Mitigation Measures' of the EIAR should be incorporated into the conditions of the licence to minimise the impact of odour from the facility on the nearest sensitive receptors.

### **Conclusion**

The Environmental Health Service makes the following recommendations in respect of this application –

- **Certification is provided to ensure the integrity of the well lining and seal as outlined in the Planning Report (Limerick City and County Council File No. 19/88 1 (c))**
- **Restriction on the use of the well as a water supply for the poultry growing operation is included as a condition of the licence**
- **Monitoring of the well is undertaken on an annual basis.**
- **Drainage from the yard and roofs must pass through a SuDS surface water drainage system, which would reduce the rate of emissions and remove suspended solids. The system is to include a silt trap, oil interceptor and soak pits.**
- **Clarification is provided that a minimum of six months washwater storage capacity is available for the enhanced poultry growing facility of 163,000 birds.**
- **Details are provided regarding the frequency of emptying of the washwater storage tank**
- **High level monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow. This is recommended for the protection of nearby watercourses and in the interest of the protection of public health.**
- **When constructed, the wastewater storage tank should be inspected by a Chartered Engineer and certified as structurally sound for their intended purpose. The Environmental Health Service recommends that tanks are inspected annually to check their structural integrity.**
- **Compliance with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' is included as a licence condition.**

- All litter including bedding material, feathers and manure is removed to a covered trailer for immediate removal by a named licenced haulier prior to transportation to a specified mushrooms composting facility.
- The name of the licenced haulier and the compost facility is specified in the licence
- Poultry litter is not removed during periods of heavy rain. This is in order to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.
- Carcase storage containers are constructed of steel and are water, pest and topple proof.
- A Nutrient Management Plan (NMP) is implemented by the applicant which is updated annually.
- Deliveries are limited to daytime hours. Any operations which have to be undertaken outside these hours must be notified in advance to the nearest sensitive receptors
- Vehicle engines should be switched off when not in use
- Access roads should be maintained in good condition
- A programme for the inspection and maintenance of ventilation fans is put in place to minimise the potential impact of noise from the ventilation fans on sensitive receptors
- The mitigation measures proposed in Chapter 9.6 'Mitigation Measures' of the EAIR should be incorporated into the conditions of the licence to minimise the impact of odour from the facility on the nearest sensitive receptors



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