



Submission

Submitter:	Mr. John Moynihan
Organisation Name:	Health Service Executive
Submission Title:	Rec'd by post
Submission Reference No.:	S006077
Submission Received:	02 July 2020

Application

Applicant:	Kilfilum Limited
Reg. No.:	P1031-02

See below for Submission details.

Attachments are displayed on the following page(s).

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Environmental Health Service,
Unit 4 Liber House,
Monavalley Business Park,
Tralee,
Co. Kerry,

Phone: 066-7184992 / 064-6670760

Date: 1st July 2020

Our reference: 1204

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

EPA reference: P1031-02

Type of Consultation: Industrial Emissions

Applicant: Mr. Colm Ryan of Kilfilum Ltd, Nantinan, Milltown, Co Kerry

Dear Sir/Madam

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

Yours faithfully,


John Moynihan
Principal Environmental Health Officer



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Nature of Activity:

Classes and Nature of Activity in accordance with the EPA Act 1992 as amended			
Class of Activity	Main Activity	EPA Act Sector (where applicable)	Class of Activity Description
6.2	Yes	Intensive Agriculture	the rearing of pigs in installations, whether within the same complex or within 100 metres of that complex, where the capacity exceeds 1,000 units on gley soils or 3,000 units on other soils and where units have the following equivalents- 1 pig = 1 unit,

Introduction

The following HSE departments were notified of the consultation request for the licence application on 5th June 2020

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Ger Reaney

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

General

The EHS notes 3rd party submissions with regard to alleged detrimental effects from the existing odour from the site. These are a matter of public record.

Site Location:

The location of the existing pig farm is at Nantinan, Milltown, Co. Kerry. The site is located c. 2.7km to the south of Milltown, c. 5.0 km east of Killorglin. The town of Castlemaine is located to the north, approximately 5.8 km from the existing pig farm. The townland of Ballyvirrane is situated north of Nantinan to the south are the townlands of Coolbane East, Coolroe East, Coolroe West.

The total area of the site existing site is 2.7 Ha and is c. 220 m from the road along the site's southern boundary. The closest third party dwelling house is approximately c. 400m east of the site. The area is rural with a low density population. The site of the pig farm is surrounded by land used for forestry and extensive grassland.

Water Supply:

Water is supplied from a private well located on-site, and backed up with a public supply, and stored in a water storage tank(s) with a capacity of at least 24 hours supply. The estimated water used per annum will be c. 7,000m³.

The EIAR did not provide adequate information on local ground water supplies in the area. The applicant should consult the Geological Survey of Ireland (GSI) well database (www.gsi.ie) in order to identify local wells that may exist. In addition to this the applicant should carry out a door to door well survey of dwellings in close proximity (300m of site boundary) as the GSI well database is not exhaustive in terms of the locations of all wells in an area (as the database relies on the submission of data by drillers and the public, etc.). This is to ensure water supplies are protected both from the operation of the proposed development and to ensure compliance with Part 4 of the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017.

The EIAR states that there will be a public supply of water for backup; however no further information is given on where this supply of water is being sourced.

If the onsite private well is to be used as drinking water for human consumption the water must be tested to ensure it meets the parameters of the European Union (Drinking Water) Regulations 2014.

Soiled Water:

The EIAR states that soiled water from the proposed development where applicable will be collected in the manure storage tanks and dealt with as organic fertiliser in accordance with S.I. 605 of 2017. Adverse effect on ground water from the pig farm should be nil, as there will be no process discharge to ground and minimal risk of accidental leakage or spillage of polluting liquid on the site. The pig farm, as per the existing activities, is mass concrete manure storage tanks. The only soiled water from the pig farm will arise due to washing down of the pig house, and solid passageways, which will be diverted to the manure storage tanks. As previously detailed there will be no intensification of activities on the farm and no increase in manure volumes, thus there will be no increased risk to groundwater in the area of the farm.

The estimated annual manure production on the pig farm will be a total of c. 5329m³, and the fertiliser plan submitted with this application confirms a capacity for 189.5% of the organic fertiliser production.

All manure to be moved off site for use by the applicant or customer farmers in line with the requirements of S.I. 605 of 2017.

The EIAR states that any future replacement structures will be completed to D.A.F.M. specifications and with leak detection systems underneath, with proper storm and soiled water separation and collection facilities.

The EHS recommends that the applicant is made aware that the following applies to all intensive pig farm manure and soiled water storage structures and the following requirements should be met:

- 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 pig 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 Pig Manure and the conditions therein.

It is recommended that the applicant install High Level Monitors to the proposed soiled water tanks in order to minimise the risk of unintentional overflow. It is further recommended that the applicant monitor and empty the soiled water tanks before they reach their capacity again to avoid any unintentional overflow.

Ground & Surface Water:

The EIAR states that there will be no discharge of soiled water or effluent from the pig farm to surface water and so the pig farm will not have any significant impact on surface waters.

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 license 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 neighborhood of the site and of the land spreading areas. Periodic water quality

monitoring of the relevant parameters as per license should be carried out appropriate test wells should be provided at the site of the pig unit.

It is recommended that conditions of the license stipulate that a surface water quality monitoring scheme is put in place and that the baseline conditions of the groundwater are established in the neighborhood of the site and of the land spreading areas. That periodic water quality monitoring is established for the relevant parameters and that relevant records are maintained by the applicant for inspection.

Waste:

Carcasses will be stored in a covered sealed container on site, awaiting collection by an authorised contractor. Ward Waste Products Ltd is an authorised contractor who regularly removes these carcasses. They are transported in sealed skips to the Animal By-products plant at Tournafulla, CO Limerick, in compliance with existing Dept of Agriculture regulations.

The EIAR states that the two hazardous wastes generated at this site are veterinary waste/sharps and spent fluorescent lighting tubes and veterinary materials used. The annual quantity of each of this class of waste generated on the site is and will be minimal. It is proposed to accumulate the used fluorescent tubes in a specialised storage area in the site pending periodic disposal at the local civic amenity centre. Alternatively, these tubes may be returned to the supplier.

It is recommended that the applicant ensure that there is adequate storage for carcasses.

Odour:

It is noted that a number of submissions have been received by the EPA in relation to odour from the installation. No assessment of odour from the site has been provided in the EIAR. EHS advises that an assessment of the impact of odour emissions from the activity and the impact of odour emissions on local residents should be carried out. The EPA's published report entitled Odour Impacts and Odour Emission Control Measures for Intensive Agriculture should be referenced. The EHS also recommends that the odour management plans includes a robust complaints procedure whereby any complaints from the local population are recorded and appropriately investigated.

The Environmental Health Service has not received any odour complaints regarding this facility.

Noise:

The EHS is satisfied that noise generated from the proposed development will not cause a nuisance. The site is located in a rural environment and there is a significant distance to third party dwellings which would suggest that the proposed development is not likely to have any adverse noise impact. The EHS has not received any noise complaints regarding this facility.

There will be no source of significant vibration on the site.

Pest Control:

The EIAR states that a pest control programme is to be practiced on farm in line with Bord Bia requirements.

The procedure for pest control for the proposed development is a vital element of the management of this development. The developer should set bait at various strategic locations around the houses and maintain a weekly check and associated records. A map outlining the locations and numbers of baiting stations should be drawn up. A "Baiting Checklist" should be

kept, recording details of Bait Station number, comments, actions and dates. Recorded checks should be carried out on a weekly basis and ameliorative action taken when/if necessary.

Conclusion:

Other than the observations stated above, the Environmental Health Service have no further concerns at this time regarding this proposed development.



John Moynihan
Principal Environmental Health Officer



Thomas Mangan
Environmental Health Officer

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