



Submission

Submitter:	Mr Andrew Curtin
Submission Title:	HSE Submission
Submission Reference No.:	S006095
Submission Received:	29 July 2020

Application

Applicant:	Mr Eamon Scanlon
Reg. No.:	P0903-02

See below for Submission details.

Attachments are displayed on the following page(s).

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T: 00353 (0)61 461502 / 04 / 05

Date: 28 July 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: P0903-02

Name and Address of applicant: Mr Eamon Scanlon, Dromroe, Ballagh, Co. Limerick

Location of facility: Dromroe, Ballagh, Co. Limerick

EHIS Reference: 1234

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

Building a
Better Health
Service

Seirbhís Sláinte
Níos Fearr
á Forbairt

Date: 27 July 2020

Our reference: EHIS 1234

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

Type of Consultation: Industrial Emissions

Applicant: Mr Eamon Scanlon, Dromroe, Ballagh, Co. Limerick

Nature of Activity: The rearing of poultry in installations where the capacity exceeds 40,000 places

EPA reference: P0903-02

Introduction

The following HSE departments were notified of the consultation request for the licence application on 25 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.

Mr Eamon Scanlon has applied for a review of an Industrial Emissions Licence (P0903-01)) for Eamon Scanlon Poultry Growing operation at Dromroe, Ballagh, Co. Limerick. Planning permission was granted by Limerick County Council on 21 November 2012 for the construction of two poultry houses, two soiled water tanks and associated site works at Dromroe, Ballagh, Co. Limerick.

Mr Scanlon currently operates and manages two poultry houses with a capacity of 27,000 and 25,000 birds (52,000 total) adjacent to the application site. The two proposed poultry houses will have the capacity to accommodate 27,000 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 (P0903-01) is required as

- there is an increase in the capacity of the poultry houses
- there is an increase in emissions and
- 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 which are:

- Bedding of houses with straw/wood shavings before stocking
- Placing of day-old chicks in the broiler houses
- Delivery of feed to farm
- Feeding and rearing of birds until slaughter weight has been achieved (between 35-52 days)
- Catching and removal of chickens for slaughter
- Removal of manure from houses and transport of site for recovery/disposal and
- Washing of houses between batches

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 Scanlon'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 on 24 July 2020 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 Scanlon's Poultry Growing Operation is located in a rural Co. Limerick approximately 7km south east of Newcastle West. Agriculture is the primary activity in the area. Conflicting information is provided in the application regarding the location of the application site. The 'Introduction' section of the Operational Report states that the site is 'approximately 7km south east of Newcastle West' and Chapter 2.1 'Present Situation' of the Non- Technical Summary states that it is 'situated c.3kms north-east of Newcastle West, Co. Limerick'.

The poultry houses which are the subject of this licence application have been constructed adjacent to two existing poultry houses in the ownership of the applicant.

The nearest dwelling house is the applicants which is located approximately 60m from the facility. Another property is situated approximately 160m from the site, which is understood to be owned by a family member of the applicants.

The site is located off a local third class road in the townland of Dromroe, Ballagh, Co. Limerick 0.5km from the N21 Newcastle West and Adare.

There are no known sensitive receptors in the vicinity of the poultry growing facility.

Mr Scanlon has operated an EPA licenced poultry facility at this location since February 2011 (EPA Licence Reference P0903-01). The existing licenced facility comprises two poultry houses with a total capacity of 52,000 broilers (27,000 and 25,000 each).

- **Surface and Ground water**

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

The soils in the area are described as 'poorly drained soils, of clay loam to clay texture and of high to very high base status' with 'poor permeability' (Chapter 10.3.1 'Soils and Subsoils') There was no evidence of flooding when the facility was visited by the Environmental Health Officer and the site itself and land in its immediate environs appeared to be well drained.

The site is described as having 'no river or water bodies but contains a small drainage ditch which drains the site and surrounding agricultural land'.

Clean surface water from hard standing areas and rainwater from roofs at the existing facility is collected and piped to a land drainage ditch. The same will apply to the new houses.

Soiled wash water from the facility is collected in a dedicated soil water collection tank, which is located adjacent to the houses on site, prior to being spread on the applicant's land as fertilizer.

The site is served by a public water supply. There is also a 'poor quality on-site well' at the facility. (Chapter 10.3.3.4 Groundwater usage) Mr Scanlon has indicated that this well is used solely as a water supply for beef cattle reared on his farm.

It is recommended that water from this well is not used for the poultry growing operation

The Environmental Health Service (EHS) further recommends that

- 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 notes that mitigation measures to protect water quality appear to be limited to the construction phase of the facility and recommends that measures are implemented to protect surface and ground water quality during the operation of the Eamon Scanlon Poultry Growing facility. Measures should include, but not be limited to

- The provision of a removable drip tray beneath collection points to catch any residual oil during filling and disconnection of the fuel tanker hose.
- The storage of oils and fuels required on site in bunded containers/areas with adequate bund provision to contain 110% of the largest tank capacity.
- **Soiled water, poultry litter and waste management**

The Operational Report accompanying the application outlines that soiled washwater from the site is diverted to and collected in a dedicated soiled water collection tank, which is located beside the broiler houses on site, and is recovered and applied to the owners land.

Clarification is required that a minimum of six months washwater storage capacity is available for the enhanced poultry growing facility of 106,000 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 provided 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.

The Environmental Health Service recommends that waste water storage tanks are inspected annually to check their structural integrity.

It is noted that the applicant intends to spread collected washwater on his lands. Compliance with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' must be included as a licence condition. This is in the interest of public health.

The Environmental Health Service recommends that all litter including bedding material, feathers and manure is collected in a covered trailer for immediate removal by a named licenced haulier prior to transportation to a specified mushroom composting facility (Custom Compost).

The Environmental Health Service recommends that

- The name of the licenced haulier and the compost facility (Custom Compost, Co. Wexford) 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 'Waste Generated and Animal By-Products Generated Form' indicates that 11.45 tonnes of animal tissue waste will be generated and will be removed off site by an approved contractor to Waterford Proteins Ferrybank. The Environmental Health Service was unable to identify any reference in the application to on site storage facilities for broiler casualties.

It is recommended that containers for the storage of broiler casualties have sufficient storage capacity and that the containers are of steel construction and are water, pest and topple proof.

- **Water supply**

The Emissions Overview Attachment (Form 7.1) accompanying the EIAR indicates that there will be 3 storm water emission points. 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 6 'Noise' states that a baseline noise survey has been undertaken with background noise levels recorded at four noise monitoring locations over three weeks in December 2011. Monitoring was undertaken during the day and noise detected was due to road traffic. Daytime baseline noise levels at the four monitoring points were between 47dBL_{Aeq} and 51 dBL_{Aeq}.

The Environmental Health Service is aware of four similar facilities within a 6km radius of Eamon Scanlon'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.

The Environmental Health Service was unable to find any reference that odour dispersion modelling was undertaken in the preparation of the EIAR for Eamon Scanlon's Poultry Growing operation. It is noted in Chapter 3.2 'Air Quality' of the Non-Technical Summary that 'an odour management plan has been generated in order to establish the measures necessary to minimise odour'.

Significant odour was not detected during the Environmental Health Officer's site visit on 24 July 2020.

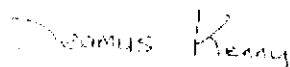
The Environmental Health Service recommends that the mitigation measures proposed in Chapter 5.5.2 'Mitigation Measures - Odour' of the EAIR should be incorporated into the conditions of the licence to minimise any impact of odour from the facility on the nearest sensitive receptors.

Conclusion

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

- **Restriction on the use of the well as a water supply for the poultry growing operation is included as a condition of the licence**
- **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 106,000 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.**
- **Wastewater 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 the Custom Compost 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 5.5.2 'Mitigation Measures - Odour' 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.



Seamus Kenny
Environmental Health Officer
Health Service Executive,
Newcastle West Health Centre,
Gortboy,
Newcastle West,
Co Limerick



Environmental Health Officer
Environment OU
Ennistymon Health Centre
Ennistymon
Co. Clare

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Curtin, Andrew

From: Cleary, Aisling on behalf of Mannix, Mai
Sent: 22 July 2020 15:50
To: Curtin, Andrew
Cc: Cosgrove, Breda
Subject: FW: Industrial Emissions Licence Application P0903-02 at Ballagh, Co. Limerick

Dear Andy,

As the Public Health Department has not been made aware of any health concerns in relation to this proposal, there would be nothing to add to the submission being made by Environmental Health at this time.

Kind regards,

Aisling Cleary

PA to Dr. Mai Mannix, Director of Public Health

Clerical Officer

Department of Public Health – Mid-West | 2nd Floor | Mount Kennett House | Henry Street | Limerick |(Eircode: V94 KN3N)
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Aisling Cleary,

Cúntóir Pearsanta le Dr. Mai Mannix, Stiúrtóir na Sláinte Poiblí,

Oifigeach Cléireachais

An Rannóg Sláinte Poiblí - An Mheán Iarthair | 2ú Urlár, | Teach Mhoin Cinit | Sráid Anraí | Luimneach | V94 KN3N.
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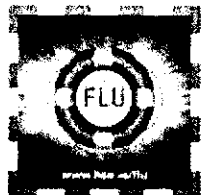


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From: Mulcahy, Helen **On Behalf Of** Kelleher, Kevin
Sent: 25 June 2020 16:59
To: Mannix, Mai
Cc: Kelleher, Kevin
Subject: FW: Industrial Emissions Licence Application P0903-02 at Ballagh, Co. Limerick

Kind Regards, *Helen* Helen Mulcahy, Assistant Staff Officer, National Office for Public Health/Child Health, Strategic Planning and Transformation, HSE Public Health Offices, Second Floor, Mount Kennett House, Henry Street, Limerick Tele. 061 483347. Email helent.mulcahy@hse.ie