



Submission

Submitter:	Mr Andrew Curtin
Submission Title:	HSE Submission
Submission Reference No.:	S006116
Submission Received:	17 September 2020

Application

Applicant:	Mr Thomas McEnery
Reg. No.:	P0901-02

See below for Submission details.

Attachments are displayed on the following page(s).

For inspection purposes only.
Consent of copyright owner required for any other use.



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
Health Service Executive West
Ashbourne Hall
Ashbourne Business Park
Dock Road
Limerick
V94 NPEO
T: 00353 (0)61 461502 / 04 / 05

Date: 29 September 2020

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

Seirbhíse Sláinte Comhshaoil
Halla Ashbourne
Páirc Gnó Ashbourne
Bóthar an Duga
Luimneach
V94 NPEO
T: 00353 (0)61 461502 / 04 / 05

Re: Industrial Emissions Licence Application Reference: P0901-02

Proposed development The rearing of poultry in installations where the capacity
Exceeds 40,000 places

Name and Address of applicant: Mr Thomas McEnery, Ballintober, Newcastlewest,
Co. Limerick

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

Date: 29 September 2020

Our reference: EHIS 1345

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

EPA Reference: P0901-02

Type of Consultation: Industrial Emissions Licence

Applicant: Mr Thomas McEnery, Ballintober, Newcastlewest,
Co. Limerick

Proposed development: The rearing of poultry in installations where the capacity exceeds 40,000 places

Introduction

The following HSE departments were notified of the consultation request for the licence application on 2 September 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 Thomas McEnery has applied for a review of an Industrial Emissions Licence (P0901-02) for his poultry growing operation at Ballintober, Newcastlewest, Co. Limerick. Limerick City Council granted the applicant permission for the 'construction of a new poultry house, meal bins, wash water collection tank and associated site works' in May 2016. (Ref: Limerick City Council 15/815)

There has been a poultry farm at this location for over 25 years and it has operated under EPA licence (P0901-01) which was issued in 2013.

The existing poultry growing facility operated by Mr McEnery has a capacity for 56,000 birds. The provision of the additional house, which is the subject of this application, will increase the total capacity to 96,000 birds.

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 (P0901-01)) is required as

- There is an increase in the capacity of the poultry houses
- There is an increase in emissions
- 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 over a six week period. This involves:

- 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 McEnery'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

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 Thomas McEnery's poultry growing facility is located in Ballintober East, Newcastlewest Co Limerick and is 7.5km to the south of Newcastlewest and 35km south west of Limerick city. The site is 1.7km from the Newcastlewest to Buttevant Road (R522). It is accessed by a private lane 400m in length which leads on to the public road. The total area of the site, including existing and proposed areas is 1.01 hectares.

Agriculture is the predominant activity in the locality, which is rural in nature with dispersed houses most of which are associated with farming and intensive agricultural activities. Lands surrounding the site are mainly grassland used for grazing and silage production with some tillage and are relatively flat. The nearest property is Mr McEnery's home and is located 150m from the site. Another occupied dwelling is situated 300m from the proposed site.

It is proposed to provide a secure fence around the site and for the 'natural colonisation' of earth embankments to screen the site and to blend it into the natural environment (Chapter 10 'Measures envisaged in order to reduce and if possible remedy significant adverse effects')

- **Surface and Ground water**

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

Clean storm water runoff from the site is collected by a storm water collection system and diverted to a single storm water monitoring point (SW1) from where it discharges to a small drainage ditch. This is in accordance with the existing licence and storm water from the proposed poultry house will also be linked to this monitoring point.

The Operational Report included with the application states that 'weekly visual inspections are undertaken to ensure discharge points are clear and of good quality' and that samples from SW1 are collected and analysed on a quarterly basis. Sample results are retained and included in the facility's Annual Environmental Report.

All soiled water from the site is diverted into the waste water storage tanks.

The site is close to a stream which forms part of the River Deel Catchment. A small drainage ditch is located adjacent to the facility which drains the site and adjoining agricultural land.

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

Chapter 3.8 'Services' of the EIAR states that the site is served by a private well.

The Environmental Health Service (EHS) further recommends that

- **Certification is provided to ensure the integrity of the well lining**
- **Monitoring of the well is undertaken twice per year. Water quality should be assessed against the parameters specified in the Drinking Water Regulations (S.I No. 122 of 2014).**

It is also recommended that the mitigation measures referred to in Chapter 6.4 (Description of Impacts and Mitigation Measures – Water) of the EIAR are implemented in full in order to minimise the risk to both water quality in the vicinity of the proposed development and to public health. It is noted that 'all major refuelling and maintenance events will be undertaken away from the site' and that 'washings from ready mix concrete lorries will not be allowed to flow into any drain or watercourse'.

It is noted that all oils and fuels required on site are stored in bunded containers

- **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 two soiled water storage tanks, with a combined total capacity of 37m³ (5000 gallons capacity for each tank) serving a total maximum capacity of 93,000 birds.

Clarification is required that a minimum of six months washwater storage capacity is available for the enhanced poultry growing facility of 93,000 birds.

The Non-Technical Summary states that 'soiled water arising from the washing down of the accommodation houses is utilised on agricultural land adjacent to the unit and amounts to approximately 16 vacuum tanks a year'. The figure provided in Chapter 6.3 of the EIAR 'Soils and Geology' is 'approximately 5 vacuum tanks a year'

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, and the predicated volume of washwater, are both clarified and specified in the conditions attached to the granting of the licence.

It is noted that high level monitors are installed on the washwater tanks to reduce the risk of accidental overflow. The alarms will indicate when the liquid stored within the tank comes within 1m of the top of the tank. Tank integrity testing will be undertaken (Chapter 6.4.1 Surface Water). **It is recommended that this testing is undertaken on an annual basis.**

The Environmental Health Service notes that 280 tonnes of poultry litter is currently generated on the poultry growing operation and that this figure will increase to 480 tonnes per annum on completion of the proposed development. The litter is removed by MJ Kehoe Transport Ltd immediately following cleaning out of the houses to Custom Compost in Co. Wexford for use as mushroom compost.

The Environmental Health Service recommends that 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.

It is anticipated that 7.4-7.5 tonnes of poultry tissue waste will be generated annually and that carcasses will be stored in a 'covered sealed metal skip for transport and disposal to a licenced rendering plant at regular intervals. It is noted that a register of all collections is maintained on site.

- **Noise**

Chapter 5.4 'Noise Levels' states that 'noise emissions from this unit are not audible at the site boundary' and that 'noise levels are generally low and typical of a quiet rural area during daytime'

Chapter 6.10 'Noise' states that a noise survey has been undertaken with background noise levels recorded at three noise monitoring locations on August 21st 2015. Monitoring was undertaken at

the boundary of the site, adjacent to the nearest occupied dwelling (the applicant's property) and at the junction with the public road approximately 400m from the proposed site of the new poultry house.

The area in which the Thomas McEnergy Poultry Growing Operation is located is rural in nature with the nearest third party residence located approximately 400m west of the facility. The Environmental Health Service was unable to locate Attachment 4 which contained the results of noise monitoring but reviewed the information contained in Attachment 5 of the previous licence application (P0901-01) which is relevant to the current application.

The survey concludes that the main noise source from the existing facility is from the ventilation system (fans and motors) associated with the poultry houses which was inaudible at a distance of less than 100m from the poultry houses. The dominant noise source at the monitoring locations was noise from wind rustling in trees.

Night time noise levels were recorded at between 42 dBL_{Aeq} (site boundary) and 44.6 dBL_{Aeq} (yard of applicant's residence)

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 are noted to be in good condition and should be maintained as such**

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 build-up of litter on concrete in buildings, removal and disposal of casualty carcasses and the maintenance of drains.

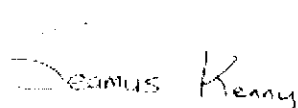
The Odour Management Plan concludes that any odours generated are 'not expected to cause a significant nuisance in the surrounding area' and that the applicant 'is committed to doing whatever is necessary to avoid issues arising' (Chapter 6.5.2 Odour')

The Environmental Health Service recommends that the mitigation measures proposed in Chapter 6.5.2 'Odour - 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.

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
- Monitoring of the well is undertaken twice per year.
- Mitigation measures referred to in Chapter 6.4 (Description of Impacts and Mitigation Measures – Water) of the EIAR are implemented in full in order to minimise the risk to both water quality in the vicinity of the proposed development and to public health
- That integrity testing of the soil water storage tanks is undertaken on an annual basis
- Poultry litter is not removed during periods of heavy rain
- 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 are noted to be in good condition and should be maintained as such
- 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 6.5.2 'Odour -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



Seamus Kenny
Environmental Health Officer
Newcastle West Health Centre,
Gortoy,
Newcastle West,
Co Limerick



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