

Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	HSE
Submission Title:	P1135-01
Submission Reference No.:	S006201
Submission Received:	10 December 2020

Application

Applicant:	Brady Poultry Limited
Reg. No.:	P1135-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
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Date: 10/12/2020

Our reference: 1453

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

EPA reference: P1135-01

Type of Consultation: Industrial Emissions

Applicant: Brady Poultry Limited, Drumbenagh, Tydavnet, County Monaghan.

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
6.1 (a)	Yes	Intensive Agriculture	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 16th November 2020

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – John Hayes

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

Site Location:

The site is located in a rural area within the townland of Drumbenagh. Access to the site will be via an existing private entrance and laneway that is just off a local, third class road. The area of the site is 0.857 hectares. The site is situated 3km north-west of Monaghan town. The existing and proposed poultry farming activities will be the only agricultural activities carried out by the applicants on this site.

Water Supply:

The water supply on the farm is from an existing on-site well. The Geological Survey of Ireland has classified the aquifer as locally important with a vulnerability rating of Moderate (Majority of site) to High (south east corner of site)

The EIAR has stated that adverse effect on ground water from the proposed development 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. In addition the EIAR states that activities on the site will be carried out on an impermeable concrete base, with proper storm and soiled water separation and collection facilities.

The only discharge from the site to surface waters will be the discharge of rainwater from roofs and clean yards to field drainage, which flows towards the adjacent watercourse a tributary of the Blackwater.

In addition to the above the EIAR states that During Operation

- All activities on site will be carried out in accordance with the Department of Agriculture, Food and Marine, Bord Bia, EPA and Monaghan Co. Co. requirements and specifications and/or industry standards.
- All organic fertiliser generated on site to be removed by a registered contractor for use elsewhere.
- All soiled water to be appropriately collected, stored and utilised in accordance with the requirements of S.I. 605 of 2017 as amended.
- All potentially polluting products (fuels, detergents etc.) to be stored in appropriately bunded areas.
- Stormwater discharge points to be checked and inspected on a weekly basis for any sign of contamination.
- Appropriate measures to be put in place to deal with any accidents etc. that have the potential to cause adverse environmental impact.

The proposed development, will operate on a dry manure basis, whereby the manure will be removed from the houses after each batch and transported off site, there is minimal risk to ground water supplies in the area of the site.

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.

Soiled Water:

Soiled water from the proposed development will be collected in dedicated soiled water collection tanks. There is an existing soiled water tank on site with a capacity of 45.74m³, an addition soiled water tank is proposed with a capacity of 15.9m³. Estimated soiled water production will be a total of c. 100 m³/annum, upon completion of the proposed development. This soiled water will then be applied to farmland in line with S.I. 605 of 2017, as amended.

It is recommended that the applicant is made aware that the following applies to all poultry manure and soiled water storage structures whether or not on the site of the unit:

- 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 poultry 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 Poultry 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.

It is recommended, given the significant increase in production and the size of the surrounding land on which soiled water can be spread, that the applicant monitors ground nutrients on his lands via a Nutrient Management Plan (NMP).

That the Nutrient Management Plan (NMP) is maintained by the applicant on site for the management of soiled-water arising at the facility and should include:

- Calculation of the quantity of manure and the amount of nutrients available from manure including any manure or other wastes imported.
- The results of soil fertility and drainage tests on existing or proposed land spreading areas.
- A representative soil sample, to a depth of 10cm, should normally be taken biennially from every 2 to 4 hectares and at least one per farm. However, where soil types are similar and cropping and treatments of the lands were the same during the previous 5 years or more, a composite sample from an area up to 12 hectares is acceptable.
- An assessment of the relationships between manure application rates, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- Ordinance Survey Maps to a scale of 1:10,560 showing the location of the said land spreading areas and all environmentally sensitive features on the lands or in their vicinity;

including *interalia* dwellings houses and sensitive buildings, drains, streams, watercourses and other sources of water supply.

- Agreements between 'importers' and 'exporters' of all animal manures or other wastes are required.

The Nutrient Management Plan should be up-dated and issued to the Agency for approval on an annual basis.

Storm/Surface Water:

The EIAR states that adverse effect on surface water from the proposed development should be nil, as there will be no process discharge to surface water and minimal risk of accidental leakage or spillage of polluting liquid on the site. The only discharge from the site will be clean surface water that will be directed to drains that are close to the site and it is likely that this water will then be directed to the river blackwater, which is 226m south of the application site.

The EIAR states that during operation, Stormwater discharge points will be checked and inspected on a weekly basis for any sign of contamination.

There will be no process discharge to surface water and minimal risk of accidental leakage or spillage of polluting liquid on the site.

Regardless of the ecological status of the surrounding water courses it is vital that the applicant take all due care in ensuring that there is no discharge of contaminated waters from the proposed development particularly during loading and cleaning.

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 relevant parameters as per license. Where appropriate test wells should be provided at the site of the poultry unit.

It is recommended that a condition 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 of the relevant parameters and that relevant records are maintained by the applicant for inspection.

Manure:

The estimated manure production upon completion of the proposed development will be a total of c. 680-700 tonnes / annum an increase of c. 375 tonnes from the c. 325 tons/annum produced by the existing enterprise. The EIAR states that all the poultry manure from the farm will be removed off site by an authorised contractor, McCarthy Contractors Ltd, on behalf of the applicant and in compliance with S.I. 605 of 2017, as amended.

Waste:

The EIAR states that dead animals and animal tissues will equate to approximately 500-750 kg/month. All dead animal waste will be accumulated in a sealed leak proof container on site for collection by Fallin Bird Ltd at 1 - 2 week intervals for transport to an authorised Animal By-products facility at Redhills, Co. Cavan.

It is recommended that the applicant ensure that there is adequate storage for dead birds particularly when the second house is constructed and that all other waste products are disposed of at Monaghan Co. Co. civic amenity center or returned to the supplier for recycling in a timely manner or removed by a licensed waste collector and that there is no accumulation of waste on site.

Odour:

The EIAR states that there is one third party dwelling within 100m of the proposed development.

The EIAR states that Emissions to air from the site will be small and will not cause significant annoyance and will not interfere with amenity outside the boundary of the site. It also states that odour emissions from the site may be increased at times when birds and/or manure is being removed from the site, however this will only occur for a short period in every cycle.

In addition section 4(3)(6) of the EIAR A outlines a number of management practices that will be implemented so as to minimise potential odour emissions from the existing and proposed developments. These practices are welcomed by the EHS.

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

Due to the close proximity of the third party dwelling to the proposed development the EHS recommends that the applicant be advised to continue to monitor odour from the installation. The EPA's published report entitled Odour Impacts and Odour Emission Control Measures for Intensive Agriculture should be referenced. The EHS also recommends that any odour management plans include a robust complaints procedure whereby any complaints from the local population are recorded and appropriately investigated.

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 would not be any source of significant vibration on the site.

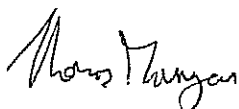
Pest Control:

The EIAR states that a rodent control programme will be developed to cover the proposed development. The programme as implemented on site will be in line with Bord Bia and Department of Agriculture, Food and The Marine requirements. Detailed records regarding bait point location, frequency of baiting and products used are to be maintained on site.

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 new house 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:

The current facility appears to be operated in a very efficient manner by the applicant. Other than the observations stated above, the Environmental Health Service have no further concerns at this time regarding this proposed development.



Thomas Mangan
Environmental Health Officer

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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 Ms Claire O'Dwyer, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Claire O'Dwyer
Principal Environmental Health Officer

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