

Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission
Submission Reference No.:	S006233
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Application

Applicant:	Mr. John Nash
Reg. No.:	P1137-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Health Service Executive

Environmental Health Service
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Seirbhíse Sláinte Comhshaoil
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Luimneach
V94 NPEO

Date: 23 December 2020

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

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

Re: Industrial Emissions Licence Application Reference: P1137-01

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

Name and Address of applicant: Mr John Nash, Moanleana, Newcastle West, 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

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Date: 23 December 2020

Our reference: EHIS 1466

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

EPA Reference: P1137-01

Type of Consultation: Industrial Emissions Licence

Applicant: Mr John Nash, Moanleana, Newcastle West, Co. Limerick

Proposed development: The rearing of poultry in installations where the capacity exceeds 40,000 places at Moanleana, Newcastle West, Co. Limerick

Introduction

The following HSE departments were notified of the consultation request for the licence application on 25 November 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 John Nash has applied for an Industrial Emissions Licence (P1137-01) for his poultry growing operation at Moanleana, Newcastlewest, Co. Limerick. Limerick City Council granted the applicant

permission for the construction of a two no. poultry houses allowing for an overall capacity on the farm of 140,000 places (Limerick City and County Council Reference 18/83)

Mr Nash is applying for a licence to operate a free range broiler farm with a maximum stocking number of 100,000 birds. There are currently three operational poultry houses on site accommodating a total of 68,000 free range broilers.

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.

The Non-Technical Summary accompanying the licence application describes the main activities carried out on site which are associated with the raising of poultry over an eight week period. This involves:

- Transport of day old chicks to the farm
- Feeding and rearing of birds.
- General animal husbandry practices.
- Transport of feed to the farm
- Transport of birds from site to factory at c. 56 days of age.
- Removal of litter from the houses.
- Transport of Litter off site.
- Washing of houses between each batch, for flock health and performance reasons.
- Bedding of houses with straw/shavings 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 Nash's 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 facility on 14 December 2020 to assist in the preparation of this report. It was noted that the site was in a clean, well maintained condition at the time of the visit.

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 John Nash's poultry growing facility is located Moanleana, Newcastlewest Co Limerick and is approximately 4.5km south of Newcastlewest and approximately 44km south west of Limerick city. The facility is accessed by a private lane which leads on to the public road. The total area of the site including existing and proposed areas is 1.8 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 facility are used for silage production and are generally flat. The nearest property is Mr Nash's family home which is located approximately 100m north east of the site. Another occupied dwelling is situated 140m from the facility.

The facility is screened by hedgerows, trees and fencing. The applicant will endeavour to provide further screening of the facility by planting additional hedgerows with native trees and shrubs.

- **Surface and Ground water**

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

Chapter 3.5 'Drainage Infrastructure' states that 'Surface water drainage at the John Nash facility is directed to the surface water tanks'. Clean water from the roofs is directed via surface water gullies to a drain from where it is piped into the site drainage ditch.

Three storm water drainage points are specified in '7.7 Discharges to Storm Water – Attachment' and are diverted to three storm water monitoring points before being discharged to Lisheenine Stream.

Monitoring of storm water will be undertaken by means of weekly visual and 'sniff' testing. 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 3.2 of the EIAR states that the water supply for the facility is supplied from a private well located within the site boundary and that there is also a connection to the public water supply.

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 7.52 Operational Phase of the EIAR are included as conditions of the licence in order to minimise the risk to both water quality in the vicinity of the poultry growing facility and to public health. It is noted that refuelling only takes place within a designated refuelling area located away from any open drains or gullies.

It is also 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, directed to soiled water storage tanks prior to using it for land spreading.

From the 'Site Plan' which accompanies the application it is noted that there are two soiled water storage tanks, with a combined total capacity of 14,000 gallons serving a total maximum capacity of 100,000 birds.

It is recommended that high level monitors are fitted to soiled water storage tanks and that tank integrity testing is undertaken on an annual basis.

The Environmental Health Service recommends that the applicant shall be requested to conform with the legal provision of article 23 (4) of S.I 31 of 2014 in respect of "an occupier of a holding shall provide such information as is requested relating to the movement of organic fertilisers on or off the holding". It should be a requirement of any licence issued that all such information is provided to the EPA well in advance of any slurry transportation so that potential land banks can be risk assessed and evaluated for suitability."

The Environmental Health Service notes that 750 tonnes of poultry manure is currently generated on the poultry growing operation. The litter is removed by Mr Jamie Dore 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 estimated that 10 tonnes of poultry tissue waste will be generated annually and that carcasses will be stored in sealed bins on site prior to removal by a licenced contractor.

- **Noise**

Chapter 8 'Noise and Vibration' states that a noise survey has been undertaken with background noise levels recorded at three noise monitoring locations, including at the site of the nearest sensitive receptor, on October 28th 2016.

The area in which the poultry growing facility is located is rural in nature with the nearest third party residence located approximately 140m to the west. The noise environment in the location is described as 'relatively low'. The main noise source at the facility arises from fans on the roofs of the poultry buildings and their motors.

The results of the noise monitoring baseline survey are detailed in Tables 8.6 and 8.7 and identify 'vehicles audible from a distance' as the recurring source of noise identified during both daytime and night time monitoring. Noise monitoring results were within the EPA 'Typical Limit Values for Noise from Licenced Sites' (NG4 2016)

In order to minimise the impact on the nearest noise sensitive receptors from traffic noise at this facility, it is 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**

Chapter 9.3 'Existing Environment – Odour Survey' states that a walk over sniff test odour survey was undertaken in October 2016 and February 2017. An ammonia odour was detectable within the poultry houses but not outside or in the vicinity of the nearest occupied dwelling.

The odour assessment predicts that there will be no significant impact on the health of the local community as a result of odour from the facility and that odours are unlikely to be detected beyond the site boundary.

The Environmental Health Service recommends that the mitigation measures proposed in Chapter 9.6 '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 licence application

- Certification is provided to ensure the integrity of the lining of the private on-site well
- Monitoring of the well is undertaken twice per year.
- The mitigation measures referred to in Chapter 7.52 Operational Phase of the EIAR are included as conditions of the licence in order to minimise the risk to both water quality in the vicinity of the poultry growing facility and to public health.
- High level monitors are fitted to soiled water storage tanks and that tank integrity testing is undertaken on an annual basis
- The applicant shall be requested to conform with the legal provision of article 23 (4) of S.L 31 of 2014 and provide information to the EPA detailing the quantity and location of land spreading
- Poultry litter is not removed during periods of heavy rain.
- High level monitors are fitted to soiled water storage tanks and that tank integrity testing is undertaken on an annual basis
- 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.
- Odour mitigation measures specified in 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

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