

Submission

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| Submitter: | Miss Claire O'Dwyer |
| Organisation Name: | HSE EHS |
| Submission Title: | P1139-01 |
| Submission Reference No.: | S009881 |
| Submission Received: | 18 January 2021 |

Application

| | |
|------------|-----------------------|
| Applicant: | Cecil and Lily Clarke |
| Reg. No.: | P1139-01 |

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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Tel: 049 4373418
Fax: 049 4373427

Date: 15th January 2021

Our reference: 1487

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

EPA reference: P1139-01

Type of Consultation: Industrial Emissions

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Applicant: Cecil and Lily Clarke, Corraghbrack, Monaghan, Monaghan

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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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 | No | Intensive Agriculture | The rearing of poultry in installations, whether within the same complex or within 100 metres of the same complex, where the capacity exceeds 40,000 places. |
| 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 December 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 proposed development is located approximately c. 6.5 km North of the town of Monaghan, and c. 4.8 km South of the village of Emyvale, Co. Monaghan. The development is accessed by an existing agricultural entrance which connects to a local road. The site of the proposed development is within and existing farmyard area. There is a low density housing with minimal development in the general area. The proposed development is located approximately 54m from the nearest third party dwelling.

Water Supply:

The water supply on the farm will be from an existing group water scheme. It is proposed to supply the development with water from a new deep bore well located in close proximity to the development in the future.

The Geological Survey of Ireland has classified the aquifer as locally important with a vulnerability rating of high.

All surface/roof water will be diverted through a polishing filter prior to final discharge to groundwater which in turn may feed into this drain given its position, downhill of the proposed development.

The EIAR concludes that taken into consideration along with the adequate soil cover, setback from the peat areas, sound concrete foundations, strict monitoring of the operation at all stages and the unlikelihood of point or diffuse source of pollution from the development, no adverse effect to local groundwater/aquatic environment or local water amenity value is envisaged.

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 and stored in a precast underground storage tank, 8,029 gallon (36.5 m3) capacity at the end of each house. The proposed washings tanks will be precast concrete factory produced and not block built on site.

The EIAR states that all land spreading activities will be carried out in accordance with the relevant directives and guidelines, especially the Department of Environment's Code of Practice for Farming. The developer will thus avoid spreading activities during prolonged wet spells and frost while also paying particular attention to recommended buffer zones. Surface water runoff arising from the development will be diverted to the proposed surface water drainage network via the gravel based soil polishing filter.

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 *inter alia* 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 Corraghbrack Stream is located 90m to the west is the closest surface waterbody to the site. This stream flows in a general northern direction where it merges with the Killygavna Stream approx. 1.25km downstream from the site. These headwaters flow into the Mountain Water approx. 2.7km to north east. Sheetrim Lough, located 1km to the south, is the closest surface waterbody located within the Blackwater River catchment.

The appropriate assessment screening report in the EIAR states that there will be no emissions of soiled water from the site. All soiled water will be disposed of in accordance with the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017 S.I. No. 605 of 2017.

All surface/roof water will be diverted through a polishing filter prior to final discharge to groundwater. The EHS welcomes the quarterly monitoring of the storm water outflow. The EIAR states that these samples will be tested at an independent laboratory; the records of which will be retained on-site and included in the Annual Environmental Report.

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 EIAR states that all the poultry manure from the farm will be removed off site by an authorised contractor, Coulson Haulage, Co. Monaghan for compositing.

A fertiliser plan has been submitted as part of the EIAR however no information has been provided in the plan. The estimated manure production upon completion of the proposed development should be calculated in order to adequately manage manure.

Waste:

The EIAR states that a twice-daily inspection will be carried out within the poultry house to remove the carcasses of any dead birds. These will be removed from the area inhabited by flock to a storage container (wheelie bin of 240 litre capacity), there will be two bins commissioned for each of the new houses. These containers will be emptied by Michael Galligan, Gortnaleck, Ballyconnell, Co. Cavan approximately every two weeks.

It is recommended that the applicant ensure that there is adequate storage for dead birds 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 the nearest third party dwelling is 54m 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 10(2) 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 EHS also welcomes the odour complaints procedure outlined in the EIAR where it states that where complaints are received, a follow-up investigation will be initiated. This will be initiated as soon as feasible and all results made available to the Local Authority and EPA for inspection. In the event of Odour nuisance an investigation following the EPA Air Guidance on Odour Assessment (AM) will be initiated

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

Section 3.7.2 States that there is no proposed monitoring for odour at the proposed development. Due to the close proximity of the third party dwelling to the proposed development the EHS recommends that the applicant be advised to monitor odour from the installation on a continuous basis. 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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