



Submission

Submitter:	Miss Claire O'Dwyer
Organisation Name:	Environmental Health Service
Submission Title:	P1142-01
Submission Reference No.:	S009926
Submission Received:	15 March 2021

Application

Applicant:	Laragh House Farms Limited
Reg. No.:	P1142-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Date: 5th March 2021

Our reference: 1572

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

EPA reference: P1142-01

Type of Consultation: Industrial Emissions

Applicant: Laragh House Farms Limited, Kilcrone, Stradone, Cavan

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 2nd February 2021

- 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 in a rural location and the land-use surrounding is predominantly agricultural. Access to the proposed new development will be via a new access road to the site. The topography of the area is undulating. The nearest residential property to the proposed development is >150m. The applicant currently operates an existing poultry farm on site.

Water Supply:

The Geological Survey of Ireland has classified the aquifer as poor with a vulnerability classifications as 'H - High' or 'E - Extreme' vulnerability.

The EIAR has stated that adverse effect on ground water from the proposed development will not pose a significant risk to the underlying groundwater, as there will be no process discharge to ground.

The mitigation measures are outlined in section 5.4

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.

No information has been provided on the water supply to the proposed development, as a result the EHS cannot fully assess the potential impacts on drinking water.

Soiled Water:

The EIAR states that soiled water from the proposed development will be collected a 18cu.m. waste water storage tank that will be positioned at the front of each house to collect all soiled waters generated during the washing process. The EIAR also states that an estimated 930m³ of soiled water will be generated onsite per annum. Given a soiled water nitrogen (N) content of 1 kg Organic N/m³, 930m³ of soiled water applied to the available 48.69ha equates to an additional organic N loading to those lands of 25.9kg Organic N/ha. Consequently, this will result in an increase in N loading to 169kg Organic N/ha. This loading is lower than the 170kg Organic N/ha limit stipulated in the Nitrogen Regulations. The soiled water will then be applied to farmland in line with S.I. 605 of 2017, as amended.

All organic manure generated on-site will be removed off site by a registered and approved contractor for the transport of poultry manure. The applicant has an agreement in place with CLR Co-op Ltd. to fulfil this duty. The manure will be removed at the end of each batch/growing cycle approximately every 6/7 weeks.

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 EIAR states that the closest hydrological feature to the site is the Laragh Stream, which is a tributary of the River Annalee, approximately 7km from the site.

The EIAR states that there will be no effluent/process discharge to any surface waterbody and as such it is not envisaged that operation activities will pose a significant risk to the Laragh stream. The EIAR identifies the two main operation impacts as;

- Accidental spillage of diesel fuel and hydraulic oil from site machinery leading to migration of pollutants via surface water flow and subsequent contamination of Laragh Stream;
- Over application of organic manure and soiled water to farming lands leading to migration of nutrients via surface water flow and subsequent eutrophication of Laragh Stream and relevant surface water bodies adjacent to lands receiving soiled water inputs.

The EIAR also states that a permanent silt trap will be installed and maintained at a location upgradient to the stormwater discharge point and that there will be daily inspection of stormwater discharge point with additional surface water quality sampling in accordance with any EPA IED licence requirements. The mitigation measures to prevent discharge into surface water bodies are outlined in section 6.3 of the EIAR.

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 organic manure generated on-site will be removed off site by a registered and approved contractor for the transport of poultry manure. The applicant has an agreement in place with CLR Co-op Ltd. to fulfil this duty. It is estimated that 2729.03m³ of manure will be produced onsite per annum (i.e. 0.39m³ per bird x 143,000 x 52 weeks = 2900.04m³)

The Applicant shall be requested to conform to the legal provision of article 23 (4) of S.L 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 permission granted that all such information is provided to Monaghan County Council well in advance of any manure transportation so that potential landbanks can be risk assessed and evaluated for suitability

Waste:

The EIAR states that all dead birds will be stored in sealed and locked contained prior to disposal and removed offsite by Michael Galligan, Gortnaleck, Ballyconnell, CO Cavan when required.

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:

There are no sensitive locations in close proximity to the proposed development so as to be adversely impacted by gaseous emissions. The EIAR states that there are no third party dwellings located within >150 metres 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 9.3 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 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.

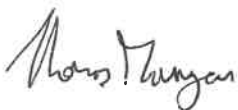
Pest Control:

The EIAR states that a rodent control programme will be implemented but no further details are provided.

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