

Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission
Submission Reference No.:	S009954
Submission Received:	09 April 2021

Application

Applicant:	Mr. Seamus Noonan
Reg. No.:	P1144-01

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

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

Date: 9 April 2021

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

Re: Industrial Emissions Licence Application Reference: P1144-01

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

Name and Address of applicant: Mr Seamus Noonan, Ballyduhig, Broadford, 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



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: 9 April 2021

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

Our reference: EHIS 1604

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

EPA Reference: P1144-01

Type of Consultation: Industrial Emissions Licence

Applicant: Mr Seamus Noonan, Ballyduhig, Broadford, 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 17 February 2021

- 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 Seamus Noonan has applied for an Industrial Emissions Licence (P1144-01) for his poultry growing operation at Ballyduhig, Braodford, Co. Limerick. Mr Noonan received planning permission from Limerick City and County Council for the construction of two poultry houses on 5 January 2017

(Planning Reference 16/541) and currently operates a poultry growing facility from an existing single poultry house at his facility at Ballyduhig.

Mr Noonan is applying for a licence to operate a broiler farm with a maximum stocking number of 80,000 birds. There is currently one operational poultry house on site and on completion of the second house the total site capacity of the proposed development will be approximately 64,000 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.

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 a fifty two day 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. 35 to 52 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 Noonan's existing poultry rearing 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 15 March 2021 to assist in the preparation of this report. It was noted that the site and facilities were 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 Seamus Noonan's poultry growing facility is located Ballyduhig, Broadford, Co. Limerick and is approximately 10km south of Newcastlewest and approximately 44km south west of Limerick city. The facility is located 1100m south from the local road L1318. The total area of the site including the existing poultry house and dairy farm is 5 hectares.

Agriculture is the predominant activity in the locality which is very 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 Noonan resides on the farm in a two storey dwelling which is located approximately 150m north west of the site. There are two neighbouring properties in the vicinity - one located approximately 330m to the north of the proposed facility and the second located approximately 300m to the east of the facility.

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

- **Surface and Ground water**

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

Chapter 9.4.1 'Pollutants and Waste' outlines the processes in place for the protection of ground and surface water. All fuels and chemicals kept on site will be stored in bunded containers and refuelling will be undertaken off site.

There is a small drainage ditch on site which drains the site and surrounding agricultural lands. The flow in this drainage ditch will be increased as a result of the proposed development. Rain water which would have previously percolated into the ground will now be directed from the yard and houses into the drainage ditch.

Two storm water drainage points are specified in '7.7 Discharges to Storm Water – Attachment' and are diverted to two storm water monitoring points before being discharged to the drainage ditch.

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 a soiled water storage tanks prior to its application to farmland as fertiliser.

Chapter 10.3.3.4 'Groundwater Usage' of the EIAR states that residential properties on and around the site are connected to the local public water supply. The water supply for the facility is supplied from a private well located within the site boundary.

The Environmental Health Service (EHS) further recommends that the onsite well should not be used as a potable water supply for the applicant's residence.

- **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 is one soiled water storage tank, with a capacity of 7,500 gallons serving a total maximum capacity of 80,000 birds.

It is recommended that details are provided as to the number of times per annum that the washwater storage tank is emptied. This is in order to ensure that the tank has the capacity to cater for the anticipated quantity of washwater produced annually.

It is also recommended 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.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 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 323.75 tonnes of poultry manure is currently generated on the poultry growing operation and that this is expected to increase to 650-700 tonnes when the additional poultry house is operational. The litter is removed by MJ Kehoe Transport Ltd following cleaning out of the houses. Form 7.6.2 (a)' Landspreading Controls (Agri) Attachment' indicates that the manure will be used for mushroom compost production and for landspreading as a fertiliser.

The Environmental Health Service recommends that details are provided of the mushroom compost facility receiving the manure and of the address of the land banks to be used for the spreading of manure.

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 8.5 tonnes of poultry tissue waste will be generated annually and that carcasses will be stored in sealed skips on site prior to removal by a licenced contractor.

- **Noise**

Chapter 6 'Noise' states that a baseline noise survey has been undertaken with background noise levels recorded at four noise monitoring locations, including at the site of the nearest sensitive receptor in May 2016.

The area in which the poultry growing facility is located is rural in nature with the nearest third party residence located approximately 300m to the east. The noise environment in the location is described as 'relatively low'.

The results of the noise monitoring baseline survey are detailed in Table 6.2 and identify 'vehicles audible from a distance, cars passing and sound from milking parlour' as the recurring source of noise identified during daytime 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 5 'Air Quality and Climate' states that an Odour Management Plan is in place for Mr Noonan's poultry growing facility.

This chapter outlines the mitigation measures proposed for the management of odour generated by the facility. It concludes 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 5.5.2 'Mitigation Measures - Odour' 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

- The onsite well should not be used as a potable water supply for the applicant's residence.
- Details are provided as to the number of times per annum that the washwater storage tank is emptied. This is in order to ensure that the tank has the capacity to cater for the anticipated quantity of washwater produced annually.
- 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 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."
- Details should be provided of the mushroom compost facility receiving the manure and of the address of the land banks to be used for the spreading of manure
- 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.
- Mitigation measures proposed in Chapter 5.5.2 'Mitigation Measures - Odour' of the EAIR should be incorporated into the conditions of the licence

Seamus Kenny

Seamus Kenny
Environmental Health Officer,
Health Service Executive,
Newcastle West Health Centre,
Gortboy,
Newcastle West,
Co Limerick,

Caroline Hueston

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

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