

### Submission

Submitter:	Thomas Mangan
Organisation Name:	HSE
Submission Title:	Submission
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### Application

Applicant:	Mr. Stephen Moffett
Reg. No.:	P1154-01

See below for Submission details.

Attachments are displayed on the following page(s).

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An tOifig Náisiúnta um Sláinte Chomhshaoil  
Feidhmeannacht na Seirbhíse Sláinte,  
Urlár 2, Teach na Darach, Ascaill na Teile  
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services  
2nd Floor, Oak House, Lime Tree Avenue  
Millennium Park, Naas, Co. Kildare  
Eircode: W91KDC2

T: 045 880 442

[ehnationaloffice@hse.ie](mailto:ehnationaloffice@hse.ie)

**Date:** 11/06/2021

**Our reference:** 1767

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

**EPA reference:** P1154-01

**Type of Consultation:** Industrial Emissions

**Applicant:** Mr. Stephen Moffett, Corlea, A75 EK26, Ballybay, 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 30<sup>th</sup> April 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 application site is located adjacent to the applicant's existing poultry enterprise and encompasses a total area of 1.271ha.

The proposed development location is bordered by agricultural grassland to the north and east with the applicant's family's bovine farmyard complex situated directly to the west. A local road (L7310) runs adjacent to the site's southern boundary. The closest residence to the site is that of the applicants and applicant's family, with no other residential or commercial buildings located within a 100m radius of the development.

## Water Supply:

The Geological Survey of Ireland has classified the aquifer to the site and the surrounding area as a good, with a vulnerability rating of extreme.

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 EHS welcomes the information on local ground water supplies in the area. The applicant consulted the Geological Survey of Ireland (GSI) well database ([www.gsi.ie](http://www.gsi.ie)) and identified the closest well to the site being within the neighbouring townland of Terrygeely. In addition, the EIAR states that following inspection of the Ordnance Survey of Ireland (OSI) 25" historical mapping and OSI Cassini 6" mapping, no other springs or wells were identified within the vicinity of the site.

The EHS acknowledges the EIAR statement that it is not anticipated that the development will impact upon the 'Terrygeely' well, given the relatively short flow paths that are generally exhibited within poor groundwater aquifers.

**In addition to consulting the GSI well database 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 soiled water emanating from both the existing poultry unit and proposed unit during the wash down phase of operations will be captured by a sump / grated channels and piped directly to the existing 36.5m<sup>3</sup> wash water tank located to the front of the new poultry unit.

A total soiled water volume of 20.8m<sup>3</sup> will be generated per batch, upon completion of the proposed development. This soiled water will then be applied to farmland in accordance with the Nitrates Regulations.

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, where applicable, 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 updated and issued to the Agency for approval on an annual basis.

#### **Storm/Surface Water:**

The proposed development site is located within the Lough Neagh and Lower Bann Hydrometric Area and WFD Catchment. Additionally, the site is located within the Clontibret Stream Sub-catchment. The Aghnaclogh Stream which is located approx. 160m to the east, is the closest watercourse to the proposed development site. Another watercourse the Toniscoffey Stream, is located approx. 500m to the north of the site.

The predicted impacts from the proposed development during the operation phase are outlined in section 5.3.2. The EHS are satisfied that once all the mitigation measures outlined in section 5.4 are fully implemented the impact on surface water will be low.

**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 total manure production upon completion of the proposed development will be c. 1,014 tonnes /annum. The EIAR states that all the poultry manure from the farm will be removed off site by an authorised contractor, George Coulson & Sons Ltd.

**The Applicant shall be requested to conform to 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 slurry transportation so that potential landbanks can be risk assessed and evaluated for suitability.**

#### **Waste:**

The EIAR states that a regular inspection will be carried out within the poultry house to remove the carcasses of any dead birds. Any dead birds will be accumulated in a sealed leak proof container on site for collection by Collagen Proteins at 1 - 2 week intervals for transport to an authorised Animal By-products facility at Nobber, Co. Meath.

**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 is no third-party dwelling located within 100m 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 8.3 of the EIAR outlines mitigation measures 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.

**EHS advises that an assessment of the impact of odour emissions from the activity and the impact of odour emissions on local residents should be carried out. The EPA's published report entitled Odour Impacts and Odour Emission Control Measures for Intensive Agriculture should be referenced.**

**The EHS also recommends that the 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:**

Section 6.3 of the EIAR states that a rodent control programme will be implemented. The programme as implemented on site should 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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