

### Submission

Submitter:	Mr Tom Managn
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission
Submission Reference No.:	S010061
Submission Received:	09 July 2021

### Application

Applicant:	Silver Hill Foods Unlimited Company
Reg. No.:	P0422-04

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

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**Date:** 8<sup>th</sup> July 2021

**Our reference:** 1782

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

**EPA reference:** P0422-04

**Type of Consultation:** Industrial Emissions

**Applicant:** Silver Hill Foods Unlimited Company, Hillcrest, Emyvale, 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
7.4.1	No	Food and Drink	The operation of slaughterhouses with a carcass production capacity greater than 50 tonnes per day.
7.7.2	No	Food and Drink	The processing (including rendering) of animal carcasses and by-products, not included in paragraph 7.7.1.
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 5<sup>th</sup> May 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 located just north of Emyvale, Co. Monaghan. The site as a whole, including auxiliary lands and infrastructure, encompasses approximately 35 hectares and is accessed by the N2 - the Dublin to Derry road. The site is set over a number of levels with the main processing and facilities area on the higher part off the site at an elevation of approximately 70m Above Ordnance Datum (AOD) and the lower part of the site encompassing the waste water treatment plant (WWTP) and environmental management area at c 60m AOD.

The plant is normally only operated on weekdays, i.e. Monday – Friday. However, if necessary due to demand, processing may be undertaken at weekends. The facility employs approximately 180 people with 130 involved in processing. Normal hours of operation are 06:00hrs to 00:30hrs.

### **Noise:**

The EHS (Environmental Health Service) have assessed chapter 5 which looks at Noise.

Section 5.3 of the EIAR assess the Noise baseline conditions. 4 noise sensitive locations are identified which are outlined in section 5.3.3, and the results for each of these NSL are shown and discussed in section 5.3.10.

**Having assessed the potential noise impacts on the surrounding environment and having regard for the noise survey carried out, the EHS are satisfied that once the mitigation measures outlined in section 5.6 are fully implemented the noise impact from the continued operation of the facility will not be significant.**

### **Soils and Geology:**

The EHS have assessed chapter 6 which looks at soils and geology.

The current facility discharges their treated effluent into the Corlattalan stream. The EPA have advised that due to the Corlattalan stream coming under increased pressure, they needed to find a new way to dispose of their effluent. Irish Water have confirmed recently that they will take up to 230 m3 day of treated effluent to their WWTP in Emyvale, the balance would have to be disposed of by site.

The proposal is to use a drip irrigation system covering an area of c14.6 ha. A pilot will be undertaken first and it will disperse ca. 48 m3 per day. The Flynn and Shaw percolation report of 2016, is included in Appendix 6.2. In addition a Tier 2 risk assessment (with a Conceptual Site Model CSM) was undertaken as part of Geosyntec Consultants Hydrogeological Survey of the site for the drip irrigation system which can be found in appendix 6.1. It concluded that it is expected that the indirect discharge of effluent from the proposed drip irrigation system will be compliant with the Groundwater Regulations.

Sections 6.5.1 and 6.5.2 outline the mitigation measures to be employed to protect soil and geology during both the construction phase and operational phase.

**The EHS is satisfied that once all the mitigation measures outlined in the EIAR are implemented that the overall impact on soils and geology will be neutral.**

### **Hydrology (Flood Risk), Surface Water and Hydrogeology:**

The EHS have assessed chapter 7 which looks at Hydrology (Flood Risk), Surface Water and Hydrogeology.

There are 3 groundwater abstraction wells in the vicinity of the site which supply water for the licenced activities, AGW1, AGW2 and AGW3. The current water usage at the facility is approximately 1500 - 2300m<sup>3</sup> /week based on a 5 day operating week. It is considered that the overall water requirements for the facility increase in the coming years when the new processing factory is completed. No water comes from the public supply and it will continue to be supplied from the current source. Groundwater from source is sampled Biannually. Table 7.3 show the ground water lab results for 2020.

The EIAR stats that there are a number of other wells, generally for domestic and private use, on the GSI's well records within a 1km radius of the site, however, none of these are located down-gradient (south-east) of the site. Table 7.2 presents a summary of the groundwater wells included in the GSI well search.

**The EHS welcomes the consultation the GSI well database. However as is pointed out in the EIAR 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.) the applicant should carry out a door to door well survey of dwellings in close proximity (300m of site boundary) 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.**

Sections 7.5.1 and 7.5.2 outline the mitigation measures to be employed to protect hydrology and water quality during both the construction phase and operational phase.

**The EHS is satisfied that once all the mitigation measures outlined in the EIAR are implemented that the overall impact on soils and geology will be neutral.**

### **Air Quality and Climate Factors:**

The EHS have assessed chapter 8 which looks at Air Quality and Climate Factors.

The main area of concern is odour emissions from the proposed Pet Food plant. The EIAR conducted a preliminary odour dispersion modelling assessment. The results of the dispersion modelling of cooking odours is presented in Figure 8.2 of the EIAR, they demonstrate that the predicted levels of odour comply with the odour exposure criterion.

**Due to the close proximity of the third party residential dwelling located approximately 130m northwest of the proposed development the EHS recommends that the applicant be advised to monitor odour from the installation on a continuous basis. 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.**

Sections 7.5.1 and 7.5.2 outline the mitigation measures to be employed to protect hydrology and water quality during both the construction phase and operational phase.

**The EHS is satisfied that once all the mitigation measures outlined in the EIAR are implemented that the overall impact on soils and geology will be neutral.**

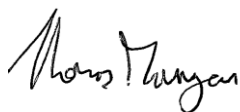
**Waste Management:**

The EIAR states that "The manure produced by the ducks on the offsite supplier farms is removed by licensed hauliers and is used as organic fertiliser by farmers off site – typically under Nutrient Management Plans (NMP) which are prepared to comply with the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2017 (S.I. No. 605 of 2017)."

**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.**

**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