



Submission

Submitter:	Miss Siobhan Murphy
Organisation Name:	HSE
Submission Title:	HSE Submission 0447-02 EHS1841
Submission Reference No.:	S010076
Submission Received:	12 August 2021

Application

Applicant:	Ashleigh Farms (Waterford) Limited
Reg. No.:	P0447-02

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 Department,
HSE South - Waterford
Waterford Community Services,
Cork Road
Waterford.

Tel: 051 842957

Date: 10 August 2021

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

Re: Industrial Emissions Licence Application Reference:
P0447-02

Applicant: Ashleigh Farms (Waterford) Limited,
Ballinameela, Cappagh,
Dungarvan, Co. Waterford

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 Ms. Siobhán Murphy, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully,

Siobhán Murphy
Principal Environmental Health Officer

Date: 11 August 2021

Our reference: EHIS 1841

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

EPA Reference: P0447-02

Type of Consultation: Industrial Emissions

Applicant: Ashleigh Farms (Waterford) Limited, Ballinameela, Cappagh, Dungarvan,
Co. Waterford

Nature of Activity: The rearing of pigs in an installation where the capacity exceeds (b) 2000 places for production pigs which are each over 30kg

Introduction

The following HSE departments were notified of the consultation request for the licence review application on 2 July 2021

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Helen Mulcahy
- CHO – Kate Killeen White

This report only comments on Environmental Health impacts of the licence application.

General

Ashleigh Farms has applied for an Industrial Emissions Licence for their facility in Cappagh, Dungarvan, Co. Waterford, which has been in operation since the early 1980s. The licence application is being made as it is proposed to increase the number of stock at the facility; amend the site boundary; add a new class of activity to regularise a recently installed anaerobic digestion unit and to provide for the approval of a planned fallen animal unit onsite.

The facility falling under Class 6.2 of the First Schedule of the EPA Act 1992 *‘the rearing of pigs in an installation where the capacity exceeds –*

(b) 2000 places for production which are each over 30kg’

The regularising of the operation of the anaerobic digestion unit and the establishing of a fallen animal incinerator onsite are secondary activities which would come within EPA Activity Class 11

'the recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which licence under the said Part is or will be required'

The Non-Technical Summary accompanying the licence states that the facility operations include artificial insemination, birthing of litters, weaning and fattening of pigs. Table 3.1 'Stock numbers at Ashleigh Farms Ballinameela Pig Unit' indicates that the current number of pigs on site totals 11810.

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 the existing Ashleigh Farm pig production 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
- Pest Control
- Waste

Ms Siobhan Murphy, Principal Environmental Health Officer, visited the locality in which the pig production facility is based on 26 July 2021 to assist in the preparation of this report.

Any potential contamination of surface or ground water

a) The site is located in a rural, predominately agricultural area. It is accessed by a narrow access road which is in good condition.

b) The main emission from the site is and will continue to be from slurry waste and the inherent threat of surface water pollution. Some wastes may contain metals such as copper which must be considered in developing nutrient management plans.

c) This is a non-bedded unit, slurry dry matter is expected to be between 5-10%

d) As indicated in Attachment 7.6.2 (a) Landspreading Controls the quantity of slurry produced per year is 19000m³. As the current maximum storage capacity at the site is reported as 15562.68m³ this provides sufficient storage capacity for six months.

e) The nearest watercourse is the River Brickey which is located 560m south of the site with the River Finisk located just over 1km to the north west of the facility

f) The site is served by three onsite groundwater wells. Microbiological monitoring of the groundwater wells was undertaken in August 2020 and results indicated 'no bacteriological impact on groundwater at the site'.

g) It is noted that there is no run off of surface water from the access roads and that all rainwater will percolate through stone chippings. Clean surface water run - off from buildings, sheds and the surrounding yard flows to a storm water discharge point which is located to the south of the site buildings.

If it is proposed to use any groundwater well as a potable water supply for staff or domestic use, the water quality must comply with S.I. No. 278 of 2007 E.C (Drinking Water) Regulations 2007 and routine monitoring must be undertaken as evidence of compliance.

Emissions to air including odour and noise

Attachment 7.4.1 'Emissions to Atmosphere – Main' indicates that the boiler and the proposed fallen animal incinerator are the main anticipated emission to atmosphere sources.

The Environmental Health Service recommends that fallen animals are incinerated as soon as possible and if short term storage is required prior to incineration storage details (length of time, storage container and storage conditions) must be specified as a condition of the licence.

The incinerator must be constructed to cater for the anticipated moisture content (including fats and oils) of pig carcasses and must be leak proof. Integrity testing and maintenance must be undertaken annually

The Environmental Health Service recommends that an odour monitoring programme is implemented to ensure that fugitive odours cannot be detected at the boundary of the plant.

It is noted that there is 'a central open slurry storage tank' at the facility and it is recommended that this unit is secured and that minimal agitation of the slurry contained in this tank is undertaken.

It is recommended that the slurry storage tank is covered or enclosed in order to reduce odours and prevent rainwater ingress and the potential for flooding.

Ventilation must be provided to all sheds to avoid the build- up of odours

It is noted that the management of the pig diet protein levels is included as an odour management measure. Feeding pigs a low protein diet to reduce odour from slurry is in accordance with recommendations included in the EPA's 'Odour Impacts and Odour Emission Control Measures for Intensive Agriculture' report (EPA 2001)

The Environmental Health Service (EHS) notes that there is limited information contained in the Licence Application on the potentially significant impacts of fugitive odours from the facility. The EHS was unable to locate any baseline odour monitoring at the nearest sensitive locations, or that any atmospheric dispersion modelling had been undertaken or considered.

It is recommended that odour from the facility is monitored to ensure that the mitigation measures listed above are effective and that a nuisance is not created.

The EHS notes that EPA Application Form 7.5 'Noise Emissions' has not been included with the application and recommends that noise emissions from the facility (including from animals, plant and machinery, vents and traffic) is assessed and that limits are specified in the licence

Pest Control

The Environmental Health Service was unable to identify any reference that a Pest Control Plan or Contract is in place for the external site areas and for the animal housing sheds. The control of pests on site is essential as rodents can consume and contaminate feed and can play a role in the transmission of disease.

Pest Control measures should include good hygiene practices within the facility and routine checks to ensure that the shed structures are rodent proof.

It is recommended that a Pest Control Plan is drawn up for the facility in its entirety, which specifies

- **Frequency of pest control monitoring**
- **Rodenticides used**
- **Rodent activity noted**
- **Remedial action undertaken**

The Visit Sheets completed by the Pest Control company following site visits should also be included in this Plan.

Waste

Waste generated on site will include

- **Veterinary waste**
- **Fallen animals**
- **General domestic waste from the administration office, stores and equipment maintenance**
- **Slurry from the operation of the facility**

The site is not connected to a mains sewer and wastewater from the site welfare facilities discharges to an on-site septic tank. The Environmental Health Service recommends that the integrity of this tank is checked annually and that it is emptied a maximum of every five years.

Landspreading from the site will have a cumulative effect. Each farm accepting slurry will have to take account of the nature of their own soils and the water table levels on their farms so as to minimise the impact of landspreading on the local environment.

The Environmental Health Service recommends that the applicant is 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 licence granted that all such information is provided to the EPA as a condition of the granting of the licence so that potential landbanks can be risk assessed and evaluated for suitability

Organic wastes, by their nature contain high concentrations of the nutrients nitrogen (N), phosphorus (P) and potassium (K). Wastes such as manures and slurries from piggeries are likely to contain faecal bacteria, viruses, protozoa (e.g. Cryptosporidium) and helminthic parasites. Some wastes may also contain metals such as copper which must be considered in developing nutrient management plans. This is a non-bedded unit and slurry dry matter is expected to be between 5-10%. The expected output for nitrogen is calculated by formula.

The Environmental Health Service recommends that routine microbiological and chemical analysis of the slurry should be undertaken a minimum of once every six months and also if general feeding or creep feeding practices/products change.

A list of 27 farms with a total import capacity of 286,888m³ is included in Attachment 7.6.2 (a).

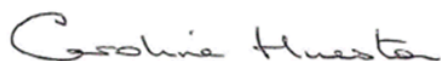
The Environmental Health Service recommends that farmers exporting slurry from Ashleigh Farm facility to use for land spreading are made aware of and comply with the best practice measures contained in Chapter 4.10 'Waste' of the Non-Technical Summary.

It is further recommended that a condition of the licence should be compliance with land spreading requirements as specified in the Nitrates Directive (91/676/EEC) and the National Nitrates Action Programmes (NAP)

The Environmental Health Service notes that it is stated in Chapter 3.2 of the Non- Technical Summary that 'there is currently no Environmental Management System (EMS) in place at the site' and recommends that an Environmental Management System is put in place as a matter of priority



Siobhan Murphy
Principal Environmental Health Officer
Local Health Office, Cork Road, Waterford



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

HSE South Emergency Management Consultation Report			
Report to	Siobhan Murphy, PEHO, Waterford	Date	5th July, 2021
Type of consultation: EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
Other: Industrial Emissions (IE)			
Authority	Waterford City & County Council		
Reference Number	EHIS Ref. No. 1841 EPA Ref. No. P0447-02		
EM Reference Number	EMENV086		
Applicant (Consultants)	Ashleigh Farms (Waterford) Limited, Ballinameela, Cappagh, Dungarvan, Waterford		
Proposal	The rearing of pigs in an installation where the capacity exceeds 750 places for sows		

HSE South Emergency Management Observations:

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the `ETHANE` format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e., a green sign with a yellow border and white lettering citing the abbreviation RVP.
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the `off-site` impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*. <https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or maryanne.horgan@hse.ie



Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance Service and / or Fire and Rescue Service

WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

<u>GIVE THE FOLLOWING INFORMATION</u>	
This is: _____ Eircode _____ (Name, Telephone Number and Eircode Address of site)	
<i>An incident has occurred at this site - standby for ETHANE message</i>	
E	
	Exact location of the incident
T	
	Type of incident, e.g.: fire, explosion, gas leak, etc
H	
	Hazards – current and potential
A	
	Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)
N	
	Number of casualties and their condition – specify adult / children if known
E	
	The emergency services present and required
<i>N.B. If you require another emergency service stay on the line and repeat the steps again</i>	

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No.1