



Submission


Submitter:	Mr Andrew Curtin
Organisation Name:	HSE
Submission Title:	HSE Submission
Submission Reference No.:	S010312
Submission Received:	12 May 2022

Application

Applicant:	Mr. Jerry McAuliffe
Reg. No.:	P1179-01

See below for Submission details.

Attachments are displayed on the following page(s).

	<p>Environmental Health Service Health Service Executive West Ashbourne Hall Ashbourne Business Park Limerick V94 NPEO T:00353 (0)61 461502 / 04 / 05</p>
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Date: 12 May 2022

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

Re: Industrial Emissions Licence Application Reference:
P1179-01

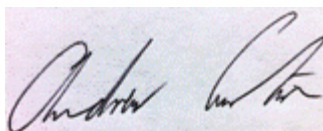
Proposed development The rearing of poultry in installations where the
capacity Exceeds 40,000 places

Name and Address of applicant: Mr Jerry McAuliffe, Appletown, Feohanagh, 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

Date: 12 May 2022

Our reference: EHIS 2329

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

EPA Reference: P1179-01

Type of Consultation: Industrial Emissions Licence

Applicant: Mr Jerry McAuliffe, Appletown, Feohanagh, 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 14 April 2022

- Emergency Planning – Kay Kennington
- Estates – Helen Maher/ Stephen Murphy
- Assistant National Director for Health Protection – National Director for Health Protection
- CHO – Maria Bridgeman

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

Mr Jerry McAuliffe has applied for an Industrial Emissions Licence (P1179-01) for his poultry growing operation at Appletown, Feohanagh, Co. Limerick. Mr McAuliffe received planning permission from Limerick City and County Council for the construction of two poultry houses on 12 April 2021 (Planning Reference 21/467) and currently operates a poultry growing business from an existing single poultry house at his facility at Appletown.

Mr McAuliffe is applying for a licence to operate a broiler farm with a maximum stocking number of 120,000 birds. There is currently one operational poultry house on site accommodating 40,000 birds and on completion the two additional units will have the potential to house an additional 40,000 birds each.

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 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 – 42 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 McAuliffe'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 dust, odour and noise

Ms Denise Ryan Environmental Health Officer visited the facility on 6 May 2022 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 Jerry McAuliffe's poultry growing facility is located Appletown, Feohanagh, Co. Limerick and is approximately 8.2km south east of Newcastle West and approximately 833m north west of Feohanagh village, which includes a garage, shop and forecourt. The facility is accessed via the R522 regional road between Newcastle West and Drumcollegher. The total area of the site is 0.98 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 predominately agricultural and are generally flat. The nearest property is owned by the applicant, Mr McAuliffe, and is located approximately 450m to the south west of the site. One property which is located 330m west of the proposed poultry houses is unoccupied and derelict. (Chapter 1.3 'Site and Surrounding Lands Development' EIA)

The facility is bound by a combination of hedgerows and fencing. Screening is provided by trees and the applicant will make every effort to further obscure the facility by planting further hedgerows, native trees and shrubs.

- **Surface and Ground water**

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

Chapter 4.6.3 'Results' (Flora and Fauna) states that *'the basic screening process identified that there is potential for the development and its operations to impact on local surface waters as the local River Deel lies c.800m north of the site location and a dyke located immediately to the south of the proposed development into which the storm water off the site is piped for discharge into the River Deel'*

Chapter 5.0 'Effect on Groundwater and Surface Water' outlines the processes and structures in place for the protection of ground and surface water. All fuels, oils and chemicals kept on site will be stored in bunded containers and *'all diesel tanks must have adequate spill proof dispensing operations to protect surface water amenity proximate to the site'*. (Chapter 5.1.5 Mitigation Measures)

The only discharge from the site to surface waters will be the discharge of rainwater from roofs and clean yards to a field drainage dyke immediately south of the proposed poultry houses towards the adjacent River Deel.

The EIA states that *'there is no process discharge to groundwater'* (Chapter 5.0 'Effect on Groundwater and Surface Water')

Two storm water drainage points are specified in '7.7 Discharges to Storm Water – Attachment'.

Monitoring of storm water will be undertaken by means of weekly visual and 'sniff' testing.

Washings from the cleaning of the poultry houses are directed to wash water storage tanks from where they *'are vacuum tankered to available lands for land spreading'*. (Chapter 5.1 'Direct or accidental discharge of waste or washings')

Chapter 11.2 'The use of natural resources' of the EIA states that the planned poultry houses *'will have a definite requirement for a supply of water readily available from the local public water scheme during the construction stage and once completed there will be additional water used on the farm as a result of the proposed development'*. The applicant's property, the existing and proposed poultry houses and local residential properties are on the South West Regional Scheme.

The Environmental Health Service (EHS) recommends that the mitigation measures for the protection of surface and ground water which are referenced in Chapter 5.1.5 'Mitigation Measures' are included as conditions of the licence.

- **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 are two soiled water storage tanks – one existing and one proposed. **It is recommended that details are provided as to the number of times per annum that the washwater storage tanks are emptied.** This is in order to ensure that the tanks have 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 EHS 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 approximately 945 to 1260 tonnes of poultry manure will be generated in the facility. The poultry manure litter is removed by Keogh Haulage following cleaning out of the houses by Kelly's Bobcat Services.

The Environmental Health Service recommends that details are provided of the 'compost yards/recipient farmers' receiving the manure and of the address of the land banks to be used for the spreading of manure.

It is further recommended 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 25 tonnes of poultry tissue waste will be generated annually and that carcasses will be stored in sealed and covered storage bins on site prior to removal by a licenced contractor.

- **Noise**

The area in which the poultry growing facility is located is rural in nature with the nearest residence, which is owned by the applicant, located approximately 450m to the south west.

Chapter 11.11.3 'Potential Impacts and Mitigation Measures' contains a table which identifies potential noise sources as '*stock noise at feeding/moving/feed deliveries/manure removal*' with

mitigation measures listed as 'prioritise activities during working hours. Remote location: set back c.470m from the local regional R522 road'

The Environmental Health Service recommends that a programme for the inspection and maintenance (as required) of ventilation fans is put in place to minimise any potential impact of noise from the ventilation fans on sensitive receptors.

- **Dust and Odour**

Proposed dust mitigation measures during the construction of the poultry houses are intended to minimise the impact of dust on the local environment.

Chapter 4.2 'Effects on human beings' states that 'the proposed development is unlikely to generate or release sounds or odours that will significantly impair amenity beyond the site boundary' and that fugitive odours from the facility will be minimal and are most likely to occur when birds/manure are being delivered to the site.

The Table contained within Chapter 11.11.3 outlines the mitigation measures proposed for the management of odour generated by the facility. It concludes that, with adherence to the relevant Code of Practice when spreading wash water and operating within good management and housing standards, and adherence to mitigation measures 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 EHS recommends that all mitigation measures proposed in Chapter 11.11.3 'Potential Impacts and Mitigation Measures' 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

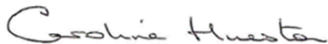
The Environmental Health Service makes the following recommendations in respect of this licence application

- The mitigation measures for the protection of surface and ground water which are referenced in Chapter 5.1.5 'Mitigation Measures' are included as conditions of the licence.
- That details are provided as to the number of times per annum that the washwater storage tanks are emptied
- Wash water storage tank integrity testing is undertaken on an annual basis.
- 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" and that details are provided of the 'compost yards/recipient farmers' receiving the manure and of the address of the land banks to be used for the spreading of manure.
- Poultry litter is not removed during periods of heavy rain

- That a programme for the inspection and maintenance (as required) of ventilation fans serving the existing and proposed poultry houses is put in place to minimise any potential impact of noise from the ventilation fans on sensitive receptors
- All odour mitigation measures proposed in Chapter 11.11.3 'Potential Impacts and Mitigation Measures' 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



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