



Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	HSE
Submission Title:	HSE Submission
Submission Reference No.:	S010325
Submission Received:	25 May 2022

Application

Applicant:	Ballyfaskin Enterprises Ltd
Reg. No.:	P0915-02

See below for Submission details.

Attachments are displayed on the following page(s).



Feidhmeannacht na Seirbhíse Sláinte

Health Service Executive

Environmental Health Service
Health Service Executive West
Ashbourne Hall
Ashbourne Business Park
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T: 00353 (0)61 461502 / 04 / 05

Seirbhíse Sláinte Comhshaoil
Halla Ashbourne
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Luimneach
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Date: 25 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: P0915-02

Name and address of applicant: Ballyfiskin Enterprises Ltd, Ballyfauskeen, Ballylanders,
Co. Limerick

EHIS reference: 2281

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: 25 May 2022

Our reference: EHIS 2281

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

EPA Reference: P0915-2

Type of Consultation: Industrial Emissions

Applicant: Ballyfaskin Enterprises Ltd., Ballyfauskeen, Ballylanders, Co. Limerick

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 23 March 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.

General

Ballyfaskin Enterprises Ltd has applied for an Industrial Emissions Licence for their facility in Ballyfauskeen, Ballylanders, Co. Limerick, which has been in operation since the 1970's. The existing facility comprises 17 buildings housing a 600 sow herd, mill building, rainwater harvesting tank and office building. Planning permission was granted with 16 conditions on 17 December 2020 for an increase in the capacity of the piggery from 600 sows to 1000 sows and the provision of an electrical substation. (Limerick City and Council Planning Reference 19/1135)

This licence application has been made as a result of the increase in capacity from 600 to 1000 sows at the Ballyfaskin Enterprises facility.

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 installation of an electrical substation on site which will allow for the upgrading of the electricity supply for the onsite feed mill.

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.

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 including potential contamination via slurry/soiled water production
- Emissions to air including odour and noise
- Pest Control
- Waste

Surface and Ground water including potential contamination via slurry/soiled water production

The Environmental Health Service (EHS) notes the following

- a) The site is located in a rural, predominately agricultural area. The access road is in good condition.
- b) The main emission from the site is and will continue to be from slurry waste which poses a potential threat to surface and ground water pollution.
- c) Fifteen public ground water supply sources have been identified in the vicinity of the area used for land-spreading. These are regarded as very high sensitive receptors.
- d) There are potentially a number of private wells attached to dwellings which have not been identified by the applicant
- e) As indicated in Attachment 7.6.2 (a) 'Land spreading Controls' the quantity of slurry currently produced is 15,681m³ per year. This is expected to increase to 15,805m³ when the proposed sow herd increases to 1000. There is 50 weeks slurry storage capacity on site which exceeds the minimum recommended storage capacity of six months.

It is recommended that the applicant is made aware that the following applies to all pig slurry and soiled water storage structures whether located on the site of the pig production facility or elsewhere:

- All construction work should be certified by a Chartered Engineer as having been completed in accordance with Section 100 or Section 123 (2015 and 2020 DAFM) as appropriate
- Where pig 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 fit for purpose and comparable to the Department of Agriculture, Food and the Marine specifications

- A Chartered Engineer should inspect all storage tanks and certify them as structurally sound for the purpose they were intended. Structural integrity testing of storage tanks should be undertaken on an annual basis.
- Leak proof facilities based on inspection chambers, perimeter wall and under floor drains should be provided and should be inspected on a regular basis, as specified in the licence. Due to the volume of slurry and the potential risk to public health from any contamination of a water supply as a result of a leak, the Environmental Health Service recommends that inspections are undertaken at 12-18 month intervals.

The Environmental Health Service recommends that the applicant is advised of Section 4.6 of 'Batneec Guidance Note for the Pig Production Sector – Spreading Pig Manure' and the conditions contained therein.

It is also recommended that high level monitors are installed in the proposed soiled water tanks in order to minimise the risk of unintentional overflow and that the applicant monitors and empties the soiled water storage tanks before they reach their capacity.

A Nutrient Management Plan should be maintained by the applicant to monitor nutrients on his lands, and is maintained for the management of soiled water resulting from onsite activities.

The Nutrient Management Plan should include:

- Calculation of the quantity of soiled water and the amount of nutrients available from soiled water including any manure/slurry/soiled wastes 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. Where soil types are similar and cropping and treatments of the lands were the same during the previous five years or more, a composite sample from an area of up to 12 hectares is acceptable.
- An assessment of the relationships between soiled water application rates/slurry spreading, cropping routine, crop nutrient requirements and existing soil nutrient status on all land spreading areas.
- It is recommended that the applicant is requested to conform to 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 is recommended that it should be a condition of the licence that all such information is provided to the EPA in advance of any slurry transportation so that potential land banks can be risk assessed and evaluated for suitability.
- Ordnance Survey maps to a scale of 1:10,560 showing the location of the land spreading areas and all environmentally sensitive features on the lands or in their vicinity, including dwelling houses and other sensitive receptors, drains, streams, watercourses and other sources of water supply (wells, and sources of Public and Group Water Schemes)
- Organic wastes by their nature contain high concentrations of the nutrients nitrogen (N), phosphorus (P) and potassium (K). Wastes such as manures, soiled water 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. **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.**

Emissions to air including odour and noise

Attachment 7.4.1 'Emissions to Atmosphere – Main' indicates that the slurry tank and pigs are the main anticipated sources of emission to atmosphere.

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

In order to minimise odours from the facility it is recommended that minimal agitation of the slurry/soiled water contained in storage tanks tank is undertaken.

Ventilation must be provided to all sheds to avoid the build- up of odours. Mechanical ventilation systems must be inspected annually and any repairs required should be undertaken immediately.

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 an odour monitoring programme is implemented to ensure that the mitigation measures included in the Odour Management Plan are effective and that fugitive odours cannot be detected at the boundary of the facility.

The EHS notes the Noise Management Plan which is included in Attachment 7.1.3.2 and **recommends that the mitigation measures included as part of the 'Action Plan' are attached as conditions of the licence, are implemented in full and are monitored to ensure that any potential noise from the pig production facility does not create a nuisance to neighbouring residents.**

Pest Control

The Environmental Health Service notes in Chapter 4.3 of the Non-Technical Summary included with the licence application that '*a rodent and pest control programme will be implemented to minimise nuisance from pests*'. The EHS was unable to locate details of this Pest Control programme.

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 the Pest Control programme for the facility 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 programme.

Waste

Waste generated on site will include

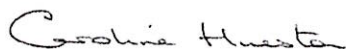
- Animal tissue waste
- Sharps / needles
- Mixed municipal waste
- Packaging Paper
- Fluorescent tubes

Sharps waste will increase by 5-6kgs per annum. Municipal waste will not change significantly.

Land spreading 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 land spreading on the local environment.

A list of 48 farms to be used for land spreading from the Ballyfiskin Enterprises facility is included in Attachment 7.6.2 (a).

It is 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)



Environmental Health Officer
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