



Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	HSE
Submission Title:	HSE Submission
Submission Reference No.:	S010382
Submission Received:	17 June 2022

Application

Applicant:	O'Connell Poultry Farms Limited
Reg. No.:	P1183-01

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
Dock Road
Limerick
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T: 00353 (0)61 461502 / 04 / 05

Seirbhíse Sláinte Comhshaoil
Halla Ashbourne
Páirc Gnó Ashbourne
Bóthar an Duga
Luimneach
V94 NPEO
T: 00353 (0)61 461502 / 04 / 05

Date: 17 June 2022

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

Re: Industrial Emissions Licence Application Reference: P1183-01

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

Name and Address of applicant: O'Connell Poultry Farms Ltd. Ahawilk, Feohanagh,
Castlemahon, 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

Industrial Emissions Licence Application
HSE Submission Report
Environmental Health Service Consultation Report

Date: 17 June 2022

Our reference: EHIS 2362

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

EPA reference: P1183-01

Type of Consultation: Industrial Emissions Licence Application

Applicant: O’Connell Poultry Farms Ltd, Ahawilk, Feohanagh, Castlemahon,
Co. Limerick

Nature of Activity: 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 10 May 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.

O’Connell Poultry Farms Ltd has applied for an Industrial Emissions Licence (P1183-01) for a free range poultry farm at Ahawilk, Feohanagh, Castlemahon, Co. Limerick. Two existing poultry houses on site have a capacity of 40,000 birds. Planning permission was granted by Limerick City and

County Council for the construction of two additional poultry houses in 2018 (Planning Reference 18/25) with an application for changes to the site layout and site boundaries granted permission in September 2021 (Planning Reference 21/469).

O'Connell Poultry Farms Ltd is applying for a licence to operate a poultry farm with a maximum stocking number of 100,000 birds. It is anticipated that numbers will not exceed the terms of the planning consent i.e. 76,000 birds.

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 are associated with the raising of poultry which include

- 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 the factory at c. 56 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
- Management of the associated range area

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 (EHS) has not received any complaints regarding O'Connell Poultry Farms Ltd existing poultry rearing facility.

In respect of this application, the areas reviewed were those of concern to Environmental Health, which are:

- Any potential contamination of surface or ground water
- Emissions to air including odour and noise

The documentation submitted in this licence application was reviewed with reference to 'BAT Reference Document for the Intensive Rearing of Poultry and Pigs' (2017).

Site Location

O'Connell Poultry Farms Ltd poultry farm is located in Ahawilk, Feohanagh, Castlemahon, Co. Limerick and is approximately 8.5km south east of Newcastle West and approximately 1.8km north-west of Feohanagh village, which includes a garage, shop and forecourt. The facility is accessed via a private access roadway off the L1311. The site area boundary is 8.62 hectares. A grassed area is included on site for free range.

Agriculture is the predominant activity in the locality which is rural in nature with isolated houses, mostly associated with farming and intensive agriculture activities. Lands surrounding the poultry farm are typically agricultural and are generally flat.

The nearest property is that of the family of Patrick O'Connell (O'Connell Poultry Farms Ltd) and is located approximately 80m west of the site.

The poultry farm is surrounded by a combination of hedgerows and fencing. Screening is provided by trees and the applicant has indicated that every effort will be made to further obscure the farm by planting additional hedgerows, native trees and shrubs. (Chapter 1.3 'Site and Surrounding Lands Description')

Surface and Groundwater

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

The Environmental Health Service notes that the River Bunoke runs approximately 180m to the west of the poultry farm but is unable to locate any reference to it in the licence application. **It is recommended that the licence includes conditions to ensure that water quality in the River Bunoke is protected from any potential contamination from runoff from the facility. Mitigation and monitoring measures for the protection of water quality in the River Bunoke should also be included as conditions of the licence.**

The processes and structures in place for the protection of ground and surface water are included in the EIAR, which states that *'surface water runoff from hard standing areas will be discharged through a perforated pipe laid in crushed stone to a water course'*.

Attachment 7.1 'Emissions Overview' indicates that there are no process emissions to surface water.

The EIAR states that *'there no direct discharges to soils or groundwater during the operation of the facility'* (Chapter 7.5.2 'Operational Phase')

The wash water and contaminated storm water from the facility are landspread.

Monitoring of storm water will be undertaken by means of regular inspection of surface drains around the site.

Washings from the cleaning of the poultry houses are directed to wash water storage tank which has a capacity of 150m³

Chapter 3.2 'The Use Of Natural Resources' of the EIAR states that '*water serving the Patrick O'Connell facility is supplied primarily from groundwater sources on site and the secondary public water supply*'. The area is served by the Killeedy Group Water Scheme. **It is recommended that if the onsite well supplies potable water to a domestic residence, the water supply should be tested annually in order to ensure that the well has not become contaminated and does not pose a risk to the health of its users.**

- **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 three soiled water storage tanks – two 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 Environmental Health Service has concerns regarding the number of intensive agriculture facilities in this area (West Limerick) and the capacity of local lands to accept soiled wash water for use as an organic fertiliser without posing a risk to local water supplies and consequently to public health.

Attachment 8 of the licence application 'Waste Generated and Animal By-Products Generated' indicates that 200 tonnes of wash water will be generated on site per annum.

The EHS therefore 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 650-750 tonnes of poultry manure will be generated in the facility.

The Environmental Health Service recommends that details are provided of the 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 5- 10 tonnes of poultry tissue waste will be generated annually

- **Noise**

The area in which the poultry growing facility is located is rural in nature with the nearest third party residence is located approximately 280m from the site with additional properties in excess of 400m from the facility.

A noise impact assessment undertaken as part of the planning application for the poultry houses states that *'there will be a number of new noise sources associated with the proposed buildings feed systems, fans, birds in the buildings'* but that with the implementation of precautionary measures, such as a regular preventative maintenance programme, noise emissions should be kept to a minimum and that tonal noise will not be introduced due to faulty motors. (Chapter 8.7 'Proposed Mitigation and Enhancement Measures')

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 9.3 'Existing Environment' of the EIAR states that following an odour survey undertaken on site an ammonia odour was detected within the poultry house, however, *'this was not detectable outside or around the neighbouring properties'*. The survey concludes that *'the odour impact model predicts that odour levels are substantially below the odour detection level for 98 percent of the time at the nearest houses to the poultry operation'*.

Mitigation measures proposed for the management of odour generated by the facility are outlined in Chapter 9.6 'Mitigation Measures' of the EIAR. It concludes that *'the predicted odour concentrations are below the recommended guideline odour exposure limit value for emissions from a poultry site to prevent a potential odour nuisance at the nearest houses'*.

The EHS recommends that details are provided of the proposed 'efficient management' and 'maintenance programme' proposed to be implemented as mitigation measures in order to prevent an odour nuisance arising from the poultry farm facility

Conclusion

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

- That the licence includes conditions to ensure that water quality in the River Bunoke is protected from any potential contamination from runoff from the facility.
- Mitigation and monitoring measures for the protection of water quality in the River Banoke should be included as conditions of the licence.
- If the onsite well supplies potable water to a domestic residence, the water supply should be tested annually in order to ensure that the well has not become contaminated and does not pose a risk to the health of its users.

- Details are provided as to the number of times per annum that the washwater storage tanks are emptied
- Integrity testing of wash water storage tanks is undertaken on an annual basis.
- The applicant should 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.
- That details are provided of the recipient farmers receiving the manure and of the address of the land banks to be used for the spreading of manure
- Poultry litter should not be removed during periods of heavy rain
- 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
- That details are provided of the proposed '*efficient management*' and '*maintenance programme*' proposed to be implemented as mitigation measures in order to prevent an odour nuisance arising from the poultry farm facility

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