



Submission

Submitter:	Miss Eve Smith
Organisation Name:	National Office for Environmental Health Services
Submission Title:	HSE Submission EHS
Submission Reference No.:	S011472
Submission Received:	18 January 2024

Application

Applicant:	Carhue Piggeries Limited
Reg. No.:	P0621-03

See below for Submission details.

Attachments are displayed on the following page(s).

HSE South Emergency Management Consultation Report			
Report to	Deirdre Fitzell, PEHO, Cork South Lee	Date	15 th Dec., 2023
Type of consultation: EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
Other (please specify): Industrial Emissions			
Authority	EPA / HSE / Cork County Council		
EPA Reference Number	P0621-03 EHIS 3588		
EM Reference Number	EMENV 185		
Applicant	Carhue Piggeries Ltd., Cooliboy, Bandon, Co. Cork.		
Proposal	The rearing of pigs in an installation where the capacity exceeds 2,000 places for production pigs which are over 30kg		

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>	





An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health
Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

HSE EIS SUBMISSION REPORT
Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000,
& Regs made thereunder).

Date: 18/1/2024

Our Reference: 3588

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

EPA Reference: P0621-03

Type of Consultation: Industrial Emissions Licence

Applicant: Carhue Piggeries Ltd, Cooliboy, Bandon, Co. Cork

Nature of Activity:

<u>Classes and Nature of Activity in accordance with the EPA Act 1992 as amended</u>			
Class of Activity	Main Activity	EPA Act Sector (where applicable)	Class of Activity Description
6.2 (a)	No	Intensive Agriculture	The rearing of pigs in an installation where the capacity exceeds - (a) 750 places for sows
6.2 (b)	Yes	Intensive Agriculture	The rearing of pigs in an installation where the capacity exceeds - (b) 2,000 places for production pigs which are over 30kg

Introduction

The following HSE departments were notified of the consultation request for this development on the 14-12-2023:

- HSE South Emergency Management
- Estates
- Director of National Health Protection
- CHO

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

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

- Any potential contamination of surface water and ground water
- Emissions to air including noise and process emissions

Development:

The purpose of this application is to facilitate and incorporate the necessary developments on site to future proof the operations and to ensure compliance with current regulatory standards.

1. It is proposed to change the site boundary to incorporate four new additional pig houses, which are clearly marked on the attached drawings, which are constructed but not operational, for which planning permission was granted under Planning File

Ref No 09-896 with an extension granted under planning File Ref No 14-493

2. It is proposed to have the following Stock capacity of:

- 1750 Total Sows
- 7000 Weaners
- 9000 Fatteners
- 295 others (Boars & Gilts) with the incorporation of the four new modern design houses.

3. It is proposed to install an additional storm water discharge point on site along with additional wells.

Noise/Air emissions:

It is stated that noise generated in the proposed development will not exceed legal limits at any noise sensitive location.

The applicant cites the following noise limits will be complied with:

- Daytime dB LAr, T (30 minutes) 55
- Evening dB LAr, T (30 minutes) 50
- Night-time dB LAeq, T (30 minutes) 45

The Environmental Health Department has not received any noise complaints regarding the operation of this facility to date.

In May 2021, due to a high volume of intensive agriculture applications/reviews and licenses, the Environmental Protection Agency (EPA) published guidance, referred to here as the EPA 2021 Ammonia Guidance, on how applicants should assess, the predicted impact of air emissions, as part of a licence application for the following activities listed under the First Schedule of the Environmental Protection Agency Acts 1992.

EPA's Air Dispersion Modelling Guidance Note (AG4) states that the dispersion process is dependent on the underlying meteorological conditions and ensuring that the air dispersion model includes representative meteorological data is critical. In the absence of site-specific meteorological data, AG4 requires the use of representative data observed at a Met Eireann monitoring location.

The odour assessment was conducted in accordance with recognised techniques for dispersion modelling specified in EPA's Air Dispersion Modelling Guidance Note (AG4). The dispersion model, CALPUFF, was used to predict ground-level concentrations of odour across the model domain due to the pig farm. The assessment of odour has also been conducted in accordance with EPA's instruction note for the assessment of odour emissions from intensive agriculture pig installations (EPA, 2022).

The OIA has found that odour emissions from the pig farm are unlikely to adversely impact nearby residential locations. Dispersion modelling that has been conducted as part of the OIA shows that predicted concentrations comply with the odour criterion recommended by EPA for existing pig farms of 5.0ouE/m³ at all sensitive receptors included in the assessment.

Further Examples/ controls to contain Odour emissions:

- Reducing uncontrolled air movement.
- Filling and emptying liquid manure storage tanks from below the surface of the stored manure, where feasible.
- Transporting manure in suitably contained, leakproof vehicles.
- Minimising the agitation of manure.
- Minimising the generation of odours during meteorological conditions which favour the spread of odours.
- Landscaping pig houses using shelter-belts

Water/Storm Water

Periodic water quality monitoring of relevant parameters as per licence. Where appropriate, test wells should be provided at the site of the pig unit and on the landspreading areas used for spreading manure.

Pig Manure (including dirty surface water)

The application describes pig manure as the main secondary product produced on the farm which is made available to customer farmers for use as an organic fertiliser on their lands.

The EHS recommends that the storage facilities for pig manure are bunded to 110% of the storage facility in line with Dept. of Agriculture, Food and Marine standards.

The EHS recommends that access to pig manure for use in landspreading by local farmers is restricted to times of the year when the landscape can safely absorb such manure in order to protect surface and ground water sources and minimise odours to sensitive receptors. There may be a cumulative effect at play if other large sources of slurry in the locality are being utilised at the same times.

Waste

Waste must be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest. Measures must be taken to ensure that waste generation is avoided in accordance with the waste hierarchy in Council Directive 98/2008/EC on waste and section 21A of the Waste Management Act 1996, as amended. Where waste is generated, it must be prepared for re-use, recycled or recovered or, where that is technically and economically impossible, it can be disposed of while avoiding or reducing any impact on the environment (applicants should provide this information in the context of the Waste Management Act 1996 as amended).

The EHS recommends proper segregation of waste into different waste streams for appropriate handling and management by appropriately authorised waste contractors. Animal tissues or carcasses should be stored and transported in sealed leakproof containers.

Pest/Vector Control

Reference could not be found in the NTS to the issue of Pest/Vector Control. On a day to day basis the facility should operate a vector control plan to limit/eliminate the potential proliferation of disease vectors such as rodents, flies, and other potential vectors.

The EHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

Climate/Energy use

The Environmental Health Service (EHS) recommends that clean water from roofs and yards is collected/harvested in attenuation tanks for example, to maximise water efficiency and limit potential discharges that may cause flooding in the local area. This is in the context of climate change where the frequency and intensity of precipitation is expected to increase as global temperatures increase.

Consideration should be given going forward to renewable energy sources. Renewable energy is energy produced from sources like the sun and wind that are naturally replenished and do not run out. Renewable energy can be used for electricity generation, space and water heating and cooling, and transportation.

Conclusion:

It is recommended that a formal complaints procedure should be outlined to resolve any possible issues or community concern in relation to traffic, dust, water, noise, odour or nuisance complaints.

Providing the development is kept as per the specifications detailed and operated and maintained as per Department of Agriculture, Food and Marine Guidance, the EHS is of the opinion that there is adequate protection of Public and Environmental Health in the license conditions.



Eve Smith

Environmental Health Officer

Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Environment/Climate Change, Network Support Unit (NSU)

Seirbhís Sláinte Comhshaoil, Ospidéal Pobail an Chloic Liath, Bóthar Ghaoth Dobhair IAn Clochán Liath, Leitir Ceanainn, Co.Dhún Na NGall F94 Y326

Environmental Health Officer, Environmental Health Service, Dungloe Community Hospital, Letterkenny Co. Donegal. F94 Y326

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An tOifig Náisiúnta um Sláinte Chomhshaoil

Feidhmeannacht na
Seirbhíse Sláinte,

Urlár 2, Teach na Darach, Ascaill na Teile

Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental
Health Services

2nd Floor, Oak House, Lime Tree Avenue

Millennium Park, Naas, Co. Kildare

Eircode: W91KDC2



18/01/2024

EPA headquarters

Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford
Y35 W821

EPA Reference: P0621-03

Type of Consultation: Industrial Emissions Licence

Applicant: Carhue Piggeries Ltd, Cooliboy, Bandon, Co. Cork

Dear Sir/Madam

Please find enclosed the HSE Environmental Health Service consultation report in respect of the above Licence.

The report is based on an assessment of documentation submitted to this office and was compiled following a site visit undertaken earlier this month by Tom Sugrue Environmental Health Officer. If you have any queries regarding this report, the initial point of contact is Eve Smith -Environmental Health Officer.

Yours sincerely



Eve Smith

Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Environment/Climate Change, Network Support Unit (NSU)

Seirbhís Sláinte Comhshaoil, Ospidéal Pobail an Chloic Liath, Bóthar Ghaoth Dobhair IAn Clochán Liath, Leitir Ceanainn, Co.Dhún Na nGall F94 Y326 Environmental Health Officer, Environmental Health Service, Dungloe Community Hospital, Letterkenny Co. Donegal. F94 Y326
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The Health Service Executive is continually striving to improve the quality of its service. If you have any feedback on your recent interaction with the Environmental Health Service please contact the Principal Environmental Health Officer on the above phone number.
