



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Department of Public Health
Health Service Executive
Mid-Western Area
31-33 Catherine Street
Limerick
Tel: 00353 (0) 61 483337
Fax: 00353 (0) 61 464205
Website: <http://www.mwhb.ie>

15th October 2007



Office of Licensing and Guidance,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: Integrated Pollution, Prevention and Control Proposed Determination of Review of Licence.
Applicant: Aughinish Alumina.
Licence Reg No: P0035-04

Dear Sir/Madam,

In the submission made by the HSE in April 2006 the following elements were recommended for inclusion in any IPPC licence: dust control strategy, robust air quality monitoring system and the requirement for operator-funded health studies in the event of exceedances giving rise to health concerns.

The inclusion of the first two elements in the proposed determination including the proposal to provide cover for tankage at the Local Authority Water Treatment Plant is welcome as indicated in the enclosed comments from Limerick Environmental Health Service. The third element was recommended in the absence of routinely available local area morbidity indicators (e.g. hospital admission rates for respiratory illness, prescription rates etc) which in many other countries complement the standards based approach. Where emission limits are established for the purposes of human health protection. Because this will not become available until COMREG implements an Irish geocode system additional expectations are placed upon the standards based emission limit approach to provide reassurance in relation to health protection.

In this context it is recommended that:

- Condition 5.8 in the proposed determination should be linked with Condition 2.2.2.7 to ensure availability of real-time information to the public
- The ambient air monitoring programme should be reviewed and modified regularly in line with best available technology internationally
- A component of independent monitoring should be included in the monitoring of emissions/discharges from the facility

Yours sincerely,

TMB Greally

Dr T. Greally FFFPHMI
A/Director of Public Health



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service,
Health Service Executive,
West,
Ashbourne Hall,
Ashbourne Business Park,
Dock Road,
Limerick.

Tel: 00353 (0)61 461505 / 04 / 02
Fax: 00353 (0)61 461503
Website: <http://www.hse.ie>

09.10.07.

cr

Dr. Tessa Greally
A/Director of Public Health
Health Service Executive
31/33 Catherine Street
Limerick

Re: Integrated Pollution Prevention & Control Proposed Determination of Review of Licence.

Applicant: Aughinish Alumina Ltd.
Location: Aughinish East, Aughinish West, Island MacTeige, Glenbane West & Fawnmore, Askeaton, Co. Limerick.
Licence Reg No: P0035-04

Dear Dr. Greally,

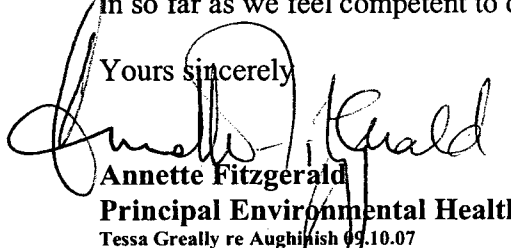
I refer to copy of the above proposed determination which you forwarded to this office for comment.

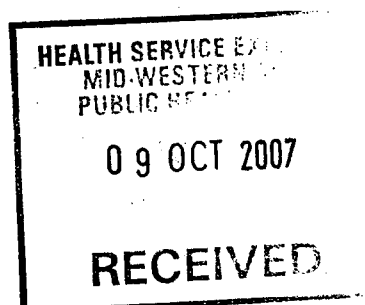
I also refer to a previous report forwarded to Dr. Kevin Kelleher on 24.08.05.

I have discussed the Proposed Determination with Andrew Curtin, Senior Environmental Health Officer and attach herewith for your information copy of Mr. Curtin's report on same.

Attached report cannot be considered a comprehensive assessment of the proposal as this department has commented on the document from an Environmental Health viewpoint, only in so far as we feel competent to do so.

Yours sincerely


Annette Fitzgerald
Principal Environmental Health Officer.
Tessa Greally re Aughinish 09.10.07



03.10.07.

cr

Ms. Annette Fitzgerald
Principal Environmental Health Officer
Ashbourne Business Park
Dock Road
Limerick

Re: Integrated Pollution Prevention & Control Proposed
Determination of Review of Licence.

Applicant: **Aughinish Alumina Ltd.**
Location of Installation: **Aughinish East, Aughinish West, Island Mac**
Teige, Glenbane West & Fawnmore, Askeaton, Co.
Limerick
Licence Register No: **P 0035-04.**

Dear Ms. Fitzgerald,

I am in receipt of a copy of the above proposed determination. The Environmental Protection Agency has proposed to grant a revised licence for the activity under certain conditions which are laid down in the proposed determination document. A series of schedules attached to the proposed determination set out emission limit standards for environmental emissions and discharges.

I refer to previous report from this office on the 18.08.05 in relation to this application and the environmental health concerns raised in relation to the application. ie. Dust, noise, odour, atmospheric emissions, surface water and groundwater discharges.


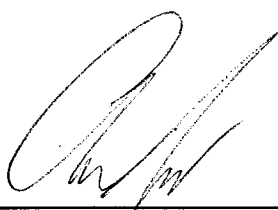
The conditions laid down by the EPA in the proposed determination of the licence application have addressed these matters. Even though there will be an increase in production at the facility, it is noted that emission limit values as laid down in Schedule B of the determination have been maintained in line with the current licence save for Emission Point 2 (Calciner Stack) which reduces the emission limit for oxides of sulphur from 1,350 mg/m³ to 800mg/m³. The maximum hourly volume rate for emissions from the stack has been increased from 831,400 m³ to 894,000 m³. As specified in the revised licence in 2004 ,as

and from January 1st 2008 NO₂ emission levels from the boiler house in area 14 must be reduced to 450mg/m³ from 750mg/m³.

In the original report from the Environmental Health Dept. concerns were raised in relation to the proximity of Phase 2 of the Bauxite Residue Disposal Area to the existing Limerick Co. Council water treatment plant at Fawnmore. This has been addressed in the determination but the specifics on the measures to be taken (i.e. covering of tankage) have not been decided. Great care will have to be taken in this area to prevent contamination of the water from dust arising from the enlarged Bauxite Residue Disposal Area which will also be situated in closer proximity to the water treatment works than previously.

In relation to monitoring emissions and discharges from the facility it is felt that due to the increase in the level of activity at the site it would be appropriate for independent monitoring of all emissions be carried out at least for a period following the increase of productivity at the plant and the increase of the area and new location of the Bauxite Residue Disposal Area.

Signed:



Andrew Curtin

Senior Environmental Health Officer.

A. Fitzgerald re Aughinish 03.09.07.

For inspection purposes only.
Consent of copyright owner required for any other use.