



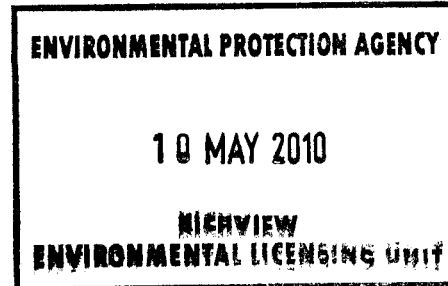
Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

#7
Environmental Health Service,
Health Service Executive,
West,
Ashbourne Hall,
Ashbourne Business Park,
Dock Road,
Limerick.

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10.05.10

Attn: Mr. Patrick Morris – Programme Officer
Office of Climate, Licensing Resource Use
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



re: **Waste Licence Application for in-vessel composting facility
Waste Management (Licensing) Regulations 2004**

Location: **Durnish, Foynes, Co. Limerick**

Applicant: **Greenport Environmental Ltd.
The Red Church
Henry St.,
Limerick**

Register No: **W0271-01**

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Dear Sir,

I wish to confirm that this office is in receipt of Addenda I & II to the EIS in support of the above Waste Licence application and has the following comment to make from a public health perspective:

The Applicants propose to convert and extend the existing timber-frame construction facility to accommodate a fully-enclosed anaerobic digestion and in-vessel composting facility with a capacity to receive 50,000 tonnes of organic waste per annum. The addenda have been submitted in response to a request for further information as requested by the EPA.

Due to the nature of in-vessel composting, air pollution is potentially the most significant impact which can arise. Consequently, much of the information supplied in this submission relates to air monitoring and control methods.

In response to a request for clarification on the impact of air quality from the combustion plant, the authors have submitted air dispersion modelling using an EPA approved air dispersion model. This provides both *conservative* and *worst-case* estimates and the report compares these with the Emission Limit Values (ELVs) set down in the EC (Air Quality Standards) Regulations 2002 S.I. 271 of 2002.

The by-products of the combustion process are SO₂, NO_x, CO, TOC and non-methane hydrocarbons.

The modelling study indicates that emission from the exhaust stacks will not exceed the ELVs set down in these regulations at maximum emission levels and therefore local ambient air quality will not be adversely affected.

Apart from chemical pollution, the issue of odour is also addressed. The manufacturers of the biofilter have provided certification that the emissions shall achieve the <500 odour units/m³ (OU/m³) limit as described in TA Luft. Again, modelling has been conducted which provides data on the ground level concentrations of odour (OU/m³). The closest receptor is 450m to the southwest of the site and a level of 0.55 OU/m³ is estimated at that point (The prevailing winds are south-westerly and the nearest receptor is therefore upwind of the emission point). The report states that exhaust air leaving the compost tunnels will be conveyed to the humidifier via a sulphuric acid scrubber to neutralise any basic gases such as Ammonia (NH₃).

Other information of relevance to public health contained in this submission are summarised as follows:

- ⇒ Sanitary waste from the staff facilities will be discharged via an on-site Bord na Mona *Puraflo* system to the existing foul sewer currently owned by the Atlantic Fuel Supply Company and which operates under an existing discharge licence.
- ⇒ Any supernatant liquid from the composting process will be taken by tanker from the site to be disposed of to the Limerick Main Drainage plant at Bunlicky, Limerick.
- ⇒ The noise impact study indicates a current LA_{eq 1 hr} of 63dB(A) at a sensitive receptor 450m to the south of the site. The maximum predicted level arising from the proposed development at the same point is 38 dB(A) LA_{eq 1 hr}.
- ⇒ No additional information on pest control has been supplied.
- ⇒ No contingency plan to contend with mechanical breakdown has been provided.

Conclusion:

This office has no objection from an environmental health perspective to the granting of a waste licence for the proposed facility, subject to the following conditions:

1. **The waste facilities should comply with the provisions of the segregation of packaging and the storage of waste guidelines as issued by the Department of Health & Children in April 2004.**
2. **The Applicants shall be requested to detail the contingency plan which will operate should the plant suffer a power loss and/or a mechanical breakdown. The contingency plan should identify the following:**
 - a. **The procedure for re-directing waste which is about to or has already entered the plant but cannot enter the composting process until operation resumes.**
 - b. **The venting procedures for the plant in the event of a breakdown in the mechanically-controlled air pressure system.**
3. **Should the application be successful, the Applicants shall operate the plant in accordance with the requirements of the Air Pollution Act 1987, the Air Quality Standards Regulations 2002 and with the provisions laid down by the Environmental Protection Agency in the Waste Licence.**
4. **Microbiological sampling of the atmosphere for bioaerosols shall be carried out downwind of the plant when operational and results of same forwarded to the relevant authority. All records of atmospheric monitoring shall be kept on-site and details of same forwarded to Limerick County Council on a regular basis.**
5. **All accidental releases of un-treated gases to the atmosphere shall be notified to the relevant authority immediately.**
6. **The plant shall be constructed and operated in accordance with the Health, Safety & Welfare at Work Act 2005 with specific reference to the supply of personal protective equipment for staff and to the ventilation of the work areas.**
7. **The plant shall be operated in accordance with the the Environmental Protection Agency Act 1992 (Noise) Regulations, 1994 and with the Waste Licence as may be issued by the EPA.**
8. **The plant shall be operated in accordance with best practice guidelines as provided by the Composting Association of Ireland and the UK Composting Association.**
9. **A pest control plan shall be devised and implemented, and all pest control records shall be kept on-site and made available for inspection.**
10. **The Applicants shall ensure that the Bord na Mona *Puraflo* package treatment plant is installed and maintained in accordance with the manufacturers' instructions and specifications.**
11. **All delivery trucks shall be inspected:**
 - A. **upon arrival to ensure that they are fully covered and not in an unsanitary condition**

AND

B. upon exit to ensure that they have been properly cleaned and all waste debris has been removed from the wheels and undercarriage so as not to cause odour or litter nuisance en-route to or from the plant.

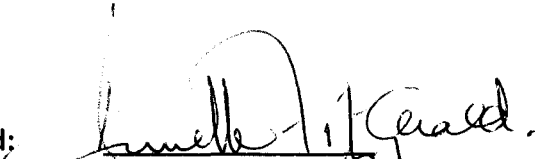
12. The Applicants shall ensure that supply of materials to the plant is demand-led in order that a build-up of foul raw material should not occur.

Should you wish to discuss this matter, please do not hesitate to call this office on the above numbers.

Yours sincerely,

Signed: 

Thomas Boland
Environmental Health Officer
Greenport Environmental Ltd. W0271-01 10.05.10

Agreed: 

Annette Fitzgerald
Principal Environmental Health Officer

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