

Sub (2)

**Ann Kehoe**

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**From:** SIOBHAN MURPHY <siobhan.murphy6@hse.ie>  
**Sent:** 02 November 2012 18:14  
**To:** Licensing Staff  
**Subject:** New submission entered for Reg no: W0287-01. (Reference Number: W0287-01-121102061315)  
**Attachments:** Ormonde Organics Ltd EPA Submission.doc  
**Importance:** High

**Title:** Ms  
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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Department,  
Waterford Community Services,  
Cork Road  
Waterford.

Tel: 051 842800  
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Ms. Ann Kehoe,  
Programme Officer,  
Office Of Climate, Licencing and Resource Use,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Co. Wexford.

31st October 2012

**RE: Waste Licence Application – W0287-01**  
**Applicant: Ormonde Organics Ltd.**

Dear Ms. Kehoe,

Please find enclosed the Health Service Executive (HSE) consultation report in relation to the above proposal:

If you have any queries regarding any of these reports, the initial contact is Ms Siobhan Murphy, Principal Environmental Health Officer who will refer your query to Mr Eugene MacDonagh, Environmental Health Officer the person dealing with this application.

### **Environmental Health Report**

The Environmental Health Service response to the proposal is in the attached consultation report:

- The assessment is based on an assessment of documentation submitted to this office on 3<sup>rd</sup> October 2012 by Ann Kehoe,
- A site visit was conducted on the 18<sup>th</sup> October 2012.

- A meeting was held on the above date with Mr. Pat Cormack Environmental Manager and Mr. Sean McGrath, Site Project Manager, Ormonde Organics, Ltd.
- Additional Information was provided by discussions with the residents of the domestic dwellings closest to the facility, the owners and employees in a nearby fruit farm and two residents in dwellings across the river in Co Kilkenny.
- The HSE were not included at the Screening / Scoping stage of this application.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- No additional investigations / measurements were undertaken.
- This report refers only to those sections of the documents which are relevant to the HSE.
- We have made observations and submissions under the following specific areas:
  - Human Beings
  - Water
  - Air
  - Noise

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Yours Sincerely,

*Siobhan Murphy*

Principal Environmental Health Officer

*Eugene MacDonagh*

Environmental Health Officer

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to:

**Ms. Siobhan Murphy,  
Principal Environmental Health Officer,  
Waterford Community Services,  
Cork Road,  
Waterford**



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Department,  
Waterford Community Services,  
Cork Road  
Waterford.

Tel: 051 842800  
Fax: 051 842811

**HSE EIS SUBMISSION REPORT**  
**Environmental Health Service Consultation Report**  
**October 2012**

(as a Statutory Consultee (Planning and Development Acts 2000 & Regs made thereunder))

**Report to:** Ms. Ann Kehoe, Programme Officer,  
Office of Climate, Licensing and Resource Use,  
Environmental Protection Agency,  
PO Box 3000, Johnstown Castle Estate,  
Co. Wexford.

**Type of consultation:** EIS  Scoping  Screening (constraints)

**Other (please specify):** \_\_\_\_\_

**Planning Authority:** Environmental Protection Agency

**Reference Number:** W0287-01

**Applicant:** Ormonde Organics Ltd, Killowen, Portlaw, Co. Waterford.

**Proposed Development:** Environmental Impact Statement for Anaerobic Digestion Facility at Ormonde Organics Ltd, Killowen, Portlaw, Co. Waterford.

**This report only comments on Environmental Health (EH) Impacts of the proposed development as outlined in this EIS and the adequacy of the EIS from an EH viewpoint. We have made observations and submissions on the following specific EH areas;**

**Human Health:**

No evidence that the applicant has undertaken meaningful public consultation with the local community / residents could be identified in the EIS. If consultation was carried out there was no evidence that their views, concerns, fears or opposition were incorporated and described in the EIS. Existing negative issues in relation to odour nuisances

experienced by nearby residents were not outlined (10 complaints logged this year with Waterford County Council Planning/ Environment Department) and quantified. The reasons for the existence of these odour nuisances in the past and up to the present and any corrective action(s) taken to abate them were not discussed in the EIS.

The EIS fails to make an informative assessment or risk assessment of what will be the character of the final effluent with reference to the levels of pathogens and toxic chemicals such as PCB'S/dioxins/lead/mercury. Land application of sludge can lead to the transport of pathogens including virulent antibiotic resistant microbes, parasites and environmentally persistent chemicals through bioaerosols downwind of spreading sites, through contamination of ground water, drinking water wells, surface waters, or through food contamination from eating food grown in sludge spread lands. With the proposed intake of waste containing Animal By Products the concerns with regard to infectious prions from animal and human sources which can cause transmissible spongiform encephalopathies are not addressed in the EIS.

A Risk Assessment of the facility workers including transport workers and workers spreading the final effluent on land from bioaerosols are not addressed at all in the EIS.

At construction stage there is a lack of detail with regard to the construction workers as to how many workers will be working on the site at peak times, the sanitary facilities to be provided and waste/pest management control measures to be implemented on the construction site.

### **Noise:**

At the construction stage there is no quantified figure as to the level of increase in traffic that may occur during construction which may lead to a subsequent increase in noise levels in the surrounding community. Also temporary, short term noise impacts caused during certain phases of construction are not described. The proposed operating hours during the construction phase are from 07:00 to 19:00hrs Monday to Friday and 07:00 to 17:00hrs Saturday. It is recommended that an 08:00 start for all construction works Monday to Saturday be imposed to minimise noise nuisance to nearby residents including construction work to finish at 14.00hrs on Saturdays.

At the operation stage for the new development, there was no quantified mention of the increase in delivery traffic to the facility. Collection traffic vehicle from the facility were quantified in the EIS at approx 5-8 extra vehicles per week. With the volume of waste proposed to be processed to increase substantially up to a max of 40,000 tones/year from the present 8,000 tones/year this increase in delivery traffic needs to be quantified and its potential noise impact on the surrounding environment stated

**Water:**

The volume of abstraction of water for drinking and for the operation of the facility not quantified in relation to the proposed new well. Potential impact on ground or surface water including any nearby wells or group water schemes has not been identified in the EIS.

**Air:**

During my meetings and discussions with nearby local residents the issue of odour control from the facility was of the most concern to these residents. In the past and up to the present day they stated they have experienced many incidents of odour nuisance from the existing facility. It was noted in the EIS that there was no record of the number of previous odour complaints and what corrective actions was taken to abate the nuisances since the existing facility opened. This year so far there has been ten complaints logged with regard to odour nuisance from the existing facility, with Waterford County Council Planning/ Environment Department. Taking these already existing complaints into consideration and the aforementioned proposed substantial increase in the volume of waste to be processed in the facility (see Noise section) we would have concerns with regard to the facility's future ability to control odour nuisances being emitted from the facility to the local environment.

The EIS does not adequately address what happens when there is a break down in the facility that may lead to the emission of four odours to the nearby environment. There have been breakdowns associated with similar facilities in the past and there is certainly a potential in the future for breakdowns due to the heavy wear/tear of the process involved in these type of operations, in particular in relation to mechanical break down's of the gas engines.

The EIS mentions the proposed use of a new Gas flare chimney when one of the gas engines is shut down for servicing. There is no detail as to the actual height of this gas flare which is important to know in order to assess its potential for the proper dispersal of any odours or any detail as to the character of odour emissions from the gas flare when in use, which in practice can be very strong when these gas flares are in operation.

The proposed new anaerobic digestion(AD) plant it is stated in the EIS will be further away from the nearest sensitive receptor to the North West. However its proposed position will actually be positioned closer to an operational fruit farm to the south and domestic dwellings on that farm This distance between the proposed AD plant and the farm is not quantified in the EIS.

During the construction phase dust control measures during dry weather periods are not outlined in the EIS.

The fire risk impact on the surrounding environment arising from the Biogas produced by the facility is not addressed by the EIS.

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