Sub

HSE South. Waterford Community Services, Cork Road. Waterford, Ireland.

> Telephone 051 842800 Fax 051 842811

Environmental Health Department,

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

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RE: Waste Licence Application – W0234-02, My monther use Applicant: Waterford City Council.

Please find enclosed the H.S.E Waterford Environmental Health service 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 E.H service response to the proposal is in the attached consultation report:

- The assessment is based (solely) on an assessment of documentation submitted to this office on the 18th December 2012 by the H.S.E- National Environmental Health Office, Nass, Co. Kildare.
- A site visit was conducted on the 22nd January 2013.



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- 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 Waterford Environmental Health Service.
- We have made observations and submissions under the following specific areas:
 - \triangleright Human Beings
 - \triangleright Noise
 - \triangleright Air

Yours Sincerely,

other

Principal Environmental Health Officer of this report should be forwarded to

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

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> > 0 6 MAR 2013

H.S.E - Waterford Environmental Health Service Report

- Report to: Ms. Ann Kehoe, Programme Officer, Office of Climate, Licensing and Resource use, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, Co. Wexford.
- ENVIRONMENTAL PROTECTION AGENCY

0 6 MAR 2013

Type of consultation: EIS N/A Scoping N/A Screening N/A

Other: Waste Licence Review,

Planning Authority: Environmental Protection Agency,

Reference Number: W0234-02,

Applicant: Waterford City Council.

Proposed Development: Anacrobic Digestion Facility at Waterford City Composting facility Green Road, Kilbarry.Six Mile Cross Roads Business Park, Waterford.

This report only comments on Environmental Health (E.H) Impacts of the proposed development as outlined in this Waste Licence Review application and the adequacy of the Waste Licence Review from an E.H viewpoint. We have made observations and submissions on the following specific E.H areas;

Human Health:

Negative issues in relation to odour nuisances experienced by nearby residents in the past were outlined although it should be noted that no complaints were received by the Waterford H.S.E Environmental Health Service during the operation of the original composting facility.

The Licence review application fails to make an informative risk assessment of the character of the final effluent. Mention is made with reference to the microbial analysis of the final digestate without addressing the levels of toxic chemicals such as PCB'S / dioxins / lead / mercury. Land application of the final sludge can lead to the transport of pathogens including virulent antibiotic resistant microbes, parasites and environmentally resistant chemicals, through bio aerosols 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 Licence review application. Risk to the facility workers, the transport workers and workers spreading the final effluent on land from bio aerosols are not addressed properly in the screening report.

Noise:

At the operation stage for the new development, there was no quantified mention of the increase in waste collection traffic from the proposed facility. This increase in waste collection traffic needs to be quantified and its potential noise impact on the surrounding environment stated.

<u>Air:</u>

With regard to the local residents, the issue of odour control was the one of most concern to them. There was no record of the number of previous odour complaints from local residents with regard to the existing but closed down composting facility previously run by Waterford City Council in Kilbarry.

At a similar composting operation nearby in Portlaw (Waste Licence Application-W0287-01) last year there were ten complaints logged with regard to odour nuisance from that existing facility, with Waterford County Council Environment Department.

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