

HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Act, s 2000,
& Regulationss made thereunder).

October 15th 2013

Maire Buckley
Programme Officer
Office of Climate, Licensing and Resource Use
Environmental Protection Agency
Regional Inspectorate
Iniscarra,
Co. Cork



Type of consultation: Environmental Impact Statement (Human Environment Assessment)

Planning Authority: Limerick City Council

Reference Number: W0281-01

Applicant: Bord Gais Eireann

Proposed Development: Construction of a District Regulator Installation (DRI) Unit and relocation of the existing ESB sub-station to the O'Curry Street elevation. The demolition of the remaining masonry wall on O'Curry Street (between the junction with Dock Road and the DRL) and rebuilding of same in rendered blockwork. The demolition of the free-standing internal walls (with the exception of the short return walls that form part of NIAH Reference 21517005, which will be retained), boundary improvement works to the St. James Mews boundary walls and provision of a granular cover layer over the entire site. The development will also include the remediation clean-up of the contaminated soil that lies within the footprint of the site. A Waste Licence application (accompanied by an Environmental Protection Agency (Reg. No: W0280-01) under the Waste Licence Management Act 2011-2011. The site contains 2 no. protected structures (Record of Protected Structures Reference numbers RPS261 & RPS326). An Environmental Impact Statement and Natura Impact Statement will accompany the planning application.

Introduction

This office has examined the Human Environment Assessment submitted in support of the waste licence application connection with the above proposal.

The report from this office on the planning application submission highlighted a number of points which were considered to be of concern from a public health perspective which can be summarised thusly:

1. The identification of potential population sub-groups who may be subject to direct or indirect health effects from the proposed remediation process. Specifically, sub-groups including children (school-going), elderly or immuno-compromised individuals.
2. The development of a more detailed consultation/communication plan.
3. A detailed Pest Control Management Plan
4. Details of proposed implementation and verification plan
5. Proposal/plan for long term monitoring and maintenance of the site

The Applicants have submitted a Human Environment Assessment (HEA) along with Specification and Drawings for the project. However, as a contractor has yet to be appointed for the project, some of the information requested remains undefined.

The HEA contains information which addresses some of the issues raised as follows:

A study of the local population demographic was undertaken under various headings such as Population levels, Age profile and Employment status. Community groupings such as residential, working and visiting population were also examined. The report then looks at the potential impacts of each stage of the proposed re-development on the existing community.

The conclusions drawn are that main population cohort is of working age and that the number of the most susceptible cohort i.e. females aged below 5 years of age are minimal. The potential impacts are generally positive or neutral but it is envisaged that some will, at worst, be of *Negative* quality, *Slight* significance and *Temporary* duration. These are mainly during the remediation phase and relate to the operation of plant on-site, the release of odours and the control of dust.

In relation to the previous gasworks remediation projects in Waterford and Cork, contact has been made with various bodies to establish the extent of complaints associated with each. While there would appear to be no evidence of complaints for the Cork project, the EPA Office of Environmental Enforcement has related that 21 complaints were received relating to the Waterford site, mostly to do with odour.

Comment:

The comparison with previous projects is not necessarily precise. While it is envisaged the treatment process to be used will reduce the odour impact, the population density in the surrounding area is much higher in Limerick and this may lead to more complaints. The control of dust and odours from this process is likely to have the greatest impact on the surrounding area, whichever demographic is involved. Strict controls and monitoring of all aspects of the remediation process, especially trucks removing contaminated soil from the site is imperative. Should each truck not be properly covered and supervised, fugitive dust deposits and odours are likely to arise.

The Specification and Drawings section sets out the requirements laid down in the tendering process. These contain specific requirements for the contractor to have in place lines of communication through which the public can voice concerns and/or make complaints. It contains specific instructions on the operation of an emergency out-of-hours telephone number and an answerphone service and specifies a 72hr reply to all queries.

Comment:

In this regard, this office would be of the opinion that an *immediate* response should be specified for the emergency out-of-hours phone number and not an answerphone service.

Emergency phonedlines are, by their very nature, urgent and a 3-day response will not suffice. The provision of a Bord Gais helpline to supplement the contractor-operated service should also be considered.

The information submitted does not appear to contain any reference to pest control management plan.

Comment:

Because many demolition/construction works carried out on sites which may not have been disturbed for long periods lead to migration of rodents in surrounding areas, it is recommended that a Pest Control Management Plan be devised and implemented by a competent pest control company. While it is acknowledged that the site is already monitored for rodents, rodent activity will most likely arise in the neighbouring areas on foot of the vibrations caused by remediation works.

The Specification & Drawings section also provides an implementation/verification plan detailing the liaison arrangements between the Applicants, Contractor and Licensing Authority.

This report serves to include the following comments from Dr. Tessa Greally, A/Director of Public Health, HSE Dept of Public Health:

The characterisation of the local population focuses upon the census data of those resident in the area and does not adequately reflect the busy nature of the locality in relation to educational attendance at the many educational institutions serving the whole city and environs (pre-school, primary, secondary and third level) - none of these have dedicated parking or drop-off areas which therefore involves young people of all ages walking around the area. This is added to at weekends by a number of religious /church facilities who use the area for parking – large-scale public events such as the Novena in June , matches in Limerick Gaelic Grounds and matches/concerts in Thomond Park require large-scale traffic regulation involving closure of the Shannon Bridge, with buses across river and consequent parking of large sections of the attendance around this specific area.

The submission acknowledges that odour from the waste removal process and related fugitive emissions are possible and have included a number of mitigation measures. It also details the odour measurement practices that should be in place to protect staff working on site.

In relation to the public it also indicates that 24 hour security will be provided but it is not clear whether this will be remote or on-site. The suggestion that the public information boards will include a complaints number and that a message left on the answerphone will provide a response in less than 72 hours is not sufficient.

On that basis I would like to see clarity as to how the emergency response to odour and other complaints from the public would be handled on a realtime basis and an indication that scheduling of parts of the project likely to give rise to odours would take into account patterns of heavy use of the area for major events and climatic conditions which would cause greater odour impact.

General conclusion:

Notwithstanding the information provided in the submission, the details of the contract and therefore the equipment to be used as well as the exact methods of extraction have yet to be finalized and therefore there is an element of the unknown to this project. While consultation has been had with colleagues in

Cork and Waterford, this project differs in that it involves the closed pump & treat system. The Applicants contend that this will reduce the odour complaints associated with the remediation process.

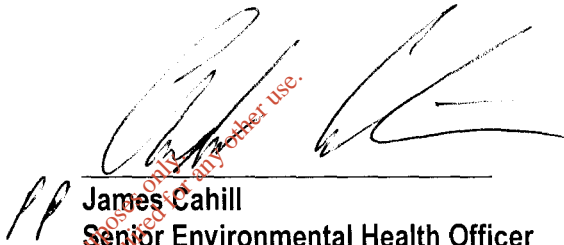
Should the project go to plan, the monitoring of air quality, odour, noise, vibration and water quality as outlined in the application will highlight problematic areas in order that mitigation measures can be introduced where appropriate. However, as with any major project such as this is, and especially in such a high-density population area, there is always the potential for unforeseen public health incidents to arise. This can be mitigated through the implementation of the public information and communication systems as described above.

Drawing on previous experience of other projects of a similar nature, it is possible that while all potential hazards may be identified in the planning stage, unforeseen hazards will also arise through the course of the project. The possibility of such events must be allowed for and response programmes should be designed in such a manner to allow them to be altered accordingly.

Yours faithfully,



Thomas Boland
Environmental Health Officer



James Cahill
Senior Environmental Health Officer

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