

SUB (8)

Environmental Health Department Health Service Executive, Dublin Mid-Leinster, Unit 7C, Lough Sheever Corporate Park, Robinstown, Mullingar, Co. Westmeath. Phone 044 9384890 Fax 044 9384889



5th December 2013

Grainne Oglesby,
Environmental Licensing Programme,
Office of Climate, Licensing and Resource,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
County Wexford,
Ireland.

ID Number: ID0081

Re: Peat harvesting operations at Camagh Bog, Co. Westmeath

Dear Sir / Madam,

Please find enclosed the HSE consultations report in relation to the above proposal.

If you have any queries regarding any of these reports, the initial contact is Mari Greene, Principal Environmental Health Officer who will refer your query to the appropriate person.

Environmental Health Report

The EH 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 7th November 2013 by the Environmental Protection Agency.
- A site visit was conducted on 26th November 2013 by Enda Coffey (Environmental Health Officer).
- Environmental Health were included at the 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 area;
 - Air Quality
 - Groundwater

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Mari Greene, Principal Environmental Health Officer.

Yours Sincerely,

Mari Greene
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HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report

Report to: Environmental Protection Agency, Office of Climate, Licensing and Resource, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford, Ireland.

Type of consultation: EIS 🗸	Scoping Screening (constr	aints) 🗆	Other
(please specify)		*	

Licensing Authority: Environmental Protection Agency

Reference Number: P0974-01

Applicant: Bulrush Horticulture Ltd.

Re: Peat harvesting operations at Camagh Bog, Co. Westmeath

1. General Introduction

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 area;

- Air Quality
- Groundwater

Air Quality

During a visit to Camagh Bog, it was noted that there has been significant tree removal to the East and North of the peat extraction area.

In section 10.2.7, the applicant states, "The nearest neighbour is approximately 150 m east of the site boundary along the minor road which forms the northern site boundary. This neighbour is screened from the site activities by a stand of woodland. The next nearest residential dwelling is approximately 200 m north of the site along a minor access road"

This office would suggest that a site specific comprehensive air survey is conducted at this location which takes into account recorded air monitoring results, nearest sensitive receptors, site screening, and all factors relevant in considering the impacts of this operation on the environment.

Groundwater

Section 9.3.7 states

GSI considers the groundwater vulnerability across the entire Camagh Bog site to be 'Low'. This reflects the peat's capacity to minimise infiltration to underlying groundwater resources. The minor amounts of groundwater contained within the peat stratum would not be considered a resource.

With the lowering of the overburden over time due to peat abstraction, the natural protection afforded to the groundwater will be reduced.

The facility operator states that (section 9.4.2), a peat layer of at least 0.5 metres in thickness will be retained at completion of the extraction operations.

The developer also states in the Remediation section of the Non-Technical summary accompanying the EIS that;

"Opportunities for rehabilitation will only begin to arise after 15 years or so, when the shallower areas are worked out. Rehabilitation offers, a platform of possibilities including forestry, agricultural use, regeneration of a heather moorland for sport and restoration of a peatland or wetland habitat through the control of the water table. It would be rash to predict the priorities which will apply in 20-25 years when decisions will have to be taken. However, the restoration concepts outlined demonstrate how the peat extraction site can be restored to woodland or heathland habitat ensuring no long term adverse impacts will arise, which we have a platform of possibilities including for sport and restoration of a peatland or wetland habitat through the control of the water table. It would be rash to predict the priorities which will apply in 20-25 years when decisions will have to be taken. However, the restoration concepts outlined demonstrate how the peat extraction site can be restored to woodland or heathland habitat ensuring no long term adverse impacts will arise.

This office queries the adequacy of the proposed overburden thickness (0.5 metres) at completion of the abstraction operations, particularly as the developer is unsure at this stage what eventual land usage is proposed for this location.

It is possible that if due caution is not exercised, groundwater (and consequently local water abstraction points) may be negatively affected by the removal of peat at this location.

* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Mari Greene, Principal Environmental Health Officer, Unit 7C Lough Sheever Corporate Park, Robinstown, Mullingar, Co. Westmeath.