Sub No. (2)

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

An tSeirbhís Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte (Iarthar)
Ceanncheathrú Naomh Muire
Caisleán an Bharraigh
Contae Mhaigh Eo

Environmental Health Service
HSE West
St. Mary's Headquarters
Castlebar
Co. Mayo

☎ (094) 90 42260 / 90 42105
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5th December 2014



Ms. Sonja Smith, (Programme Officer)
Environmental Licensing Programme,
Office Of Climate, Licensing & Resource Use,
EPA Regional Inspectorate,
Inniscarra,
County Cork.

**EPA (Industrial Emissions)(Licensing) Regulations 2013**

| | |
|---|---|
| **Applicant** | **Ballinrobe Biogas Ltd., Levalley, Ballinrobe, Co. Mayo.** |
| **Activity** | **11.1 The recovery or disposal of waste in a facility, within the meaning of the Waste Management Act, 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.** |
| **Ref No.** | **P1005-01** |



Dear Ms. Smith,

Further to your correspondence seeking comments in relation to this application, the following HSE departments were made aware of the consultation request for the proposed development on 6th November 2014.

a. Emergency Planning b. Estates c. ISA d. Health Protection

No comments were received from these departments at the time of issue of this report.

The proposed development would result in the on-site generation of 14,280 $M^3$ of pig manure to which another 11,500 $M^3$ of mixed organic material would be added giving an annual amount of approx 25,800 $M^3$ of material for processing through the biogas facility. The post process digestate would comprise 20,922 $M^3$ of liquid digestate and 2325 $M^3$ of fibrous/solid digestate for removal off site.

I would like to bring the following to your attention for your consideration in relation to information presented in the application

## 1./ Importation of organic material onto the site

Little information is given in the application as to the origin of some of this material and controls over the quality of this material. Difficulties might arise in relation to:

Fat Trap Waste (200 Tonnes):

From where is this material to be sourced? Fat trap waste originating from an uncontrolled source may have other material and contaminants therein. How will this material behave in the biogas facility? Will it re-congeal as fat to be disposed of with the fiberous digestate or is there a separate waste stream envisaged? Is this a suitable material for use in the proposed biogas facility?

Household Residue 100 (Tonnes) & Vegetable Waste (500 Tonnes):

What exactly is this material to comprise of and from where is this material to be sourced? What controls are proposed to ensure material does not contain other materials/contaminants that would compromise the nature of the final process digestate?



## 2./ Traffic Movements to Service the Site.

Movement of liquid digestate off-site.

Using data provided in the report, 20,922 $M^3$ of liquid digestate will be produced for land spreading. Utilising tankers with a capacity of 15.5 $M^3$, some 1,350 tanker loads would be required to remove this, equating to 35 loads per week in the maximum 39 week spreading season. The table in the EIS refers to this being carried out in 10 weekly units.

Movement of Fibrous Digestate off-site.

The fibrous digestate is unsuitable for land-spreading on grassland and it is planned to remove this material off site "for supply to a nursery, garden centre, or to fertilise an agricultural crop with high P demand, such as beet or maize". No details are given in the EIS as to this process equivalent to the management of the liquid digestate and no firm commitments are in place from anyone to receive this material.

The 2325 $M^3$ of fibrous digestate is to be removed in 25 tonne lorryloads (93 loads per Year). Figures in the second table of section 6.9 are unclear in this regard.

## 3./ Noise

The noise monitoring surveys submitted in the EIS, amount to 2 half hour monitoring periods on the morning of 13th April 2011 at 2 locations in the vicinity of the existing operation. Very little information is given in relation to noise and little can be determined from the information presented. No information is presented as to noise potential from mechanised filling/emptying of silos and tanks. The EIS simply states that noise sources will be pigs at feeding time, deliveries of organic material and collection of liquid digestate.

No assessment of noise being a potential problem during the demolition and construction stages has been presented.

## 4./ Pest Control

The practice of storing carcasses in outdoor containers pending infrequent removal to rendering plants can attract pests that have the potential to impair or interfere with amenities or the environment at the proposed installation or beyond the site boundaries at neighbouring lands/properties. Full details of pest prevention and controls should be submitted by the applicant.



## 5./ Movement of Manure to Biogas Plant

Site plan drawings 1 & 2 indicate that manure from the pig units is to be transferred to the biogas plant via 100mm Class C PVC pipe. What measures and checks are to be put in place to guard against leakages from this pipe to ground? Is the system gravity fed or pumped? What contingency is there in the event of pump failure or damage to pipe?

## 6./ Odour Control (on-site)

Current control measures are listed in sections 3.4.3 and 6.5 of the EIS and these controls are likely to extend to the enlarged production capacity. Specific provisions are detailed in section 6.5 in relation to the biomass reception area. Could the applicant be asked to clarify if it is necessary to maintain negative pressure in this building full time "during ordinary operation" or only around times of reception and handling of imported biomass materials and to ensure there are no potential problems with odour emissions from this building?

**7./ Storage of fibrous digestate prior to removal.**

Is fibrous digestate likely to emit gaseous odours in storage and more notably during transfer to haulage trucks? How long may fibrous digestate be stored in the fibre store? Will length of storage have any effect on odourous emissions when material is disturbed? What is the capacity in this store for fibrous digestate storage?

**8./ Odour Control (customer farmlands)**

Section 6.5 implies land spreading will be by low trajectory splash plate or by band spreader, to minimise aerosol formation and dispersion, however in section 3.7 it is apparent that the only equipment in use and proposed for use is the low trajectory splash plate.

Yours Sincerely,

Catherine Cosgrove PEHO