



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Services

HSE Dublin North East
1st Floor, Old St. Mary's Hospital
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25th March 2015

Ms. Grainne Oglesby,
Environmental Licensing Programme,
Office of Climate, Licensing and Resource Use,
Environmental Protection Agency,
Headquarters, P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.

Re: Tom Roes Point Port Terminal, Baltray Road, Drogheda, Co. Louth

Class and Nature of Activity: 11.4(b): Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): (ii) pre-treatment of waste for incineration or co-incineration.

Applicant: Drogheda Port Company, Harbourville, Mornington Road, Drogheda, Co. Meath

Reference Number: P1011-01

EHIS Ref: 0298

Dear Ms. Oglesby,

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

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

The following HSE departments were made aware of the consultation request for the proposed development on the 2nd March 2015:

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher, Estates Manager – Environmental Services
- Assistant National Director for Health Protection – Kevin Kelleher/Marie Woods
- ISA Manager – Dermot

The Environmental Health service response to the application is in the attached consultation report. The report was compiled based on the following:


- The assessment of documentation submitted to this office on the 2nd March 2015.
- The documentation on the EPA website.
- A site visit on the 18th March 2015.
- Consultation with the Environment Section of Louth County Council.

No additional information was requested or provided.

This report refers only to those sections of the documents which are relevant to the HSE.

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Tara Woods, Principal Environmental Health Officer at the above address.

Yours sincerely,



Tara Woods

A/Principal Environmental Health Officer

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IEL REPORT

Environmental Health Service Consultation Report

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

Report to:

Tara Woods, A/PEHO,
H.S.E. Dublin North East,
1st Floor, Old St. Mary's Hospital,
Dublin Road,
Drogheda,
Co. Louth.

Date:

25th March 2015

Type of consultation:

EIS Scoping Screening (constraints) ☐
Other (please specify): EPA Licence consultation

Reference Number:

Our ID: 0298

EPA Ref No. P1011-01

Reason for Report:

The application of an EPA Industrial Emissions Licence for the set down of Baled SRF and RDF at Tom Roes Point, Drogheda, Co. Louth and to increase throughput to 500,000tonnes.

Name & Address of Applicant

Drogheda Port Company, Harbourville, Mornington Road, Drogheda, Co. Meath

Location of Facility

Tom Roes Point Port Terminal, Baltray Road, Drogheda, Co. Louth

Class and Nature of the Activity:

11.4(b): Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): (ii) pre-treatment of waste for incineration or co-incineration.

General Introduction:

This office is concerned primarily with highlighting issues of public health/environmental health concern. In this regard all documents and accompanying data have been reviewed taking into consideration the following specific environmental health areas: human beings, water, noise, air including dust and odour, and pest control.

The activity involves the set down of baled solid recovered fuel and refuse derived fuel pending loading to cargo ships and exporting to destinations on the continent.

There was no residential housing located around the facility.

A site visit was carried out by myself on the 18th March 2015. The contact person during this visit was Captain Martin Donnelly, Harbour Master. At the time of the visit, the facility appeared to be well maintained and tidy. There was no detectable offensive odour outside the perimeter of the waste facility; however, there was a slight offensive odour within the facility. The waste facility currently operates with significant control techniques and has mitigation measures in place to ensure that all site activities have no adverse impact on the local environment. The waste permit imposes stringent conditions and regulates how the facility is operated.

The facility is entirely surfaced and hard paved with a dense concrete or densophalt. There are no dangerous substances stored on site.

Pest Control

Good housekeeping is practiced on site and there was no evidence of rodents, flies or birds at the time of my visit.

- I was informed that an ad hoc rodent control takes place on site, whereby bait is placed on site at various locations and is monitored.

Recommendation: A more formal, documented pest control programme should be put in place with frequent and regular inspections carried out by a competent person.

- I was informed that a company called KC Environmental are employed to monitor the facility and tape up damaged bales. At the time of my visit a number of the bales were damaged and had not been taped up or had not been adequately taped.

Recommendation: A better monitoring system should be established to ensure that damaged bales are appropriately taped up in a timely fashion to prevent creating a potential public health nuisance.

Water

The water supply to the facility is from the public water supply.

Foul Waste

The foul waste from the staff sanitary accommodation is directed to a septic tank to the left of the facility. There were no apparent issues observed at the time of my site visit.

Run-Off

At present the only physical emission from the facility is run-off which is collected and discharged to the public combined sewer. AWN Consulting Limited, consultants for the applicant are currently making a submission to Irish Water via Louth County Council to collect all run-off and pump and pipe it to the Drogheda Sewage Treatment Plant. I was informed that there is an agreement in principle to this with Louth County Council at present; however, it is not finalised.

Noise

Due to the increase tonnage per annum of baled RDF and SRF at the facility, minor additional noise emissions are anticipated; however, they will be no more than the activities carried out elsewhere in the port.

Emissions to Air including Dust

The operation of the facility has no significant impact on air quality. As no waste processing is carried out at site, the only potential source of emissions are dust, vehicle exhausts and odours.

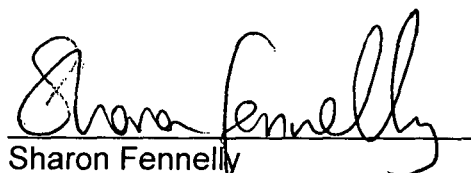
Dust did not appear to be a major issue at the time of my site visit and monitoring that occurred between 2012 and 2014 concur with that.

There are no sensitive receptors to odour at this location. From research carried out by AWN Consulting Limited, it was found that the odour impact of the baled/wrapped SRF and RDF waste is significantly less than the odour guideline value at the nearest sensitive receptor.

Conclusions:

It is the opinion of the Environmental Health Department that the document submitted for the Industrial Emissions Licence addresses the above mentioned areas and has no further comments on this application except the above mentioned recommendations.

Yours sincerely,



Sharon Fennelly
Environmental Health Officer