



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

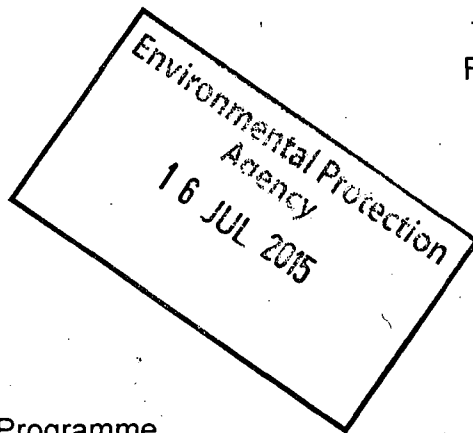
Environmental Health Service  
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Ref/ IMcC/CO'D

15 July 2015

Ms Dorota Richards  
Programme Officer  
Environmental Licensing Programme  
Office of Climate, Licencing & Resource Use  
Environmental Protection Agency Headquarters  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford



Re: Application for Integrated Pollution Prevention and Control License review.

Class and Nature of Activity: Class 5.12(h) – The production of organic chemicals such as: (h) plastic materials (polymers, synthetic fibres and cellulose-based fibres)

Applicant: Kingspan Insulation Limited, Bree, Castleblayney, Co. Monaghan.

Ref. No: P0057-03

EHIS Ref: 0333

Dear Ms Richards,

Please find enclosed the Health Service Executive consultation report in relation to the above application.

If you have any queries regarding the report, the initial contact is Ms Claire O'Dwyer, A/Principal Environmental Health Officer.


The following HSE departments were made aware of the consultation request for the above application on 16 June 2015:

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- CHO

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

- A site visit during the scoping assessment on 25 May 2015.
- An assessment of documentation submitted to this office.
- EPA guidance documents.
- No additional investigations / measurements were undertaken.
- All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.
- This report refers only to those sections of the documents which are relevant to the Health Service Executive.

Yours sincerely,



**Claire O'Dwyer**  
**A/Principal Environmental Health Officer**

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15 July 2015

Ms. Claire O'Dwyer  
A/Principal Environmental Health Officer  
Environmental Health Office  
The Arcade  
Main Street  
Cavan  
Co. Cavan

**Re: Application for Integrated Pollution Prevention and Control License review.**

**Class and Nature of Activity: Class 5.12(h) – The production of organic chemicals such as: (h) plastic materials (polymers, synthetic fibres and cellulose-based fibres)**

**Applicant: Kingspan Insulation Limited, Bree, Castleblayney, Co. Monaghan.**

**Ref. No: P0057-03      EHIS Ref: 0333**

Dear Claire,

I refer to the recent submission of an application for an IPPCL review from Kingspan Insulation Ltd. The following are observations and comments made whilst reviewing the said application, EIA and related documents in conjunction with EPA guidance documents and associated legislation.

#### Introduction

Seven amendments to the current license are proposed, with the main one being the Proposal to install a Regenerative Thermal Oxidiser (RTO) which is anticipated to remove 99% of VOC emissions to air from the insulation manufacturing plant. The EIS states that "The removal of VOCs through the installation of a suitable VOC abatement unit is required in order to reduce emissions from the facility and ensure compliance with the current IE licence".

Civil engineering works will be carried out in the summer and autumn of 2015 with installation and commissioning of the thermal oxidiser towards the end of 2015. The RTO is expected to be operational by the start of 2016.

### Scoping

The HSE were consulted during the scoping process recently and discussions during the site visit on 25/5/15 as part of the scoping request highlighted no significant concerns at that time. Following review of this application and EIS, the following observations and comments have been made;

### Construction phase

The EIS states that "during the construction phase, the potential release of contaminants from construction machinery or concrete/cement run-off has the potential to impact on local water quality but the extensive hard-standing areas at the site mean that spills will be captured by the site surface water drainage network via the interceptors". It is noted in Attachment E.2.1., that there are 5 Surface water discharge points. SW1 and SW2 contain interceptors conforming to I.S EN 858-2:2003. It is unclear if SW3, SW4 and SW5 contain interceptors and if they will be receiving water from the area where the construction of the proposed RTO is located. According to Figure B2.7, SW5 is the closest to the proposed construction area.

The construction will be carried out on an existing concreted ground area alongside the existing building. Due to the foot print of the construction area pest control issues are not likely. Pest control monitoring should focus on this area while the construction phase is ongoing.

The existing waste management procedures and contractors will be used to deal with the construction waste.

Mitigation measures should be fully complied with to prevent a dust nuisance occurring.

Mitigation measures should be fully complied with to prevent noise nuisance occurring.

### Effluent

The EIS states that "The RTO will generate a new saline effluent, which will go to the Castleblayney wastewater treatment along with the current domestic waste water /effluent. Irish Water have evaluated an application and confirmed acceptance of the effluent, thereby confirming the effluent will not impact the treatment capability of the treatment process and that subsequent discharge from their facility will not impact Lough Muckno". The EIS has acknowledged that the WFD risk score for the lough Muckno is '1b' which means it is '*at risk of not achieving good status*' by 2015.

Attachment A, Table 1 predicts there will be ca. 3 tonne of chloride salt released into the sewer from the RTO per year.

Section F2.2 states that a "new sampling point where the RTO saline effluent discharges on site will be installed". This should be monitored at an appropriate frequency.

Correct storage and usage of chemicals must be maintained at all times to prevent spillages entering the waste water system.

#### Air

Section A.1.10.1 states "An exceedance of the air quality standard for formaldehyde is predicted beyond the site boundary if emissions occur at levels currently stated within the Industrial Emissions licence (register P0057-02). Typical emissions are well below permitted emission limits and a new mass emission limit for formaldehyde is proposed (reducing from 2.7kg/hr to 1.2 kg/hr for current operation hours and a further reduction to 0.9 kg/hr if continuous 24 hour, 5 days a week operation commences)".

Section A.1.10.1 states that the "RTO is predicted to have a positive impact on air quality, without significant release of greenhouse gases associated with energy used to run the RTO".

Attachment F.1. states that Low concentrations of oxides of nitrogen and carbon monoxide will be emitted from the thermal oxidation process.

It is recommended that air monitoring be carried out on the new RTO emission point and on the amended emissions point when they become operational to verify the predicted air emissions.

This office has not received any air/odour complaints regarding this facility.

#### Noise

Section A1.15.3 states that "a new noise monitoring location is proposed to record ambient noise levels to the west of the facility as a check on noise levels following the installation of the new RTO unit".

Vibration from the manufacturing facility and the proposed RTO do not appear to be an issue.

This office has not received any noise complaints regarding this facility.

#### Ground Water

Bore holes drilled as part of the EIA process for the soil and water baseline confirm that there is no evidence of significant impact from the use of this site previously by a Print Works and since 1981 as Kingspan.

It is recommended that sampling of ground water is conducted at an appropriate frequency.

#### Surface Water

Section D1.6.3 states that "runoff from the buildings and roadways is collected in surface water drains and discharged to public stormwater drain from one of 3 discharge points. Process area discharges (2) pass through an oil interceptor conforming with IS EN 858-2:2003 requirements. A third discharge from the office and front car parking areas passes direct to public drain. Containment through bunds and sumps is available for all chemical delivery and bulk chemical storage facilities to prevent unplanned discharges of chemicals to storm drain.

All discharge points are fitted with shut-off valves and full retention of firewater will be available onsite following the introduction of minor engineering works. The introduction of the RTO will not modify surface water flows or composition".

Energy Supply

"A 250 KVA emergency generator is present onsite to support critical systems in the event of grid supply interruption (life safety systems or LSS). The generator does not supply electricity to the main production processes which shuts down in the event of grid supply interruption".

At this time the HSE has no other concerns provided that all mitigation measures for the construction and operational phases are implemented in full and that license limits are complied with in full.

Yours faithfully,

Irene McCabe.

Irene McCabe  
Environmental Health Officer

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