



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 3

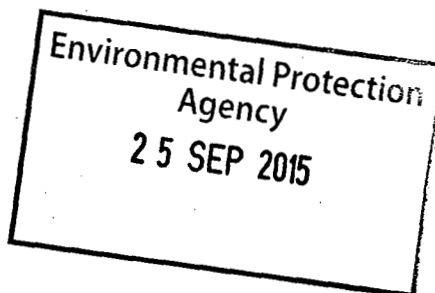
Environmental Health Services

HSE Dublin North East
Rampart Road
Dundalk, Co. Louth

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22nd September 2015

Ms. Ana Bolger,
Programme Officer,
Environmental Licensing Programme,
Office of Climate, Licensing, Research and Resource Use,
EPA Headquarters,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Re: EIS with an Industrial Emissions Licence Application in respect of O'Hanlon & Sons Contractors Ltd. for an installation located at Browns Quay & Connick Quay, Lockington's Yard, Quay Street, Dundalk, Co. Louth.

Proposed Development: Applicant is seeking a Licence for its existing baled waste storage facility at Lockington's Yard, Quay St., Dundalk, Co. Louth.

Dear Ms. Bolger,

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

If you have any queries regarding the report, 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 21st August 2015.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher, Estates Manager – Environmental Services
- Assistant National Director for Health protection – Kevin Kelleher/Marie Woods
- CHO – Pat Bennett

Environmental Health (EH) Report

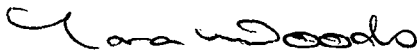
The EH service response to the proposal is in the attached consultation report.

- The assessment is based on an assessment of documentation on the EPA website.
- A site visit was conducted on the 4th February 2015 by Environmental Health Officers Ms. Sharon Fennelly and Ms. Mariesa Rushe. The contact person during the site visit was Mr. Sean O'Hanlon. This was for the original Industrial Emissions Licence application.

- Additional Information was provided on the 16th September 2015 by Mr. Jim O'Callaghan, O'Callaghan Moran & Associates, Environmental & Hydrogeological Consultants.
- Environmental Health were not included at the Screening/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 areas:
Odour
Pest control

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
Principal Environmental Health Officer

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HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000,
& Regulations made there under).

Report to:

Tara Woods, PEHO,
H.S.E. Dublin North East,
Environmental Health,
The Ramparts,
Dundalk,
Co. Louth.

Type of consultation: EIS ☒ Scoping ☐ Screening (constraints) ☐ Other
(please specify) _____

Reference Number:

Reg No. P1007/01

EHIS Ref: 0365

Applicant: O'Hanlon & Sons Contractors Ltd., Georges Quay, Dundalk, Co. Louth.

Proposed Development: Applicant is seeking an Industrial Emissions Licence for its existing baled waste storage facility at Lockington's Yard, Quay Street, Dundalk, Co. Louth.

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 reviewed all areas specific to EH such as water, noise, emissions to air including dust and odour etc. and have made observations and submissions on odour and pest control.

The facility currently operates under a Waste Permit issued by Louth County Council. It stores baled waste at the site pending shipment for use as fuel overseas to energy plants and cement kilns. The waste materials are baled prior to arrival in multiple layers of polythene sheeting. At the time of our visit to the facility it appeared to be well maintained and tidy and there was no detectable offensive odour outside the perimeter of the waste facility site.

There have been no complaints received by this department to date and after contacting Louth County Council in February 2015, they advised that they have received few complaints.

Observations:

Odour

The main complaint on record for this facility was an odour complaint as a result of very dry weather and the fact that the ship was unable to berth at the port. The incident was addressed and the company have developed a policy if such an event should occur in the future. They have referred to this in the EIS. There was no issue with odour during our site visit as mentioned above.

Pest Control

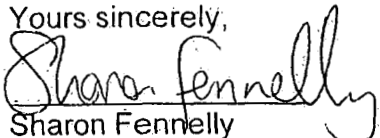
We were advised during our site visit that good housekeeping is practiced on site and there was no evidence of rodents, flies or birds at the time of our visit.

- We were informed that an ad hoc rodent control takes place on site, whereby bait is placed on site at various locations and is monitored. There was no reference to how pests are monitored and controlled in the EIS or Waste Permit Application.
- I received an 'Environmental Nuisance Control Programme' 'Procedure No. 4' 'Date of Issue 11/9/2015' from the consultants O'Callaghan Moran & Associates on my request, which describes the environmental nuisance inspection control measures for the Company. It details how they do a daily inspection for vermin and if vermin are identified, the Site Manager will arrange for a specialist pest control company (Dundalk Pest Control) to visit the site and take appropriate action. However, there is no mention of monitoring bait points in 'Procedure No. 4'.

Conclusions:

It is the opinion of the Environmental Health Department that the EIS submitted for the Application of an Industrial Emissions Licence addresses EH concerns over water, noise, emissions to air including dust and odour however, it does not fully address the potential public health nuisance of pest control. They need to detail 'Procedure No. 4' in their EIS.

Yours sincerely,



Sharon Fennelly
Environmental Health Officer

*** 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.**