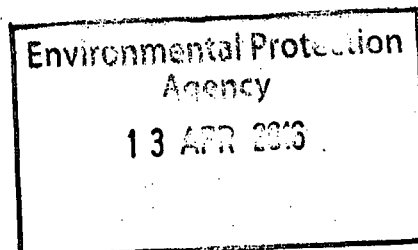




Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Subm No. 1
Environmental Health Service
Primary, Community & Continuing Care
HSE West
St. Mary's Headquarters
Castlebar
Co. Mayo
(094) 90 42260 / 90 42105
(094) 90 27312



12th April 2016

Ms. Liz Leacy (Programme Officer),
Environment Licensing Programme,
EPA Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.

EPA Ref. No: P1037-01

HSE/EHIS Ref: 447

Class and Nature of Activity: Waste (recovery or disposal in a facility connected or associated with an I.P.P.C. activity).

Applicant: Mr. John Sheridan, Levally, Ballinrobe, Co Mayo.

Location of Facility: Levally, Ballinrobe, Co Mayo.

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 4th March 2016.

a. Emergency Planning	b. Estates	c. C.H.O.	d. Health Protection
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No comments were received from these departments at the time of issue of this report.

The proposed development would utilise 14,280 M³ of pig manure to which another 11,500 M³ of mixed organic material would be added giving an annual amount of approx 25,800 M³ of material for processing through the biogas facility. The post process digestate would comprise 20,922 M³ of liquid digestate and 2325 M³ 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.

The EIS submitted with this application (and shared with other associated applications) is a revision from April 2012. A more recent revision (July 2013) of this same EIS has been presented with a related application, P0973.

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 fibrous 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 Fibrous Digestate off-site

The 2325 M³ 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. This activity has been omitted from the traffic calculation in the Post Development traffic projections (Appendix 14 Traffic Report, Section 4.2.1, Table 2)

3./ Noise

The noise monitoring surveys submitted in the EIS, relate to 2 half hour monitoring periods on the morning of 13th April 2011 at 2 locations in the vicinity of the existing operation. Further noise monitoring was carried out in August 2015 and submitted as part of information relation to an associated application, (P0981-01) though not referred to in this application.

4./ Movement of Manure to Biogas Plant

Information submitted including site plan drawings indicate that manure from the pig units is to be transferred to the biogas homogenising tank via 100mm Class C ABS pipe. Is the system gravity fed or pumped? What contingency is there in the event of pump failure or damage to pipe? BAT documentation (BAT 55 Attachment I) submitted, implies the pipe is to be above ground. What measures and checks are to be put in place to guard against damage/leakages from this pipe to ground?

5./ Odour Control (on-site)

Specific provisions are detailed in section 6.5 of the EIS in relation to the biomass reception area. Could the applicant be asked to clarify if it is necessary to maintain negative pressure "during ordinary operation" (Application Form, Attachment F- Odour Emissions) in this building full time 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 as this is not clear from the submission?

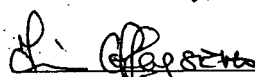
6./ Storage of Fibrous Digestate Prior to Removal.

Is fibrous digestate likely to emit gaseous odours in storage and more notably when disturbed such as 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?

The fibrous digestate is stated to be 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. NRG Ltd. have conducted a feasibility study into the potential for the recovery of the fibrous digestate from the proposed Anaerobic Digester as submitted in an associated application (P0981-01, Attachment 5, sub-attachment 1) in March 2016 though this does not appear to have been included in this application. Many of these potential uses for the solid digestate require further handling/processing/drying and there is no indication as to where any such activity would be carried out.

"The options for the fibrous portion are currently being investigated by NRG Ltd. through a feasibility study. A final decision will be made when all possibilities have been assessed to determine which the best practice for this proposed facility is and which has the best potential to generate income."

Yours sincerely,


 Catherine Cosgrove,

Principal Environmental Health Officer

CCMK