

Subm188107 No. 1



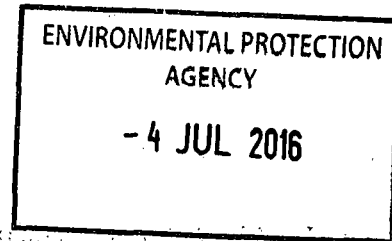
Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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28th June 2016

Ms Noeleen Keavey
Programme Officer
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Headquarters PO Box 3000
Johnstown Castle Estate
Wexford



Re: P0811-02

Applicant: Dunbia (Slane), Greenhills, Beauparc, Navan, County Meath

Activity: 7.4.1: The operation of slaughter houses with a carcase production capacity greater than 50 tonnes per day.

Dear Ms Keavey

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

If you have any queries regarding any of these reports, the initial contact is Ms Elish O'Reilly, 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 licence review on 10th June 2016.

- Emergency Planning
- Estates
- HSE Health Protection

Environmental Health Report

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

The report is based on an assessment of documentation submitted to this office on 9th June 2016 and a site visit conducted on 21st June 2016. The contact people during the site visit were Mr Denver Willis, Group Environment & Efficiency Manager, Ms Victoria Kerr, Senior Group Environmental Officer, Mr Darragh O'Connor, Dunbia (Slane) Environmental Officer and Mr Liam Dempsey, Factory Manager.

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.

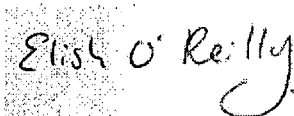
This report refers only to those sections of the documents which are relevant to the HSE.

We have made submissions under the following specific areas appropriate:

- Water/Hydrology/Hydrogeology
- Air Quality
- Noise
- Waste

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms Elish O'Reilly, Principal Environmental Health Officer, Co Clinic, Navan, Co Meath.

Yours sincerely



Elish O'Reilly
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,
& Regs made thereunder).*

Report to: Environmental Protection Agency, Headquarters, PO Box 3000,
Johnstown Castle Estate, County Wexford Ireland

Type of consultation: Environmental Impact Statement

Licensing Authority: Environmental Protection Agency

Reference Number: P0811-02

Applicant: Dunbia (Slane), Greenhills, Beauparc, Navan, Co Meath

Proposed Development: IED Licence review as a result of recent planning approval to intensify operations and to make other ancillary changes at the site.

HSE EIS Submission Report

1. General Introduction

We refer to the submission of an EIS from Dunbia (Slane), Greenhills, Beauparc, Navan, Co Meath regarding an application to review the IED licence at Dunbia (Slane), Greenhills, Beauparc, Navan, Co Meath. This application was received by the Environmental Protection Agency on the 25th May 2016 and referred to the Environmental Health Services on 9th June 2016.

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.

The documentation submitted was reviewed having regard to the following specific Environmental Health areas.

- Water
- Air Quality
- Noise
- Waste

2. Assessment of Principle & Description of the Project:

A licence review application has been submitted to the EPA by the above applicant as a result of planning approval to intensify operations, increasing kill number from 200 to 350 animals per day and other ancillary structural changes, including the construction additional lairage facilities and a green offal processing room.

3. Assessment of Later Consents Required:

The EIS does not refer to any further consent that relate to this site.

4. Assessment of Public Consultation & Non Technical Summary:

At the time of assessment there was no information regarding feedback from the neighbouring residents with regards to this application.

The non-technical summary describes the development adequately in non-technical language.

5. Assessment of Consideration of Alternatives:

As this application relates to a development already in existence and is accompanied by an EIS the consideration of alternatives is not relevant at this time.

6. Assessment of Description of Physical Environment:

The physical environment is adequately described in the EIS.

Comments:

The following observations were made following the review of the application, EIS and related documentation in conjunction with EPA guidance documents and associated legislation.

A site visit was carried out on 21st June 2016 at 10 am. At this time we met with Mr Denver Willis, Group Environment & Efficiency Manager, Ms Victoria Kerr, Senior Group Environmental Officer, Mr Darragh O'Connor, Dunbia (Slane) Environmental Officer and Mr Liam Dempsey, Factory Manager. Consultation with Andrew Sulley SEHO took place on the 27th June 2016.

1.0 Hydrology & Hydrogeology

Water and hydrology is described in Section 6 in the EIS. An assessment of the hydrological and hydrogeological conditions on site was conducted. This assessment gives a clear description of the Hydrogeology and Hydrology within the application area.

1.1 Water Supply

There will be an increase in ground water supply required for the intensification of activities on site. This will be met by the three existing private wells on site. All water supplied by the private wells is chlorinated and the treatment system is maintained by an external contractor, Aquachem. Rainwater harvesting and rainwater holding tanks were noted during our site visit. These will supplement the groundwater supply requirements. The EIS states that there will be no impact on groundwater supplies in the immediate area.

1.2 Waste Water

All surface water run-off from building roofs and paved 'clean' yard areas around the plant (free of potential fouling by cattle and away from waste handling and storage areas) is collected by a storm water drainage system and treated prior to its discharge off site. This is managed and controlled by the existing IED Licence.

All wastewater arising at the plant is collected in an underground slatted effluent tank at the south-western corner of the plant and pumped from there to wastewater storage lagoons prior to being tankered off site to municipal wastewater treatment plants. A treatment facility using Dissolved Air Floatation has been recently installed, which treats the water between lagoon storage. At the time of our visit we observed the contractor, Boyne Waste removing waste water from the site.

Following in an incident on 4th March 2016 (EPA Ref No. INCI009773) the onsite infrastructure was investigated and recommendations for all necessary upgrading carried out.

Evidence of recent corrective work carried out to the drainage system was noted during our site visit.

2.0 Waste

In general waste generation and disposal were dealt with adequately in the application however in relation to Animal By Product Waste we wish to make the following observations.

There was a lack of clarity in the EIS submitted in relation to Category 2 waste.

- The non technical summary refers to Category 2 waste being sent off site for recovery at an authorised waste facility.
- Attachment H2 of the EIS which details waste handling on site does not refer to the generation or disposal of Category 2 waste.
- Attachment H1 of the EIS refers to the storage of Category 2 waste (bellygrass) in a sealed trailer on site.
- At the time of inspection however we observed that bellygrass was stored in an open trailer which was being accessed by birds.

3.0 Air Quality

3.1 Odour

At the time of our site visit, the facility was fully operational and we did not detect any perceptible odour.

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

3.2 Dust

Specific dust control measures are in place. We observed truck washing in progress at the time of the site visit. We did however observe dried mud tracks on the main roadway outside the facility. It was clear that the tracks were made by vehicles leaving the facility.

4.0 Noise

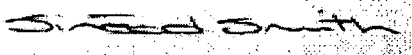
It is proposed to continue to implement existing noise mitigation measures. At the time of our visit the lairage pens were full and we noted that there were no animal noise nor was there audible noise from the operation of the slaughtering facility.

Conclusion:

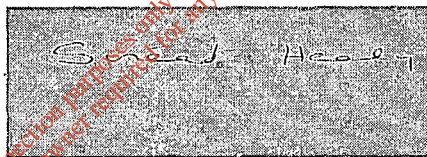
Having considered the documentation submitted, this Department wishes to make the following comments:

- Clarification is required regarding the generation, storage and disposal of Category 2 waste.
- All dust mitigation measures should be consistently implemented to ensure that build up of dried matter does not occur within the vicinity of the site.

Yours sincerely



Sinead Smith
Environmental Health Officer



Sinead Healy
Environmental Health Officer

*All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Elish O'Reilly, Principal Environmental Health Officer, Co. Clinic, Navan, Co. Meath.

c.c. Elish O'Reilly, PEHO, Co. Clinic, Navan Co. Meath.