



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Submission No. 1

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
18 The Grange
Plantation Walk
Monaghan
Co. Monaghan



Tel No: +353 (0) 47-30906
Fax No: +353 (0) 47-62678

29th June 2016

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



Re: Application for Industrial Emissions License Review.

Class and Nature of Activity: 10.2, 11.1, 11.3, 11.6

Applicant: Quinn Cement Limited, Scotchtown, Ballyconnell, County Cavan.

Ref. No: P0378-03 EHIS Ref: 0481

Dear Ms Keavey,

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, Principal Environmental Health Officer.

The following HSE departments were made aware of the consultation request for the above application on 31th May 2016.

- Emergency Planning
- Estates

- Assistant National Director for Health Protection
- CHO Manager

The Environmental Health service response to the application is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office.
- A site visit was conducted on 14th June 2016.
- Environmental Health was 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.

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Ms. Claire O'Dwyer, Principal Environmental Health Officer.

Yours sincerely,



Claire O'Dwyer
Principal Environmental Health Officer

For inspection purposes only.
Consent of copyright owner required for any other use



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
18 The Grange
Plantation Walk
Monaghan
Co Monaghan

Tel No: +353 (0) 47-30906
Fax No: +353 (0) 47-62678

29th June 2016

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



Re: Application for Industrial Emissions License Review.

Class and Nature of Activity: 10.2, 11.1, 11.3, 11.6

Applicant: Quinn Cement Limited, Scotchtown, Ballyconnell, County Cavan.

Ref. No: P0378-03 EHIS Ref: 0481

Dear Claire,

I refer to the recent submission of an application for an Industrial Emissions license review to the EPA from Quinn Cement Limited, Scotchtown, Ballyconnell, County Cavan. This is a cement manufacturing facility operational since 2000. The License application was submitted to the EPA on the 20 May 2016 and is accompanied by an EIS.

An application for review of a licence is being made to increase the range and quantity of alternative fuels and alternative raw materials for use at the facility. The review is also required in order that the facility complies with the requirements of the Commission Implementing Decision of 26 March 2013 establishing the best available techniques (BAT) conclusions under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions for the production of cement.

The aim of increasing the range of alternative fuels and alternative raw materials used at the plant is to improve the sustainability of the Ballyconnell cement plant, through the use of an increased range of waste derived alternative raw materials and fuels with the long term aim of displacing almost all fossil fuels at the plant (a limited proportion of fossil fuels will be required during process start up and for process optimisation/stabilisation). The use of these alternatives will equate to 300,000 tonnes per annum at maximum substitution.

A Planning application Ref:16/230 was submitted to Cavan County Council on 13th May 2016 in conjunction with this license review to construct infrastructure to incorporate the

use of an extended range of alternative fuels and raw materials at the plant. The planning includes new structures and physical engineering alterations to the plant.

The following are observations made whilst reviewing the said application, EIS and related documents in conjunction with EPA guidance documents and associated Legislation. Further observations were made during the site visit and discussions with Quinn Cement Ltd. on the 14th June 2016.

Soiled Water

Water is used within the cement production process at the Ballyconnell facility, however, no process wastewater is generated by the site for discharge by sewer. Process water is either reused within a closed cooling system or discharged to the atmosphere in the flue gases as water vapour.

Domestic Sewage is disposed through the main public sewage network and there are/will not be any onsite sewage treatment systems associated with this facility.

The proposed change in the operating process of the Ballyconnell facility to reflect the additional alternative fuels and alternative raw materials is not expected to result in any process related effluent being discharged via the sewer.

Surface Water

Surface water emissions from the site occur as a result of routine wash-down processes and also as a result of storm water. There is one storm water discharge point for this site. The EIS states that all surface water flow is directed into a settlement tank which is currently the Best Available Technique (BAT). Emissions limits to surface waters are regulated by the existing EPA license and as the Quinn Cement Ballyconnell facility has illustrated annual compliance of their discharge consent limits to surface water it was not considered necessary to proceed to an evaluation of the existing abatement / treatment system.

This will continue to be the same discharge point after any building works are completed as new buildings will be connected up and discharge through this existing discharge point. It is not considered that there are to be any new emissions to surface water resulting from the proposed development.

The Applicant is proposing to use the water discharged from the settlement tanks for the cement manufacturing process, which would reduce the discharge rate to the Woodford River. The water from the settlement tanks will be recycled back into the cement manufacturing process through a proposed Surface Water Recycling Tank (SWRT), thereby reducing the process water requirements from on-site boreholes.

The planning application has included 1 No. fire water retention tank.

Ground Water

There are currently no emissions to ground as part of the operational activity at the Quinn Cement facility. It is not considered that there are to be any new ground emissions resulting from the proposed changes to the facility and the application for a new licence.

Monitoring Boreholes on site include BH-02, BH-03, BH-04, BH-05 and P05-6. BH-02, BH-03, BH-04 and BH-05 are peripheral wells, drilled in agreement with the Agency as part of the study informing the "Hydrogeological Assessment Report" completed by Verdé under P0378-02 licence conditions; and P05-06 is an upstream location (replacing BH-01, which has collapsed).

The EIS states that there will be no change in the demand for water; the pre-existing abstraction rate will be reduced in the context of the surface water re-use proposal; therefore, the current status of neighbouring supplies should be protected. The current schedule of monitoring of groundwater level within these boreholes will be continued to confirm this assessment.

Water Supply

The drinking water onsite is supplied by the Public Water Supply. There are two abstraction boreholes (GW-1 and GW-2), which supply the raw water requirement (cooling water, process water and dust suppression) for the cement manufacturing process; and a separate abstraction well for the lorry wash.

Waste

In the Application, TABLE H.3(i): *Generation of waste at the installation and its management*, lists the types, source, quantities and method of disposal of wastes from this facility. There are currently no on-site waste disposal practices undertaken as part of the operational activity at the Quinn Cement facility. It is not considered that there are to be any new on-site waste disposal practices undertaken as a result of the proposed development.

Pest Control

Pest control measures are carried out on site by a contractor.

Air

Air emissions from the facility are currently regulated by the EPA License P0378-02. There are various abatement in use including bag filters used for removing particles from dust laden exhaust air at the major atmospheric emission points A2-03 and A2-04. Smaller bag filters are used at minor atmospheric emission points, except on boilers, to prevent fugitive dust emissions occurring during transportation of materials between the various unit operations. There was one minor exceedance for dust on A2-01 reported as an incident to EPA on 22/06/2015.

The application states that a derogation from the stated BATC SO₂ ELV for A2-01 is being applied for within this IE Licence application. This is due to the amount of pyritic sulphur contained within the raw materials. The 2015 average value for SO₂ is below the BAT higher level range of 400 mg/Nm³ for SO₂. However, it should be noted this average value for 2015 (95.8 mg/Nm³) is reflective of conditions when selective quarrying was carried out in order to use low pyrite material. This selective quarrying was undertaken to ensure that the current ELV of 500 mg/m³ in P0378-02 was achieved when lime was being manually dosed.

Quinn Cement is currently adding hydrated lime manually to the kiln feed to reduce SO₂ and HCl emissions and as part of this application an automated lime dosing system is being proposed. The option for selective quarrying will be limited in the future as low pyrite material is used up from local reserves, leaving only high pyrite material.

The EIS states that an incident of dust impairment/interference beyond the installation boundary occurred in September 2014, during a period when the facility was under interim management and the EPA prosecuted Quinn Cement Ltd for this incident. The original management, who designed, built and operated the facility since 2000, have since December 2014 taken over management control at the facility once again. Under current management there have been no convictions in relation to the facility from 2000 to 2013 and from 2015 to present. During the first shutdown in January 2015, upon

resuming management of the Plant, over €2 million alone was spent on upgrading the plant's dust abatement system.

Odour

Discharge from the road tankers to the storage silos will be by a pneumatic sealed system incorporating filtration to control the potential for dust and odour emissions during the discharge process.

The off loading of the SRF material is carried out in an enclosed building.

Emissions to atmosphere from this site were acceptable at the time of the site visit. This office has not received any odour complaints regarding this facility.

Noise

B.A.T. specifies the standard noise emission limit values of 55 (daytime) and 45 (night time) dB(A) at any noise sensitive location. Noise monitoring is undertaken annually by an external contractor at 6 No. noise sensitive locations which have been agreed by the EPA. This office has not received any noise complaints regarding this facility.

The EIS outlines the various noise abatement measures implemented at the plant since operations commenced in 2000. It also states that the noise model predicted that the noise level attributable to the proposed new items of plant will be negligible and will not cause any noticeable change to the noise levels due to the existing Cement Plant.

It is also concluded in the EIS that the increased traffic due to provision of alternative raw materials and fuels would have an insignificant impact on the area.

Receptors

The plant is located approximately 3km north of the town of Ballyconnell and covers an area of approximately 35-hectares. The facility is operational 24-hours per day for approximately 330-days per year, allowing time for scheduled shut down periods. Residential receptors are outlined in the Noise assessment.

The EIS states that due to the northern boundary of the proposed development site being contiguous with that of the national boundary between two member states, namely Northern Ireland and the Republic of Ireland, there will be areas where trans-boundary effects are inevitable and these areas have been dealt with, where they occur, in each individual report.

Public Consultation

During the site visit it was clarified that there is an information room open to the public at the Quinn Cement Facility where the public can go to learn about the proposed developments and types of materials used, obtain information leaflets and a site visit can also be provided. The letter to Cavan CoCo with the Planning Application outlines the availability of these measures.

There was prior consultation with the planning and licensing authorities prior to the EIA process, however it appears there was no direct public consultation conducted prior to or during the EIA process.

Construction

A Construction Environmental Management Plan should be approved before construction commences to ensure adequate mitigation measures are put in place and complied with.

Yours faithfully,

Irene McCabe

Irene McCabe
Environmental Health Officer

For inspection purposes only.
Consent of copyright owner required for any other use.