



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

An tSeirbhís Sláinte Comhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Ionad 6, Páirc Ghnó Bothar Chuinche,
Inis, Co. An Chlár.

Environmental Health Service,
Health Service Executive,
Unit 6, Quin Road Business Park,
Ennis, Co. Clare.

(065) 6706660

FAO: Ms. Jennifer Cope
Environmental Licensing Programme
Office of Environmental Sustainability

BAT Reviews - Clogrennane Lime Limited P0771-02
Clogrennane Lime Limited
Toonagh Limeworks, Ballybrody, Ennis, County Clare

Class and Nature of the Activity: 13.3: - Production of lime in a kiln
Reference No: P0771-02
EHS Reference: ID0578

Dear Ms Cope,

Reference is made to the above.

The application review was circulated to the following HSE stakeholders for comment on the 17th February 2017:

- Emergency Planning – Paschal Diviney
- Assistant National Director for Health Protection – Kevin Kelleher / Marie Woods
- Estates – Helen Maher, Estates Manager, Environmental Services
- CHO – Bernard Gloster

The Environmental Health Service (EHS) has the following comments on the BAT review for the above license.

Baseline Conditions

The EHS notes the baseline screening report submitted by the applicant and the conclusion that the only hazardous material stored that has the potential to contaminate water is diesel. The EHS also notes the control measures implemented and the recommendations for periodic testing for hydrocarbons both upstream and downstream of the holding tanks. It is noted that the current license P0771-01 does not have a requirement for groundwater monitoring.

In the interests of the protection of public health and any potential contamination of ground water the EHS is of the opinion that these recommendations should be formalised in any new Determination and the sampling period should be at least annually with results included in the Annual Environmental Report.

It is noted that the current activities on site include extraction of ground water for drinking water.

In the interests of the protection of public health, the EHS recommends that any water used for drinking or the preparation of food should be sampled to ensure it meets the requirements of: S.I. No. 122 of 2014 EUROPEAN UNION (DRINKING WATER) REGULATIONS 2014.

Consideration was given to the applicant's BAT review schedule and the responses given in the submitted documents: http://www.epa.ie/licences/lic_eDMS/090151b2805f79fd.pdf

The following observations are made to the Agency:

BAT requirement 2: reduce or minimise noise

The EHS notes the current licensed conditions for noise emissions of 55dB (A) leq(90) 30 mins day time and 45 dB(A) leq(90) 30 minutes night time and the 2016 reporting results reproduced below:

Table N1: Noise monitoring summary

Date of monitoring	Time period	Noise location (on site)	Noise sensitive location - NSL (if applicable)	LA _{eq}	Tonal or impulsive noise* (Y/N)	Is site compliant with noise limits (day/evening/night)?
Q1 - Day	30	NSL1	NSL1	42.9	No	Yes
Q2 - Day	30	NSL1	NSL1	49.3	No	Yes
Q3 - Day	30	NSL1	NSL1	44.1	No	Yes
Q4 - Day	30	NSL1	NSL1	47.9	No	Yes
Q1 - Night	30	NSL1	NSL1	41.8	No	Yes
Q2 - Night	30	NSL1	NSL1	41.4	No	Yes
Q3 - Night	30	NSL1	NSL1	39.1	No	Yes
Q4 - Night	30	NSL1	NSL1	40.7	No	Yes
Q1 - Day	30	NSL2	NSL2	52.4	No	Yes
Q2 - Day	30	NSL2	NSL2	52.4	No	Yes
Q3 - Day	30	NSL2	NSL2	51.3	No	Yes
Q4 - Day	30	NSL2	NSL2	52.7	No	Yes
Q1 - Night	30	NSL2	NSL2	42.9	No	Yes
Q2 - Night	30	NSL2	NSL2	41	No	Yes
Q3 - Night	30	NSL2	NSL2	41.3	No	Yes
Q4 - Night	30	NSL2	NSL2	40.4	No	Yes

The applicant response to BAT 2 is that all requirements a to s (or a combination) of BAT section 2 are being implemented. The EHS is not aware of any complaints regarding noise from the facility and is satisfied the current operating conditions are not a potential public health nuisance, with regard to noise.

BAT 3 to 29 – the EHS cannot identify where BAT 3 to 29 has been reviewed by the applicant. It is the understanding of the EHS that all BAT should be reviewed and if not applicable stated as such.

BAT requirement 40, 41 and 42: minimise dust emissions

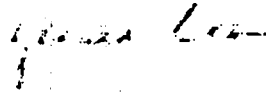
The current license P0771-01 conditions Dust Deposition 350 Level (mg/m²/day) measured at the monitoring points AM 1, AM 2, AM 3, AM4 at northern, eastern, southern and western boundaries of installation respectively, adjacent to noise monitoring locations. It is noted that monitoring of this emission is not included in the schedule C.1.2 of the current license and no monitoring results could be identified in the AER for 2016. The applicant response to BAT 40, 41 and 42 does not include all aspects of BAT conclusions and it is therefore recommended that the aspects of BAT conclusions being employed to minimise dust are verified as effective, through monitoring, in ensuring compliance with licensed conditions.

The EHS recommends that dust monitoring is included in any Determination to ensure compliance with existing licensed conditions. If the conditions are not being met then the response to BAT 40 to 42 should be reviewed. Dust emissions are also considered in BAT 58, 59 and 60 which have not been recorded as reviewed.

BAT 55 to 69 have not been recorded as having been reviewed.

If you wish to discuss the above then in the first instance you should contact Gerard Leen, Principal Environmental Health Officer, at the above address.

Yours Sincerely,

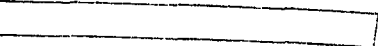


Gerard Leen
Principal Environmental Health Officer

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Dorota Richards

From: Hueston, Caroline <
Sent: 11 April 2017 13:17
To: Dorota Richards
Subject: PO771-02 Clogrennane Lime Ltd, Toonagh Limeworks, Ballybrody, Ennis, Co. Clare
Attachments: PO771-02 Clogrennane Lime Ltd.pdf

Dear D. Richards

Attached please find the Environmental Health Service submission on BAT review for Clogrennane Lime Ltd PO771-02

Regards,
Caroline Hueston
Environmental Health Officer

This email has been scanned by the Symantec Email Security.cloud service.
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