Surmission No. 1

400611001
ENVIRONMENTAL HEALTH DEPARTMENT,
St. Dympna's Hospital,
Athy Road,
Carlow,
Ireland.
Telephone 059 9136574
Fax 059 9136508



Dorota Richards,
Programme Officer,
Environmental Licensing Programme,
Environmental Protection Agency,
Headquarters, PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.
Y35 W821

17th November 2017.

RE:

Roadstone Limited, Maddockstown Quarry, Dunbell Big, Bennettsbridge, County Kilkenny

Proposed Development: Industrial Emissions Licence PO521-03

Dear Ms. Richards,

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

The following HSE departments were made aware of the consultation request for the proposed development on 19th October 2017:-

Emergency Planning – David Sullivan Assistant National Director for Public Health – Kevin Kelliher/Marie Woods CHO – Aileen Cleary Estates – Jim Murphy

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 Mr. Paul Harrington, Principal Environmental Health Officer, Environmental Health Section, St. Dympnas Hospital, Athy Road, Carlow Town.

Yours Sincerely

Paul Harrington,
Principal Environmental Health Officer.
paul.harrington@hse.ie

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HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2001,
& Regs made thereunder).

Report to: Dorota Richards,
Programme Officer,

Environmental Protection Agency

Other (please specify)	
Planning Authority:	N/A
Reference Number:	PO521-03
Applicant:	Roadstone Limited, Maddockstown Quarry, Dunbell Big, Bennettsbridge, County Kilkenny

Proposed Development:

1.3 The extraction and processing (including size reduction, grading and heating) of minerals within the meaning of the Minerals Development Acts 1940 to 1999, where an activity involves any other operation where either the level of extracted or processed minerals is greater that 200,000 tonnes per annum or the total operational yield is greater than 1,000,000 tonnes and storage of related mineral waste.

1. 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 have made observations and submissions on the following specific EH areas;

Dust
Noise
Drinking water
Surface water
Wastewater Treatment

Drinking water

A ground water extraction point onsite is used for drinking water.

In the interests of public health the water from this source should be sampled to ensure that it complies with EC (Drinking Water) regulations 2014.

Dust

Dust Deposition Monitoring Results – Maddockstown Quarry 2016 indicate high levels of dust in D1 (monitoring point) and D2. D1 and D2 are on the western side of the development and D2 in particular is located close to 4 houses. D2 had a high level of dust in December and during the summer months. D12 had high levels of dust in September and December and is located on the western side of the proposed extension. The high levels of duct at these locations would suggest that the haulage routes are a significant source of dust. Locations D4, D7, D8 and D11 were discontinued without explanation and there were no external (offsite) monitoring points included in the study.

In the interests of public health the location of dust monitoring sites needs to be reassessed. External (offsite)I monitoring sites need to be provided to ensure that a true reflection of the dust emissions from the development is obtained. BAT technology and dust suppression techniques needs to be used to ensure that dust emissions are kept to a minimum. Particular attention needs to be paid to the internal haulage routes.

Surface Water

A Biological Water Quality Assessment (slr ref 501.00180.00168) was conducted to give a representative analysis of the Rathgarvan Stream, which is a tributary of the River Nore, and runs through the development. This was the first water quality analysis of this water course since the inception of the quarry. The study was conducted using samples taken at 'an optimum time of the year and during favourable stream condition'. It was based on a single set of samples. A q rating of q3-4 (slightly polluted) was achieved.

In the interest of public health and in the preservation of surface water quality I would recommend that a Biological Water Quality Assessment is carried out annually and that appropriate action is taken if the water quality deteriorates.

Wastewater Treatment

A wastewater treatment (septic tank) plant is used to treat wastewater from the onsite canteen, toilets and administration buildings. The treatment plant has a capacity for 10-12 people. Very little information is provided in this report regarding the treatment plant and whether or not a percolation area is provided. The treatment plant predates Roadstones involvement in the quarry. The new development will involve circa 40 personnel (mainly drivers, contractors etc) and will put additional loading on the treatment plant.

In the interests of public health and to safeguard the groundwater water quality in the development, the operation, location and design of the treatment plant needs to be reviewed. The location of the percolation area and its suitability need to be examined. A suitable alternative needs to be provided if the current treatment plant is found to be unsuitable.

Noise

A Noise Monitoring Report BHP ref no. 16/03/505, was submitted as part of this application. The Daytime noise level was monitored on the 17th March 2016 and the Nightime noise level was monitored on the 16th March 2016. As the 17th March 2016 was a public holiday, no information was given in the report as to the workings of the quarry on that date. If the quarry was not working at its optimum capacity, then the noise levels recorded are not a true reflection of the quarry at work.

There is no assessment of the contribution of 220 articulated lorry movements (110 return trips) that the quarry, working at full capacity, would bring to the environment.

In the interests of public health BAT techniques need to be employed to reduce the noise levels at the entrance/exit from the quarry. Efforts need to be made to limit the number of lorry movements from/to the development.

* All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Paul Harrington, Principal Environmental Health Officer, Environmental Health Section, St. Dympnas Hospital, Athy Road, Carlow Town