

Environmental Health Service HSE Dublin/North East Cavan and Monaghan The Arcade

Ref/ BC/CO'D/ EHIS Ref: 0577

23 March 2017

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

Tel No: +353 (0) 49 4373418
Fax No: +353 (0) 49 4373427

Re/ Review for an Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: 10.1 and 11.1 Cement Production

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

Ref. No/ P0378 - 03

Dear Ms Kearey,

Please find enclosed the Health Service Executive consultation report in relation to the above application.

The following HSE departments were made aware of the consultation request for the above application on 17 February 2017:

- Emergency Planning
- Estates
- Assistant National Director for Health Protection
- RDPI

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 20 March 2017.
- 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 observations and submissions under the following specific areas;

Human Beings

Water

Climatic Factors

Interaction of the above

Soil

Air

Material Assets

Waste

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

Yours sincerely,

Claire O'Dwyer

Principal Environmental Health Officer



Environmental Health Service
HSE Dublin/North East
Cavan and Monaghan
The Arcade
Main Street

Main Street Cavan Co. Cavan

Tel: 049 4373418 Fax: 049 4373427

23 March 2017

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

Re/ Application for Integrated Pollution Prevention and Control Licence.

Class and Nature of Activity: 10.1 and 11.1 Cement Production

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

Location of Facility: Scotchtown, Ballyconnell, County Cavan

Ref. No: P0378-03

EHIS Ref: 0577

Dear Claire,

The EPA has on the 18 January 2017, initiated a review of Industrial Emissions Licence register number P0378-02 for Quinn Cement Limited, Scotchtown, Ballyconnell, County Cavan. The purpose of the review is to bring the licence into compliance with the legal requirements of the European Commission Implementing Decision on Best Available Techniques (BAT) conclusions for the production of cement (2013/163/EU).

We have been notified by the EPA in a letter dated 07 February 2017 that the register number for the purposes of this review is P378-03.

Quinn Cement is proposing to increase the range of alternative fuels and alternative raw materials to improve the sustainability of the plant. The long term aim is to displace almost all of the fossil fuels such as coal which are currently being used along with alternative fuels. Furthermore the applicant intends to carry out structural works to support the proposed new development.

Following a review of the Baseline Report submitted by the applicant and a review of related documents in conjunction with EPA guidance documents and associated Legislation, the Environmental Health Service conducted a site visit on 20 March 2017 where contact was made with Mr Fintan Coyle, Environmental Manager for the plant.

The following are observations made during the site visit:

Receptors

There is no neighboring dwelling house within 100m of this site. Mr Coyle has stated that there have been a number of complaints to date. One of the complaints related to noise however this has been resolved and the other complaints were in relation to dust. Mr. Coyle informed me that the plant has a number primary and sub-primary dust monitoring sites located around the plant and its boundaries which continually monitor dust levels. Mr Coyle informed me that all of the current and future deliveries of fuels and raw material are via an 'Enclosed Sealed System' which eliminates any further risk of dust pollution. This office is not aware of any complaints.

It is recommended that the plant continue to monitor closely the levels of dust pollution particularly when any new processes are introduced.

Water Supply:

The plant is supplied with water via three bored wells located on the site GW1 and GW2. Bored well number three is used for the lorry wash but is not identified in the Baseline Report. The well heads are protected and there is no risk of contamination from surface water.

Instead of discharging water to the river the plant intends, in the future, to begin recycling water from the settlement tank for the purpose of cooling in the plant. It is envisaged that this advancement will be a much more sustainable approach to water use and will significantly reduce the use of natural resources.

Surface Water & Storm Water

All clean surface water from the yards and the storm water from the roofs are drained via a piped drainage system to a settlement tank. This is to ensure that the suspended solids of the collected surface water is reduce to an acceptable level before it is discharged from the tank through an oil interceptor to Woodford River. Testing of the discharged water is closely monitored at SW1. Further testing is conducted up river from the discharge point and below the discharge point. There was no evidence during the site visit to suggest that the clean surface water or storm water was being contaminated by soiled water.

It is recommended that a condition of the licence stipulate the surface water quality monitoring scheme be strictly monitored. This is particularly important when using alternative materials where the potential impact on water quality may be unknown.

Odour

At the time of the visit odour levels appeared normal for this type of production.

175 -

Noise

The site is located in a rural environment. B.A.T. specifies the standard noise emission limit values of 55 (daytime) and 45 (night time) dB(A) at any noise sensitive location. It is not envisaged that there will be any significant increase in noise levels from the facility following the proposed development. At the time of the site visit noise levels appeared acceptable.

Pest Control

Mr. Coyle stated that pest control measures on site are maintained and administered by Rentokil.

Oil Storage Tank:

There are three large oil storage tanks located in the one location on site which are suitably bunded.

Conclusion:

The plant appears to be operated in a very efficient manner by the applicant. Mitigating measures are in place to reduce dust, noise and water pollution with the appropriate controls in place to monitor same. Other than the observations stated above, the HSE have no further concerns at this time regarding this facility.

Yours faithfully,

PR Barry Coady
Environmental Health Officer