



Submission

Submitter:	Mr Declan Mulhare
Organisation Name:	HSE
Submission Title:	Submission by the Environmental Health Service regarding P1108-01 Glanbia Cheese EU Ltd
Submission Reference No.:	S005500
Submission Received:	13 May 2019

Application

Applicant:	Glanbia Cheese EU Limited.
Reg. No.:	P1108-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Health Service Executive

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Integrated Pollution Control Licence Application

HSE Submission Report

Environmental Health Service Consultation Report

Date: 9 May 2019

Our reference: 0931

Report to: Environmental Licensing Programme
Office of Environmental Sustainability,
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

Type of Consultation: Industrial Emissions Licence Application

EPA Reference No: P1108-01 Glanbia Cheese EU Ltd

Applicant: Glanbia Cheese EU Ltd.
National Enterprise Park, Togher, Portlaoise, Co. Laois

Nature of Activity: The treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from:

- (i) only animal raw materials (other than exclusively milk) with a finished product production capacity greater than 75 tonnes per day;
- (ii) only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year;
- (iii) animal and vegetable raw materials, both in combined and separate products, with a finished product production capacity in tonnes per day greater than:
 - (I) 75 if A is equal to 10 or more; or
 - (II) $[300 - (22.5 \times A)]$ in any other case,where 'A' is the portion of animal material (in percent of weight) of the finished product production capacity.

Introduction

The following HSE departments were notified of the consultation request for the licence application on 12th April 2019.

- Emergency Planning - Brendan Lawlor
- HSE Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher and Laura Murphy
- CHO – Pat Bennett
- Environmental Health

This report only comments on the environmental health impacts of the proposed licence application.

General

The licence application is for the development by Glanbia Cheese EU Ltd of a proposed mozzarella cheese processing facility on a green field site at the National Enterprise Park, Togher, Portlaoise, Co. Laois. Raw materials used will include curds and milk powders produced at other locations.

All commitments to future actions, including mitigation and further testing have been taken as read, and all data has been accepted as accurate. No additional investigations/ measurements were undertaken in the review of the application.

In respect of this application, the areas reviewed were those of concern to Environmental Health and which are:

- Any potential contamination of surface water
- Any potential contamination of ground water
- Emissions to air including noise

The Environmental Health Service undertook a visit to the site on 4TH September 2018

The material submitted in the licence application and supporting documentation were reviewed with regard to the '**Best Available Techniques Reference Document on Food, Drink and Milk Industries**' and '**Best Available Techniques for the Purposes of the Production of Food Products from Vegetable & Animal Raw Materials**'

Surface Water

The Environmental Health Service (EHS) has considered any potential risk of contamination of surface water from the proposed facility and makes the following comments:

- a) It is noted that all water emissions from the site will be controlled. Section 5.2.1 of the Appropriate Assessment outlines the treatment process for storm water on site, prior to its discharge to the public storm water drain. It was also noted that weekly visual inspections of storm water will be undertaken in addition to biannual monitoring of other parameters (COD, pH, conductivity and suspended solids)

Ground Water

The Environmental Health Service considered the potential risks of contamination of ground water and notes in the Non-Technical Summary Report and in the Application Form that process effluent will be discharged to the mains sewer following treatment in an on-site Waste Water Treatment Plant.

- a) Section 2.4 of the *'Screening for Appropriate Assessment'* document refers to concerns raised by Laois County Council regarding potential contamination of two local streams, namely the Golf Club Stream and the Curriers bog Stream, which are in close proximity to the site. The EHS notes the measures proposed in attachment 9.1 EPA Application Form *'Environmental Management Techniques'* to prevent accidental emissions, including into groundwater
- b) The EHS further notes the measures included in Section 5.7 of the *'Fire Retention Risk Assessment'* to prevent ground water contamination from fire water

The Environmental Health Service is satisfied that any potential risks to surface and ground water have been considered in the application.

Emissions to Air Including Noise

In considering the potential impact to air from the proposed development the Environmental Health Service reviewed the Application Form, the BREF assessment, the Emissions Impact Assessment, the Emissions-Air and the Emissions-Noise reports. There are three emission points to air with ELV's, which will be from 3 hot water boilers. The Air Dispersion Modelling Report indicates that the only pollutant arising from these sources will be nitrogen oxides, as a consequence of the combustion process. A number of minor and potential emissions have been identified.

In assessing the risk of fugitive emissions, the Environmental Health Service concludes that Glanbia Cheese EU Ltd has implemented Best Available Technology and is satisfied that potential risks to the environment and human health has been addressed.

The Environmental Health Service further noted in Attachment 7.5 – *'Noise Emissions'* that the design of the proposed development incorporated acoustic design systems aimed at minimising noise emission through the appropriate location of plant, equipment & buildings and that the tendering process prioritised plant & equipment with lower inherent noise emissions. The location of the proposed development is not within a designated 'Quiet Area' under any Noise Action Plan.

Due to the location of the M7 motorway, the background noise levels are high and currently exceed EPA NG4 guidance evening noise levels at NSL5 and NSL6. The proposed operation of the facility is not predicted to increase these existing background levels.

The predicted operational noise emissions from the facility are predicted to increase night time noise levels at NSL5 and NSL6 by 3 dB. The noise levels after this predicted increase will still be below the guidance level of 45 dB for evening noise detailed in EPA Guidance NG4. Using criteria in BS4142:2014, the EHS do not consider a 3dB increase in the prevailing noise environment to a level still below the EPA Guidance threshold in NG4, is of a public health concern.

Conclusion

The Licence application is for a purpose built facility on a greenfield site. Any potential risks to surface and ground water have been considered in the application. Mitigation measures have been detailed that should be put in place to reduce any potential environmental health risks.

Any noise emissions from the proposed activities will either not contribute to an increase in the existing noise environment at NSLs, or where it will, will not increase in a magnitude to either have a potential significant public health impact or to be above the noise thresholds identified in EPA Guidance NG4.

The Environmental Health Service has no further comments on the licencing application.

All correspondence or any queries with regard to this report, including acknowledgement of this report, should be forwarded to Mr Declan Mulhare, Principal Environmental Health Officer, at the above address

Yours sincerely



Declan Mulhare
P.E.H.O

Yours sincerely



Mary Kate Holohan
E.H.O

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