



### Submission

Submitter:	Mr Shane O'Flynn
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission Architectural and Metal Systems Ltd IE Licence P1117-01
Submission Reference No.:	S005856
Submission Received:	23 October 2019

### Application

Applicant:	Architectural & Metal Systems Limited
Reg. No.:	P1117-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

North Lee Environmental Health Service,  
Floor 2, Block 1 St Finbarr's Hospital,  
Douglas Road,  
Cork,

Phone: 021 4921801  
E-Mail: Catherine.McCarthy@hse.ie

**Date:** 17 October 2019

**Our reference:** 1014

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

**Type of consultation:** Industrial Emissions

**Applicant:** Architectural & Metal Systems Limited, Wallingstown, Little Island, Cork

**EPA Reference Number:** P 1117-01

Dear Sir/Madam

Please find enclosed the HSE consultation report in respect of the above proposal. If you have any queries regarding this report, the initial point of contact is Ms. Catherine McCarthy, Principal Environmental Health Officer, who will refer your query to the appropriate person

*Catherine McCarthy*

Catherine McCarthy  
Principal Environmental Health Officer

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**Report to:** Environmental Licensing Programme  
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Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

**Type of Consultation:** Industrial Emissions

**Applicant:** Architectural and Metal Systems Ltd,  
Wallingstown,  
Little Island,  
Cork

**Nature of Activity:** The surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceeds 30m<sup>3</sup>

**EPA reference:** P1117-01

## Introduction

The following HSE departments were notified of the consultation request for the licence application on 26<sup>th</sup> September 2019

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/Laura Murphy
- CHO – Ger Reaney

This report only comments on Environmental Health impacts of the licence application.

## **General**

Architectural and Metal Systems (AMS) has operated from their current plant at Wallingstown, Little Island, Cork since 2001. AMS is Ireland's only independently owned manufacturer of extruded aluminium profiles. The company specialises in aluminium extrusion, powder coating and sheet metal fabrication from their 250,000 sq. ft. facility in Little Island.

AMS has applied for an Industrial Emissions Licence for their proposed anodising operation within a new facility at their existing plant at Wallingstown. Anodising is an electrochemical process which converts a metal surface into a decorative, durable, corrosion resistant, anodic oxide finish.

As this activity falls within Category 12.3 of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions licence is required.

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 investigation/measurements were undertaken in the review of this application.

**The Environmental Health Service has not received any complaints regarding the existing Architectural and Metal Systems facility.**

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

- Any potential contamination of surface water or ground water
- Emissions to air including noise, dust and process emissions

An Environmental Health Officer visited the site on 4<sup>th</sup> October 2019.

The material submitted in the licence application was reviewed having regard to the 'BAT Guidance Note on Best Available Techniques for the Surface Treatment of Metals and Plastic Materials (1st Edition EPA 2008)

## **Site location**

The AMS facility is located in Wallingstown, Little Island, Cork, which is an intensive industrial area on the banks of Lough Mahon known as Barry Point. It is on the mouth of Cork Harbour. The nearest residential house, located approximately 800m from the facility, is at the edge of St. Lappan's Place, a medium sized residential estate off the L623 road. There are no sensitive receptors in the immediate vicinity of the plant.

## **Surface water and ground water**

The Environmental Health Service has considered any potential risk of contamination of surface water and makes the following comments:

There are no known private water supply wells in the vicinity of the plant.

Section 7.2 of the Application Form (*Emissions to Surface Water*) states that there will be no emissions to surface water. There are no exposed soils near any storage area for raw materials that are classified as hazardous and the site is almost 100% hard standing with concrete cover. The Environmental Health Service notes the results of the baseline groundwater sampling undertaken which is referred to in the Baseline Report contained within the application form.

It is noted that all hazardous material will be stored in bunds which will be inspected weekly.

**The Environmental Health Service recommends that all surface water, including wash water and fire water, passes through the hydrocarbon interceptor prior to discharge to Lough Mahon.**

## **Discharge to sewer**

Chapter 5.1 of the Non –Technical Summary states that the applicant has a discharge licence for process effluent to discharge to the public sewer. The



effluent is then treated at Carrigrenan Wastewater Treatment Plant prior to discharge to Lough Mahon.

**In order to protect public health, the Environmental Health Service recommends that the Emission Limit Values stated in Irish Water's letter (Sewer Discharge Consent) dated 22 August 2019 are strictly enforced.**

**Emissions to air, including noise, dust, odour and process emissions to the atmosphere.**

The licence application form states that there are two emission points for emissions to atmosphere on site, one for emissions of sodium hydroxide and the second for emissions of ammonia. **Local exhaust ventilation must be provided where sodium hydroxide is used and the ventilation system employed must be subject to regular inspection/maintenance.** It is noted that bi-annual monitoring will be undertaken of waste gas emissions to the atmosphere.

It is noted that it is not anticipated that there will be any fugitive process emissions. **However, it is recommended that odour monitoring is undertaken at the site boundary in order to confirm that fugitive odours cannot be detected.**

## **Noise**

The site is located in a heavily industrialised area known as Wallingstown. Land in the vicinity of the site is used industrial activities, including hazardous waste disposal, pharmaceutical and transport. The nearest sensitive receptors are situated over 800m from the plant.

**As the Extrusion Plant operates outside of normal working hours i.e. from 6am Monday morning until 3am Sunday morning, it is recommended that noise monitoring is undertaken at the site boundary so that any increase in noise levels from the plant will be identified and mitigation measures applied.**

It is not anticipated that the operation of the plant will give rise to dust emissions.

## Conclusions

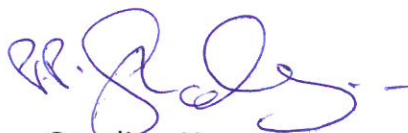
The Environmental Health Service makes the following recommendations in respect of this licence application:

- All surface water, including wash water and fire water, should pass through the on -site hydrocarbon interceptor prior to discharge to Lough Mahon.
- The Emission Limit Values stated in Irish Water's letter (Sewer Discharge Consent) dated 22 August 2019 are incorporated into the licence conditions and are strictly enforced
- Local exhaust ventilation must be provided where sodium hydroxide is used/produced and the ventilation system employed must be subject to regular inspection/maintenance
- Odour monitoring is undertaken at the site boundary in order to confirm that no fugitive odours can be detected.
- Noise monitoring is undertaken at the site boundary in order that any increase in noise levels from the plant will be identified and mitigation measures applied.

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Shane O'Flynn  
Environmental Health Officer  
Cork



Caroline Hueston  
Environmental Health Officer  
Environment Operational Unit



<b>HSE South Emergency Management Consultation Report</b>			
<b>Report to</b>	Catherine McCarthy, PEHO, North Lee	<b>Date</b>	22 <sup>nd</sup> October, 2019
<b>Type of consultation:</b> EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
<b>Other (please specify)</b> Industrial Emissions (IE)			
<b>Authority</b>	Environmental Protection Agency		
<b>Authority Reference Number</b>	EPA P1117-01 EHIS Ref.: 1014		
<b>EM Reference Number</b>	EMENV 024		
<b>Applicant</b>	Architectural & Metal Systems Ltd., Wallingstown, Little Island, Co. Cork		
<b>Proposal</b>	The surface treatment of metals and plastic materials using an electrolytic or chemical process where the volume of the treatment vats exceed 30 m3		

#### HSE South Emergency Management Observations:

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the 'ETHANE' format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e.; a green sign with a yellow border and white lettering citing the abbreviation R.V.P.
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the 'off-site' impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*.  
<https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or [maryanne.horgan@hse.ie](mailto:maryanne.horgan@hse.ie)





**Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance Service and / or Fire and Rescue Service**

**WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)**

<b><u>GIVE THE FOLLOWING INFORMATION</u></b>	
<b>This is: _____ Eircode _____</b> (Name, Telephone Number and Eircode Address of site)	
<i>An incident has occurred at this site - standby for ETHANE message</i>	
<b>E</b>	
	<b>Exact location of the incident</b>
<b>T</b>	
	<b>Type of incident, e.g.: fire, explosion, gas leak, etc</b>
<b>H</b>	
	<b>Hazards – current and potential</b>
<b>A</b>	
	<b>Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)</b>
<b>N</b>	
	<b>Number of casualties and their condition – specify adult / children if known</b>
<b>E</b>	
	<b>The emergency services present and required</b>
<b>N.B. If you require another emergency service stay on the line and repeat the steps again</b>	

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**R.V.P.  
No.1**