Submission	
Submitter:	Miss Fiona Byrne
Organisation Name:	HSE
Submission Title:	P0401-02
Submission Reference No.:	S005892
Submission Received:	16 December 2019
Application	
Applicant:	Metal Processors Limited
Reg. No.:	P0401-02
See below for Submission details. Attachments are displayed on the following page(s).	

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Date: 13 December 2019

Our reference: 1041

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

EPA reference: P0401-02

Type of Consultation: Industrial Emissions

Applicant: Metal Processors Limited

Nature of Activity:

Classes and Nature of Activity in accordance with the EPA Act 1992 as amended			
Class of Activity	**Main Activity**	**EPA Act Sector (where applicable)**	**Class of Activity Description**
3.4.1 (b)	No	Metals	The melting, including the alloyage, of non-ferrous metals, including recovered products and operation of non-ferrous metal foundries, with a melting capacity exceeding 4 tonnes per day for lead and cadmium or 20 tonnes per day for all other metals.

Introduction

The following HSE departments were notified of the consultation request for the licence application on 3 October 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

Metal Processors Limited has been in production at Station Road, Clondalkin, Dublin 22 since 1998. An Industrial Emissions Licence P0401-1 was issued by the EPA in 1998. The company has now applied to the EPA for a review of that licence.

The primary activity carried out by the applicant is the production of sheet and block lead. Scrap lead is accepted by the applicant on-site before being melted and refined to 99.95% purity in accordance with the European Standard EN12588 Lead and lead alloys - Rolled lead sheet for building purposes. Refined lead is then cast into mouldings to produce lead blocks, which are either milled on-site to produce rolled lead sheet which is then sold to the construction industry, or dispatched directly to a sister facility abroad owned by The Calder Group for further processing. In addition to the main lead production activity, the applicant is also involved in the distribution of roofing materials and ancillary roofing products, and on-site metalworking activities.

The reason for the review application is the storm water discharge trigger level for Lead was exceeded four times in the last reporting year. These were categorized as minor environmental incidents. It is however a recurring issue, with storm water trigger levels for lead also being exceeded in the years 2015, 2016 and 2017. Under this Licence Review Application Metal Processors propose to redirect storm water discharges containing elevated levels of lead to the sewer.

The upgrading of the drainage network will involve.

- The constructing of a Dual Flow Drainage System on-site, otherwise known as the 'Water Retention Tank and Balancing System'. This is to ensure storm water discharges containing elevated levels of lead are discharged to foul sewer.

The upgrade of the drainage network aims to ensure that storm water runoff from the site into the Gallanstown Stream, which is in the surface water body catchment of the Camac Lower, does not contain elevated levels of lead.

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 is not aware of any complaints received regarding Metal Processors Limited.

In respect of this application for an Industrial Emissions licence, the areas reviewed were those of concern to Environmental Health which are:

- any potential contamination of surface water or ground water
- emissions to air, including noise and odour

Site Location

The Metal Processors Limited facility comprises a number of industrial buildings located on Station Road, Clondalkin, Dublin 22, to the west of Dublin City centre and adjacent to the M50. The current landholding is situated in Clondalkin Industrial Estate and is immediately surrounded by commercial and industrial facilities. The total area of the site is approximately 1.85 hectares. It is bordered to the north by the Dublin to Cork Railway Line, to the west the Station/Cloverhill road and to the east and south by industrial and commercial facilities. The M50 motorway runs approximately 650 metres to the east of the site. The nearest residential dwellings are situated in James Connolly Park housing estate which is approximately 100 m to the southwest of the site. The Grand Canal Greenway is situated approximately 300 metres south of the site. The River Camac is situated approximately 960 metres to the south of the site. The majority of the site is utilised by Metal Processors Limited for the overall production operation, storage warehouses, access roads and car parking requirements.

The site is not located within or adjoining any designated conservation areas. The nearest designated area is the Grand Canal proposed Natural Heritage Area (pNHA), which is situated 300 metres to the south of the site. The nearest Natura 2000 site is Rye Water Valley/Carton Special Area of Conservation which is situated approximately 7.1 km north west of the site.

Ground water, surface water and soil

The Soil and Groundwater Baseline Report which was submitted as part of the application outlines the storage of hydrocarbons as the main risk posed to soils and groundwater across the site.

Surface water:
The main environmental risk at the site is storm water with high concentrations of lead discharging to a local river. This can occur due to the handling, storage and processing of lead at the facility which can result in the generation of airborne lead dust. The risk arises when lead dust emanates from the storage and processing areas to the yard area by way of the entrances to buildings. Consequently, there is a risk that settled lead dust could become entrained in storm water run-off arising in yard areas.

The measure proposed in the EIAR to mitigate against the lead contamination is to utilize a dual flow drainage system to ensure first flush storm water containing elevated levels of pollutants is discharged to foul sewer.

There is an additional risk to the surface water due to the acculturative effect due to the presence of Greyhound Recycling's Material Recovery Facility and Hammond Lanes Metal Recycling facility which are both situated in the industrial estate. However, given that both of the aforementioned facilities are controlled under an IPC licence and a Waste Facility Permit respectively and given that stormwater discharges from these sites are monitored, controlled and appropriately treated where necessary under these authorizations, it is not anticipated that any significant polluting discharges will be discharged from these sites under normal circumstances.

Ground Water:
Metal Processors site is underlain by a "*Locally Important aquifer*" with vulnerability at the site according to the GSI Groundwater Vulnerability Map rated as "*Extreme*".

The GSI well database records one private industrial well located approximately 400m to the southeast of the facility at a depth of 53.3 mbgl and with a recorded yield of 157.1 m3 /day. The well is used for industrial purposes only. According to the Groundwater Source Protection Zone Map, the site is not located within a groundwater Source Protection Zone.

Soil:
Soil sampling was undertaken in November 2018 to characterise the soils on site. A total of six boreholes were drilled to depths ranging between 1.25 and 3.0 mbgl using a window sample percussive drill rig. Two soil samples were taken from each borehole giving a total of 12 soil samples for chemical sampling. All soil samples were analysed for a standardised and detailed list of typical screening parameters which are used to indicate contamination and relate to the activities at the Metal Processors facility.

The soil analysis results indicated that the soil conditions across the Metal Processors site were consistent with natural background levels of soils across Ireland and do not indicate any notable presence of contamination.

There will be no direct or indirect emissions to ground associated with the proposed activity as the entire site is entirely underlain by an impermeable concrete surface. In addition a reinforced mass concrete bund is situated on-site to act as secondary containment for two diesel primary storage tanks, in order to prevent the release and run-off of hazardous materials to the drainage system. In addition, oils (e.g. motor oil, hydraulic oil) are stored onsite in pre-fabricated plastic bunds in the Maintenance Workshop Building. The integrity and water tightness of all of these bunds are tested every three years in accordance with the requirements of the licence.

Emissions to air, including noise and odour

Air:
As part of the application an Air dispersion model was performed on their 40 metre stack known under the applicant's existing IED licence as emission point AE-1. The following parameters were modelled, Particulates as PM10, Arsenic, Cadmium, Copper, Nickel, Lead, Antimony, Tin and Zinc. All the parameters modelled were shown to be within the required limits and deemed that air emissions from the site will have a negligible impact on ambient air quality.

The exhaust emissions from the smelting and refining processes on-site are controlled by channelling them through ducting towards and an air abatement system consisting of a cooling tower system, an air cyclone system and baghouse filters, before being discharged via the 40 metre stack mentioned above.

It was also noted in the application form that fugitive metal dust arising on-site due to the storage, handling, transport and processing of metals is minimized to the ambient air by all storage and processing taking place indoors.

In addition a road sweeper cleans the yard area on a weekly basis to further minimize the amount of dust generated on yard areas.

Additional measures have also recently been implemented to reduce fugitive dust emissions to the non-process yard area on-site. These are as follows: 1. A water spray is used during loading of scrap lead into hopper/conveyor belt to suppress lead dust in the refining area. 2. Internal floors in processing areas in the Refining Area, Engineering Works Area and Milling Area are cleaned using a vacuum sweeper on a daily basis. 3. Water misters are used during offloading of incoming raw materials to dampen down dust in the Refining Area. 4. A fast acting roller door will be installed in the passageway at the Lead Refinery to minimize wind-blown dust through this area.

Noise:

As part of the application an industrial noise assessment report was submitted. Monitoring was carried out at two noise sensitive locations (NSL), a housing estate to the south west of the site and the corner of a proposed housing development.

The survey concluded that there was no audible site noise emanating from Metal Processors at either of the NSL during the day or the night. The dominant noise at the housing estate was local traffic for both day and night, and at the proposed housing estate the dominant noise source was local traffic, industrial noise coming from the industrial units on the opposite of the rail line and also frequent trains during the day.

Conclusion

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

- The biannual monitoring of the storm water drain should continue to take place to ensure concentrations of lead along with the other parameters as prescribed in Metal Processors existing licence do not discharge into the Gallanstown Stream.

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Principal Environmental Health Officer

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Date: 13 December 2019

Name: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

Re: Industrial Emissions Licence Application P0401-02

Applicant: Metal Processors Limited, Station Rd, Ballymanaggin, Dublin 22

Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Mr Tom Prendergast, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Tom Prendergast
Principal Environmental Health Officer