



### Submission

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|---------------------------|------------------------------|
| Submitter:                | Mr Shane O'Flynn             |
| Organisation Name:        | Health Service Executive     |
| Submission Title:         | HSE Submission Roadstone Ltd |
| Submission Reference No.: | S005956                      |
| Submission Received:      | 22 January 2020              |

### Application

|            |                   |
|------------|-------------------|
| Applicant: | Roadstone Limited |
| Reg. No.:  | W0307-01          |

See below for Submission details.

Attachments are displayed on the following page(s).

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North Lee Environmental Health Service,  
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**Date:** 22 January 2020

**Our reference:** 1096

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

**Re:** Waste Licence Application

**Proposed development:** Castleredmond, Middleton, Co. Cork

**EPA Reference:** W0307-01

**Name and Address of applicant:** Roadstone Ltd., Fortunestown, Tallaght, Co. Dublin

Dear Sir/Madam

Please find enclosed the HSE consultation report(s) in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Catherine McCarthy Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Catherine McCarthy'.

Catherine McCarthy  
Principal Environmental Health Officer



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**Date:** 22 January 2020

**Our reference:** 1069

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

**Type of Consultation:** Waste Management

**Applicant:** Roadstone Ltd., Fortinstown, Tallaght, Dublin 24

**Location of Facility:** Castleredmond, Middleton Co. Cork

**EPA Reference:** W0307-04

**Classes and Nature of Activity:** RO5 'Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction material' and R13 'storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in Section 5 (1), pending collection, on the site where the waste is produced)'

## Introduction

The following HSE departments were notified of the consultation request for this licence application on 19 December 2019

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

This report only comments on Environmental Health impacts of the licence application as outlined in the documents submitted by the applicant and the adequacy of the licence application from an Environmental Health viewpoint.

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

## General

Roadstone Ltd has submitted a Waste Licence application for a waste soils recovery facility in Midleton, Co. Cork in order to import waste soil and stone material to fill quarry voids. Roadstone Ltd own a quarry located in the townlands of Castleredmond, Carrigshane and Coppingerstown near Midleton, Co. Cork which has only a few years of extraction material remaining. The quarry site is referred to in the application as Zones A, B and C. The entire site area is approximately 15.7 hectares. It is estimated that a total of 2.52m tonnes of material will be imported to the site over a period of 15 years. The site will be monitored for a further three years.

The site has been used as a quarry since 1963 and is located approximately 2km from Midleton town centre (population 12, 496 CSO 2016) and less than 1km from the N25. There are two access points to the site via the L3626 local road (Rocky Road)

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

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

Although it is acknowledged that this application is for a waste recovery activity and not for a waste disposal activity, the EPA's 'BAT **Guidance Note for the Waste Sector: Waste Transfer and Material Recovery**' is the most relevant BAT document against which to review the licence application.

Mr Shane O'Flynn, Environmental Health Officer visited the area on 9 January 2020 to assist in the preparation of this report.

There is no record of any complaints received by the Environmental Health Service in relation to the operation of the existing quarry.

## Site location

The site is located less than one kilometre south east of the N25 Cork Waterford road and less than 2km south east of the town of Midleton. It is approximately 1.4km to the east of the village of Ballinacurra. There are a number of residential dwellings in the vicinity, the nearest of which is approximately 100m to the north- west of the site. Land use in the area is mainly agricultural.

## Public Consultation

An EIA Scoping Report was prepared and circulated to twelve bodies. The responses received are detailed in Table 1.3 'Summary of Responses to Scoping Report'. The Environmental Health Service was unable to locate any evidence of public consultation. It is the experience of the Environmental Health Service that early and meaningful public consultation minimises the risk of future complaints around the operation of a licenced facility.

The Environmental Health Service was unable to determine from the application what provisions, if any, will be put in place to deal with any complaints from members of the public. **It is recommended that the applicant put a procedure in place for communicating with the local community and for responding to any complaints received.**

## Surface Water

The Environmental Health Service has considered any potential risk of contamination of surface water from the proposed activities. Chapter 11.4.5 'Regional and Local Hydrology' states that the 'site is located in the Owennacurra River surface water catchment within the South Western River Basin District'. The southern part of the site drains into the West Ballynacorra Stream the source of which is a karst spring at the south eastern tip of the applicant's land. The licence application states that 'there are no other natural surface water features within the site or in close proximity to the boundary of the site'

There are no proposed discharges to surface water and there is no pathway for surface water to leave the site other than by recharging into groundwater. The site is not located within a flood zone and has not been subject to flooding.

A number of mitigation measures are outlined in Chapter 11.6 'Mitigation Measures' which, if implemented, should minimise the risk of contamination of surface water.

## Ground Water

The subject site is located within the Midleton Groundwater Body, which has been assigned a 'Good' status. The site is underlain by a 'Regionally Important Karstified Aquifer' with a small karst spring at the south eastern tip of the applicant's landholding.

It is noted that the groundwater body does not form part of a drinking water protection area and does not supply drinking water to public or group water supplies. The ground level of the quarry extraction areas and the applicant's landholding is above the water table.

Results of samples from the 6 No. monitoring wells which were drilled around the edge of the existing extraction area indicate exceedences in respect of enterococci and total coliforms (as assessed against the parameters specified in the Drinking Water Regulations SI No. 122 of 2014) and nitrates (as assessed against the parameters specified in S.I. No. 9/2010 - European Communities Environmental Objectives (Groundwater) Regulations 2010). The EIAR accompanying the licence application attributes these exceedences to agricultural activity in the vicinity of the site.

Attachment 7.6.3 'Emissions to Ground Controls' states that 'according to the GSI well database there is only 1 no. registered well within 1km of the proposed site and this well is located to the south of the site'

**It is recommended that an annual sample is taken of the identified well to verify that there has been no change in water quality during the operation of the facility. The sample should be assessed against the same parameters as those identified in the EIAR.**

#### **Emissions to air including noise and dust**

- **Noise**

The Environmental Health Officer who visited the area noted that the L-3626 is used as a busy walking route, even during the winter months.

The primary source of noise will be the movement of trucks on the N25 and on the L-3626 access road (Rocky Road), and from the movement of vehicles within the site, including the tipping of fill materials. There are currently 172 daily truck movements to the site and it is not anticipated that there will be an increase in this rate.

The Noise Impact Assessment of the EIAR states that the haul route passes 30 residences and that the nearest residences in each direction 'are located approximately 100m to the northwest, two properties 230m to the north and one property located 390m to the southeast'. It indicates that baseline noise monitoring was undertaken at four locations in the vicinity of the quarry on 23 and 24 May 2018 in accordance with ISO 1996-1:2003 'Acoustics: Description and Measurement of Environmental Noise –Part 1, Basic quantities and assessment procedures'. Noise measurements were undertaken for 30 minutes at each location. Quarry related noise was audible at all four locations.

The EIAR states that 'the increase in traffic noise levels along the proposed haul routes will not result in cumulative noise impact greater than 1 dB in all instances and this increase is negligible and the resultant impact is typically imperceptible'. It is noted that it is proposed to undertake noise monitoring at four locations on an annual basis.

A number of mitigation measures are included in Attachment 7.5- 'Noise Emissions' and in Chapter 1.5.1 'Construction/ Operational Phase'. **The Environmental Health Service recommends that these are implemented in full and that the mitigation measures are included as conditions of the licence.**

- **Dust**

Attachment 7.1.3.1 'Emissions Impact Assessment – Air' states that the existing operations undertake monthly dust deposition monitoring at seven locations around the site and vicinity. The average dust deposition results are listed in Table 1.2 'Average Dust Deposition at the Site' and the results vary from 115mg/m<sup>3</sup>/ day at location D1 to 347mg/m<sup>3</sup>/day at location D4. It is noted that location D4 is at the northern edge of the site and not in the proximity of a sensitive receptor.

The results indicate that all average dust deposition levels at each of the seven monitoring locations are within the TA Luft Air Quality Standards (TA Luft 1986) The EIAR acknowledges that dust generated during the infilling of the quarry is likely to result in a 'medium-Term Slight Adverse'

impact on residential properties to the north west of the site boundary, without additional mitigation.

Proposed mitigation measures are detailed in Chapter 1.6.1 'Dust' of the EIAR. In addition to these measures, the Environmental Health Service recommends that

- **Haul roads are swept on a daily basis**
- **All vehicles leaving the site should pass through the wheel wash facility**
- **The condition of the haul roads (L-2626 and N25) should be inspected daily for soil and dust deposits during the operational phase of the proposed development.**
- **The condition of the haul roads should be checked weekly for damage/potholes. An agreement must be put in place between the local roads authority and the applicant for the on-going maintenance of haul roads during the operation of the proposed development. Any damage/potholes identified should be repaired within 24 hours of identification.**
- **Vehicles and machinery should be inspected weekly and defects should be rectified within 24 hours of identification**
- **Due to the nature of the material being brought on site, every truck hauling material from the site should be covered with electric trailer covers or tarpaulin. The covering of trucks should not be limited to periods of dry weather.**
- **Dust monitoring should continue to be undertaken and should be extended to the location of the nearest sensitive receptors.**

## Conclusions

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

- **That the public are informed of the proposal to develop a waste soils recovery facility at the Roadstone quarry in Midleton. Meaningful public consultation should be undertaken.**
- **A system for recording and responding to complaints from the public and for communication with the local community should be put in place**
- **Annual monitoring of the private well identified in the EIAR is undertaken to ensure that there is no change in water quality attributable to the site activities**
- **All noise mitigation measures detailed in the EIAR accompanying the licence application are implemented in full. This is to minimise significant impacts to public health**
- **That mitigation measures to protect public health from the significant impacts of dust, as recommended above, are implemented.**



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