Submission	
Submitter:	Mrs Elish O'Reilly
Organisation Name:	HSE
Submission Title:	HSE Submission Report
Submission Reference No.:	S005962
Submission Received:	29 January 2020
Application	
Applicant:	Dublin Aerospace Limited
Reg. No.:	P1121-01
See below for Submission details. Attachments are displayed on the following page(s).	

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24/01/2020

Environmental Licensing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
PO Box 3000 Johnstown Castle Estate,
Co. Wexford

ID Number: 1081

Applicant: Dublin Aerospace Limited
Location of Facility: Ashbourne Industrial Estate, Ashbourne, Co. Meath, A84 ND23.
EPA Reference No: P1121-01
EHIS Ref No: 1081

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. If you have any queries regarding this report, the initial contact is Elish O'Reilly, Principal Environmental Health Officer who will refer your query to the appropriate person. The following HSE departments were made aware of the consultation request for the proposed development on 6th January 2020:

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

Environmental Health Report

The EH service response to the proposal is in the attached consultation report.
• The assessment is based on documentation submitted to this office on 06/01/2020 by the Environmental Protection Agency.
• A site visit was conducted on 1 August 2019.
• Environmental Health were not included at the Screening stage of this application.
• 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:

Construction;
Groundwater and Surface Water;
Waste;
Noise;
Air;
Climate.

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Elish O'Reilly, Principal Environmental Health Officer.

Yours Sincerely,

Elish O' Reilly

Elish O'Reilly
Principal Environmental Health Officer

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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24th January 2020

Ms. Elish O'Reilly
Principal Environmental Health Officer
Co. Clinic
Navan
Co. Meath

Re: Application for Industrial Emissions Licence

Applicant:	Dublin Aerospace Limited
Location of Facility:	Ashbourne Industrial Estate, Ashbourne, Co. Meath, A84 ND23.
EPA Reference No:	P1121-01
EHIS Ref No:	1081

Class and 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 30m³.*
The manufacture or use of coating materials in processes with a capacity to make or use at least 10 tonnes per year of organic solvents, and powder coating manufacture with a capacity to produce at least 50 tonnes per year.

This report only comments on Environmental Health Impacts of the proposed development as outlined in the documents submitted by the applicant and the adequacy of the licence application from an EH viewpoint. We have made observations and submissions on the following specific areas:

Description of Project

Dublin Aerospace Ltd currently operate a facility at Hangar 1, Dublin Airport under EPA licence No: P0480-02. The purpose of this application is to move an aircraft landing gear overhaul and maintenance facility from Hangar 1 in Dublin to this new facility in Ashbourne. The proposed construction works consist of the re-fitting and refurbishment of an existing industrial premises on the site at Ashbourne to make it suitable for it's intended use.

The operation of landing gear overhaul, consists of the renovation of used landing gear from various airlines, disassembling, stripping the gear down to it's components, removing existing finishes to leave bare metal, subsequent inspection of components for damage, such as metal fatigue, repairing any damage identified, and finally, the reapplication of the protective and functional finishes. Planning permission was received for the development from Meath County Council on 23rd September 2019.

Site Location:

The location of the proposed development is Ashbourne Industrial Estate, to the northwest of Ashbourne Town Centre. The site is 2.27 hectares in area and contains a single industrial building of 5,674m^2 which has been vacant since 2006. The R135 lies 0.08km to the north/north west of the site, and the M2 lies 0.36km west of the site. The facility is surrounded by industrial and commercial units to the north, south and east although it is screened by tall trees to the east. The Ballybin Road runs to the west of the facility.

An Environmental Exit Audit Report was completed as part of the previous tenant's cessation of operations at the site. According to the report there were no reported historical releases of chemicals or fuels to soils, groundwater, surface water or wastewater systems associated with activities at the site. There was some contaminated soil present on decommissioning, which was removed and disposed of offsite.

Construction:

The applicant states that the proposed construction activities on site will be limited and mostly relate to the installation of attenuation areas and service utilities on site. Potential impacts relate to the excavation of soil and associated dust generation. Surface water runoff may become silt laden or contaminated with exposed soils. Noise from site preparation work, building maintenance or repair work and the operation of vehicles may also have a potential impact. The EIAR advised that the impact of noise from the construction phase will be short term and negligible. The report states that there shall be minimal waste generated during the construction phase of the proposed development.

Noise:

Screening was carried out on the proposed development site to determine if it was on or near a 'quiet area'. The applicant stated that the proposed development will be located within an industrial estate and close to both the N2 roadway and M2 motorway. The applicant advised that the proposed location is impacted by environmental noise which gives rise to a high background noise level. Noise maps submitted by the applicant show environmental noise levels of greater than 75dB being recorded on the M2 Motorway which is located 407.7m from the proposed development. It should be noted that the strategic noise maps do not show a noise impact from the motorway on the proposed development site and the applicant did not carry out noise monitoring to establish the baseline noise levels at the site.

Just one dwelling or noise sensitive location was identified by the applicant, located west of the proposed development (75m approx.) and the motorway (270m approx.).

The applicant states that the majority of equipment will be fully enclosed within the site buildings. The report advises that noise from the processes and activity associated with the proposed development should not give rise to a noise nuisance beyond the building's façade. The primary noise impacts are predicted to be due to:

- An air handling unit and compressor (located outside the building) and;
- traffic related noise

The air handling unit will be housed within an aluminium penta-post frame and double skin insulated panels, the report states that this structure will give excellent sound reduction. Noise from both the air handling unit and the compressor was predicted and graphed using a Sound Propagation Level Calculator to estimate the resulting sound impact at NSL1. This assessment did not predict the generation of any significant noise from the units.
No traffic routes are predicted to experience increases of more than 25% in total traffic flows during the operational phase and traffic therefore is not predicted to generate a noise impact.

The report states that any noise limits imposed will be complied with by the developer. Noise monitoring will be carried out to ensure that these emission limits are not exceeded during site operations.

Surface & Groundwater:

The site area is located on a locally important aquifer with groundwater vulnerability in the area listed as moderate. A site walkover and survey were undertaken by Enviroguide Consulting in July 2019. There are 10 groundwater supply wells and springs recorded within a 2km radius of the site. There are no groundwater source protection areas within the site and the closest is the source protection zone for the Curragha source located 2.5km northwest of the site boundary. There is also a groundwater well on-site, which is part of the original Polyglass Ltd. facility infrastructure. It is understood that during decommissioning the on-site groundwater well was secured to protect the groundwater beneath the site.

The flood risk assessment for the site was undertaken in accordance with the 2009 DEHLG/OPW Guidelines on Flood Risk Management by EirEng Consulting Engineers. It was determined that the site is not considered to be at risk of flooding. The Dunshaughlin Stream is located c.0.8km south of the project site. Surface water runoff currently exits the site unrestricted and unattenuated.

There will be no discharges to surface water from the operation of the proposed development. Surface water runoff from the site will discharge via Irish Water public surface water sewer. There will be no discharges to groundwater from the operation of the proposed facility.

All wastewater from the facility will be directed to Irish Water public sewer. A new gravity foul drainage network will replace the existing foul water network, which will be made redundant as part of the proposed works.

Emissions to the sewer from the proposed development will include rinsewater from the industrial processes and it is likely there will be traces of chemicals, grease and oil. All process and sanitary wastewater will be discharged directed to an existing Irish Water manhole on the eastern boundary through an oil interceptor. Emissions to the public sewer will be monitored as per the conditions set by the EPA licence.

It should be noted that emissions to the public sewer from the applicant's current operation at Hangar 1, Dublin Airport have had exceedances regarding trade effluent. The applicant stated they believe that these have arisen from handling of parts as they move between different tanks which may lead to cross contamination. The report advises that Best Available Techniques (BAT) will be used in the design of the proposed facility to reduce cadmium and chromium in the trade effluent discharge to sewer. It is recommended that measures to reduce traces of copper; nickel and cyanide are also implemented. The report states that an Irish Water Pre-Connection Application has been submitted and is currently being processed by Irish Water.

A cadmium recovery unit and a closed loop system for degreasing will also be in operation on the site. It is understood that these systems will not be connected to the main drainage network and will not discharge to the public sewer. Hazardous process wastes will be disposed of off-site.

Surface water run-off from the proposed development will be collected in a new surface water drainage network and will fall by gravity to a split attenuation system located underneath an existing car park and open landscaped area. The surface water outfall from the site will be limited to a greenfield runoff rate by a flow control device before connecting into an existing public surface water sewer. A petrol/oil inceptor will be installed along the surface water collection network to mitigate against the risk of hydrocarbons discharging to the public surface water sewer

The report states that monitoring of wastewater discharges from the site will be carried out in conjunction with the proposed EPA Industrial Emissions Licence and pollution prevention controls will be put in place to safeguard the receiving water environment.

Air:

The main emissions associated with the activity will arise from the process of plating, spray painting and the natural gas boilers. To predict the impact on the local environment the emissions were modelled using AERMOD dispersion modelling software, in line with The EPA AG4 Air Dispersion Modelling Guidance Note. The proposed site falls into the 'Zone D' category based on the EPA Clean Air for Europe Directive. Balbriggan was the closest location for air model data.

Modelling of the air emissions has predicted that all emissions will be within the guideline limits set for human health. Emission points will be monitored to ensure compliance with emission limit values.

Waste:

Both hazardous and non-hazardous waste materials shall be generated at the facility. Wastes shall include materials stripped from aircraft parts, products and solvents used in the stripping and refurbishment processes, in addition to by-products of these processes e.g. batteries, oils and lubricants, etc. Municipal waste will also be generated from the site offices and canteen. All wastes generated on site shall be stored in appropriate containers prior to being sent for recycling, recovery or disposal to a suitably licenced or permitted waste contractor.

Climate:

Road traffic as a result of the development will be a source of additional greenhouse gases. The report states that the increase in traffic in Ashbourne will correspond with a decrease in traffic at the facility in Dublin Airport. The report states that adequate bicycle storage facilities will be provided which is a welcome initiative. The applicant advises that employees will be encouraged to use public transport where available and to share transport to work. There is no information given on viable transport plans which would promote sustainable forms of transport to the development.

The activities carried out during the operational phase of the development have the potential to give rise to atmospheric emissions which may subsequently generate indirect GHGs as a result of atmospheric oxidation of volatile organic compounds. Two boilers and a combined heat and power plant will be installed at the proposed facility which will generate very low levels of greenhouse gases. The applicant states that all emissions to the atmosphere will be as per the permitted limits and will be controlled and monitored. The applicant advises that the proposed development is located within the heart of an established Industrial Estate, replacing a similar facility on a like-for-like basis

Conclusions:

1. It was noted that emissions to the public sewer from the applicant's current operation at Hangar 1, Dublin Airport have had exceedances regarding trade effluent. It is recommended that the applicant implements further measures to ensure the reduction of trace elements in the effluent discharged from the proposed facility.

2. In light of the current climate emergency, as declared by the Dail, the applicant should make every effort to further reduce or offset any carbon emissions generated by the proposed development. Options for further energy reduction, renewable energy sources, water conservation measures or green infrastructure should be explored by the applicant. A viable travel plan for employees, highlighting sustainable modes of transport to and from work should also be implemented.

Lisa Maguire

Lisa Maguire
Environmental Health Officer

Carmel Lynch

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Environmental Health Officer