



### Submission

Submitter:	Mr Gerry Leen
Organisation Name:	Environmental Health Services
Submission Title:	HSE submission report Beckman Coulter Ireland Inc, EHIS 1151, EPAP1131-01
Submission Reference No.:	S006062
Submission Received:	28 May 2020

### Application

Applicant:	Beckman Coulter Ireland Inc.
Reg. No.:	P1131-01

See below for Submission details.

Attachments are displayed on the following page(s).

For inspection purposes only.  
Consent of copyright owner required for any other use.

**Industrial Emissions Licence Application  
HSE Submission Report  
Environmental Health Service Consultation Report**

**Date:** 28 May 2020

**Our reference:** 1151

**EPA reference:** P1131-01

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

**Type of Consultation:** Industrial Emissions Licence Application

**Applicant** Beckman Coulter Ireland Inc., Lismeehan, O'Callaghan's Mills, Ennis, Clare

**Nature of Activity:** 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, not included in paragraph 12.2.1.

## Introduction

The following HSE Departments were notified of the consultation request for the licence application on 23 April 2020

- Emergency Planning – Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Maria Bridgeman

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

## General

Beckman Coulter Ireland Inc. has applied to the EPA for an Industrial Emissions Licence (P1131-01) as the company has expanded the process operations on site to accommodate a new Urine Analysis (UA) project which has been installed and commissioned at its plant near O'Callaghan Mills in Co. Clare. As part of this process, solvent consumption will increase to above 10 tonnes per year for coating activities. The new Urine Analysis line will involve the use of four solvents – Methanol, Ethanol, Propanol-1 and Toluene.

As this activity is in excess of thresholds set for a Class 12.2.1 activity an application for 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 investigations/measurements were undertaken in the review of the application.

**The Environmental Health Service has not received any complaints concerning the existing Beckman Coulter 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 and ground water
- Emissions to air including noise, dust and process emissions

Rory O'Dea, Senior Environmental Health Officer visited the area in which the facility is located on 28 April 2020 to assist in the preparation of this report.

The material submitted in the licence application and supporting documentation were reviewed with regard to the 'BAT Guidance Note for Solvent Use in Coating, Cleaning and Degreasing' EPA 2008.

### **Site Location**

The Beckman Coulter facility is located on a site of approximately 300 acres in rural Co. Clare, about 20km east of Ennis, 6km from Tulla and 5km from O'Callaghans Mills. The facility is surrounded by agricultural land which is currently farmed. McGrath's Quarries facility is located approximately 50m south east of the Beckman Coulter plant.

### **Surface Water and Ground water**

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

The 'Emissions Overview' (Section 7.1 Application Form) indicates that there is one main treated effluent discharge point from the facility. The Non-Technical Summary details the stages involved from the generation of process waste to its eventual discharge to ground or removal off site for treatment. Chapter 1.2 'Process Water' of the Main Emissions Report states that 'process water from Beckman is collected completely separately from sewage and canteen waters'

It is noted that process waste from the washings of tanks and process lines from these tanks are managed by Beckman Coulter under three headings

1. 'Lyse III' waste is waste generated from the manufacture of the eponymous Beckman Coulter product. This is an entirely segregated system which is flushed to a Lyse III holding tank, from where it is collected and removed off site for treatment
2. 'First Wash' is chemical waste collected from the washing of equipment which comes in direct contact with raw materials. This waste, which is classified as hazardous, is stored in two chemical waste storage tanks prior to collection and removal for disposal by a licenced waste collector.
3. 'Second Wash' arises from the final rinsing of the equipment with deionised water, which is directed to an open top tank (P1) and a balancing tank (P2)
4. Waste water from the staff sanitary facilities and from the canteen is treated in two on site wastewater treatment plants separate to the process wastewater. The discharge of effluent from the wastewater treatment plants is subject to a separate licence issued by Clare County Council in 2018.
5. Storm water from building roofs, the car parks, roads and yard areas is collected and passes through a hydrocarbon interceptor prior to being discharged to a small stream which drains to Craggaunkeel Lake

**The Environmental Health Service (EHS) has studied the Process Wash Water Flow Diagram contained in the Non-Technical Summary and the detailed description of the treatment of the Process Wash Water included in the Main Emissions Report. The EHS is satisfied that mitigation measures are in place to ensure that the quality of the process wash water eventually discharged into the stream between Craggaunkeel Lough and Rosslara Lough does not present a significant risk to public health.**

**It is recommended that the hydrocarbon interceptor and all hard standing areas are visually checked on a monthly basis and any damage or cracks are repaired as they are identified. A record should be kept of all visual inspections and any maintenance undertaken.**

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

#### **Noise**

- a) The facility is located in an area which is predominately rural. The only other large scale commercial or industrial activity in the vicinity is McGrath Quarries. It is not situated in an area designated as a 'Quiet Area'.
- b) Three noise sensitive locations have been identified – one woodland area 200m west of the Beckman Coulter facility, an occupied bungalow 700m to the north and a farmhouse located beside a wooded area approximately 200m north east of the facility.

- c) No equipment or processes have been identified which are likely to result in vibration impacts during the operational phase of the development.
- d) Axis Environmental Services undertook baseline noise monitoring at the three identified NSLs at various times on 3 and 4 March 2020. Noise assessments were based upon procedures set out in the 'International Standard, ISO 1996 (Acoustics – description and measurement of environmental noise)' and on guidance (NG4) published by the Irish EPA in 2016.
- e) The predominant noise from the existing facility was found to be from extractor fans located on the north facing side of the facility. Noise from the extractor fans was detected, to some extent, at NSLs 1 and 3 during the daytime, evening and night time surveys.
- f) No tonal or impulsive noise was detected at any of the noise monitoring locations.
- g) The noise monitoring survey indicated that the monitoring points were compliant with NG4 noise emission limit values for daytime, evening and night time.

### Dust

From information provided in the Licence Application Form there are no current or proposed dust generating emissions from the facility.

### Process Emissions

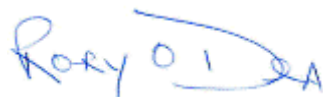
The Emissions Overview section of the Licence Application Form indicates that there is one emission point to air. An RTO (Regenerative Thermal Oxidiser) has been commissioned which captures all solvent emissions within the process area, which are then treated. Table 4-1 'Compliance Scheme' of the Solvent Directive Report which accompanies the Licence Application Form describes the process and estimates that fugitive emissions from the plant will be less than 1%.

**The Environmental Health Service recommends that the applicant agrees a timescale with the EPA for the installation of the RTO which is included as a condition of the licence.**

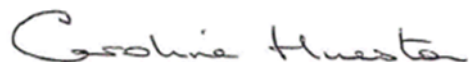
### Conclusions

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

- the hydrocarbon interceptor and all hard standing areas should be visually checked on a monthly basis and any damage or cracks are repaired as they are identified.
- records should be kept of all visual inspections and any maintenance undertaken
- a timescale for the installation of the RTO should be agreed between the EPA and the applicant and should be included as a condition of the licence
- 



Rory O'Dea  
Senior Environmental Health Officer  
HSE West  
Unit 6 Quin Road Business Park  
Quin Road  
Ennis  
Co. Clare



Environmental Health Officer  
Environment OU  
Ennistymon Health Centre  
Ennistymon  
Co. Clare

An tSeirbhís Sláinte Comhshaoil  
Feidhmeannacht na Seirbhíse Sláinte,  
Ionad 6, Páirc Ghnó Bothar Chuinche,  
Inis, Co. An Chlár.

Environmental Health Service,  
Health Service Executive,  
Unit 6, Quin Road Business Park,  
Ennis, Co. Clare.

☎ (065) 6706660

**Date:** 28<sup>th</sup> May 2020

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

**Re:** Industrial Emissions Licence Application Reference: P1131-01

**Name and Address of applicant:** Beckman Coulter Ireland Inc., Lismeehan, O'Callaghan's Mills,  
Co. Clare

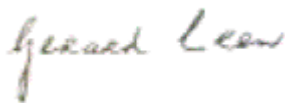
**EHIS Reference:** EHIS 1151

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above licence application.

If you have any queries regarding any of this reports the initial contact is Mr. Gerard Leen, undersigned, who will refer your query to the appropriate person.

Yours faithfully,



---

Gerard Leen  
Principal Environmental Health Officer