Submission	
Submitter:	Mr Andrew Curtin
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission
Submission Reference No.:	S006232
Submission Received:	18 December 2020
Application	
Applicant:	Valcroft Unlimited Company
Reg. No.:	P1136-01
See below for Submission details. Attachments are displayed on the following page(s).	

Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
Health Service Executive West
Ashbourne Hall
Ashbourne Business Park
Dock Road
Limerick
V94 NPEO
T: 00353 (0)61 461502 / 04 / 05

Seirbhíse Sláinte Comhshaoil
Halla Ashbourne
Páirc Gnó Ashbourne
Bóthar an Duga
Luimneach
V94 NPEO
T: 00353 (0)61 461502 / 04 / 05

Date: 23 December 2020

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

Re: Industrial Emissions Licence Application P1136-01

Applicant: Valcroft Unlimited Company, Mr Binman, Block 1, Ashbourne Business Park, Dock Road, Limerick

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 Andrew Curtin, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Andrew Curtin
Principal Environmental Health Officer

Industrial Emissions Licence Application

HSE Submission Report

Environmental Health Service Consultation Report

Date: 23 December 2020

Our reference: 1462

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

EPA Reference: P1136-01

Type of Consultation: Industrial Emissions Licence Application

Applicant: Valcroft Unlimited Company, Mr. Binman, Block 1, Ashbourne Business Park, Dock Road, Limerick

Nature of Activity: (11.1The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.

(11.4 (b) (ii)) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001(S.I. No. 254 of 2001) apply): pre-treatment of waste for incineration or coincineration;

(11.4(b) (i)) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more

of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I No. 254 of 2001) apply): biological treatment; when the only waste treatment activity carried out is anaerobic digestion, the capacity threshold for this activity shall be 100 tonnes per day.

Introduction

The following HSE Departments were notified of the consultation request for the licence application on 24 November 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

Valcroft Unlimited Company (trading as Mr Binman) was granted a ten year Planning Permission (Limerick City and County Council Planning Reference 16/642) in January 2017 to construct a waste recycling facility at Ballykeeffe, Dock Road, Limerick. The facility is operated under a Waste Permit granted by the Council (Reference WFP/L/2019/203).

Planning consent authorised the progressive development of a large scale Materials Recovery Facility (MRF) at the site which will have an annual waste intake of 90,000 tonnes.

Valcroft Unlimited Company has applied to the EPA for a licence for the facility which, when completed, will include

- an office
- main processing building
- construction and demolition waste processing area
- maintenance garage
- weighbridges
- storage bays
- a civic amenity area and
- ancillaries

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.

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

- Any potential contamination of surface water
- Any potential contamination of ground water

- Emissions to air including noise, odour and dust

The Environmental Health Service notes that a number of BAT documents were referenced as part of a review of the facility, including

- 'Best Available Techniques (BAT) Reference Document for Waste Treatment 2018'

This is the most relevant document against which to review the licence application.

Site Location
The proposed Valcroft Unlimited waste recycling facility will be located on a 4.04 hectare brownfield site approximately 3km west of Limerick City in the townland of Ballykeeffe. It is accessed via the R510 Dock Road and is 0.3km east of Junction 2 of the N18. The facility is located adjacent to the Limerick City wastewater treatment plant to the west and the Docklands Industrial Estate to the east in an area which is largely industrial and commercial and is zoned for industrial purposes. Ballinacurra Creek, which is a tributary of the River Shannon, is separated from the applicant site by the Docklands Industrial Estate.

There are no residential dwellings in the immediate vicinity of the Valcroft site.

Public Consultation
Chapter 4 'Project Scoping' details the public bodies and state agencies consulted during the EIA Scoping process and summarises the responses received.

Chapter 2.3 of the EIAR 'Site Description and Context' states that the site is 'located within a primarily industrial / commercial area and is zoned for industrial purposes' and that the majority of the population reside 'a considerable distance' from the site. Chapter 6.3.4 'Settlement and Location of Neighbours' states that the 'closest residence to the site is a 'one off' house located 200m south west of the site. Other residential properties in proximity to the site include an apartment block located some 1km south east of the site and a residential estate off South Circular Road some 1.1km south east of the site'.

Although it is acknowledged that consultation has been undertaken with statutory and non-statutory agencies and that the public had an opportunity to make submissions regarding the proposal at the planning application stage, 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. It is also good practice to ensure that a designated member of staff has responsibility for dealing with complaints and queries from members of the public. It is recommended that the public are informed of the proposed development and updated on progress. The existing 'Mr Binman' website (www.mrbinman.com) may be used for this purpose.

Surface Water
The Environmental Health Service has considered any potential risk of contamination of surface water from the proposed activities. Form 7.1 'Emissions Overview' indicates that there will be no emissions/discharges to surface water from the proposed development and that there will be one storm water emission point.

The Valcroft Operational Report 2020 indicates that there are three separate surface water collection systems. Uncontaminated run-off from paved areas will be collected and channelled 'through a series of silt traps and Class 1 full retention oil interceptors into a flow attenuation

system', the capacity of which is 1200m^3. The attenuation system will be channelled to an existing surface water drain at the north east corner of the site that connects to Bunlicky Lake.

The Operational Report also states that run off from roofs will be harvested and stored in an underground holding tank. It will be used for the washing of trucks and in the bin/skip cleaning area.

Surface water run-off from hard standing areas which is at risk of contamination will be collected and discharged to the foul sewer.

Chapter 9.6.2 'Hydrology and Hydrogeology -Construction Phase' outlines the measures to be employed to minimise potential impacts from the spillage of oils, solvents and paints. These products will be stored in temporary bunded areas.

Designated areas will be assigned for the storage of oil and fuel storage tanks which will be bunded with adequate bund provision to contain 110% of the largest tank capacity. Drainage from the bunded areas shall be collected for safe disposal.

Where possible, refuelling will take place off site, otherwise refuelling will be carried out in a designated area. Personnel will be trained in the use of spill kits and hydrocarbon absorbent packs, which will be stored in the designated area.

An adequate supply of spill kits and hydrocarbon adsorbent packs will be stored in this area. All relevant personnel will be fully trained in the use of this equipment

The Environmental Health Service recommends that all hard standing areas used for refuelling vehicles should drain to Class 1 Hydrocarbon Interceptors prior to discharge.

Wastewater from the site will discharge into the mains drainage system for treatment in the Limerick City Wastewater Treatment Plant and the site will be serviced by the public water supply. Mitigation measures have been incorporated into design factors in the development of the site surface water and foul sewerage disposal design process and these measures are detailed in Chapter 10 'Water Infrastructure' of the Non- Technical Summary of the EIAR.

Detailed mitigation measures to be employed during the operational phase of the proposed facility are included in Chapter 9.6 'Remedial and Mitigation Measures'.

It is recommended that these measures are included as conditions of the licence to minimise the impact on water quality and to protect public health. It is further recommended that in addition to the monitoring specified in 'Appendix 7.7 - Discharges to Storm Water – Attachment' monitoring of stormwater discharge to the surface water stream is undertaken following periods of significant rainfall and flooding.

Ground Water

The proposed development is located within the Shannon River Basin District (SRBD) under the Water Framework Directive (WFD). The nearest watercourse is the River Shannon which is located approximately 600m north of the site and is tidal in the area in which the proposed facility is located.

The site contains a number of drainage ditches which flow along its southern and western boundaries. A further ditch also crosses the centre of the site which is connected to the drainage

ditch along the western boundary. All surface water flows offsite at the north western corner from where it discharges to Bunlicky Lake.

There is no EPA water monitoring station located along the River Shannon in the vicinity of the Valcroft site. The Shannon Estuary (Limerick Dock) in the area of the site was assessed under the Water Framework Directive programme and was classified as being of 'moderate' status and 'at risk of not achieving good status.'

Chapter 9 'Hydrology and Hydrogeology' indicates that the proposed site is situated in the Limerick City Groundwater Body which has been assigned 'good' status. Analysis of GSI data has indicated that there are eight wells/boreholes located within 3km of the proposed site. The bedrock aquifer in the vicinity of the site is not used as a drinking supply as it is saline. The wells and boreholes are used for agricultural and industrial purposes. The proposed site is served by a public water scheme.

Chapter 9.1 'Water Supplies' states that 'there are no public water supplies sourced from groundwater in the area and there are no groundwater Source Protection Zones in the vicinity of the site according to the EPA & GSI (2015) online database'

The EIAR states that there are no sensitive receiving water sources in the vicinity of the site and that 'there will be no direct discharge to the underlying hydrogeological environment during the operational phase'. A Flood Risk Assessment is included in the EIAR which includes the mitigation and management of Flood Risk.

Emissions to air including noise, dust and odour

Noise

The site is located in the primarily industrial area of the Dock Road on the outskirts of Limerick City. Land use in the area is dominated by industrial and commercial activities with some greenfield sites bordering the location of the proposed development. The closest dwellings are situated off the Ballykeeffe Road and are approximately 180m to the south of the site boundary.

The site is not in an area designated as a 'Quiet Area'. The EIAR states that there are no operational activities which would give rise to vibration off site.

Chapter 12 of the EIAR (Noise and Vibration) states that baseline noise monitoring was undertaken at the site in 2016.

Eight noise sensitive locations have been identified within 1.1km of the proposed site, the nearest of which is 200m to the south of the site. Included were domestic dwellings, including an apartment block; a location to the north end of Bunlicky Lake; a location to the south end of Bunlicky Lake; Ballinacurra Creek (included in a Special Protection Area) and at the site of a medical centre and a proposed private hospital located 35m to the south of the site boundary.

Attended noise measurements were undertaken at three of the NSLs (occupied dwellings) during the periods

- Daytime 13:10hrs to 16:30hrs on 11 May 2016
- Evening 19:00hrs to 20:15hrs on 11 May 2016
- Night-time 23:00hrs on 11 May to 01:15hrs on 12 May 2016

The results of noise monitoring undertaken on May 11th and 12th 2016 are included in Tables 12.1-12.3. Noise from traffic passing along the Dock Road and the Ballykeeffe Road dominated the noise environment at NSL 1 (Ballykeeffe Road) during the daytime and evening. Background noise levels at this location ranged from of 45 to 47dB LA_{90}.

Night time noise was also dominated by traffic noise with some faint plant noise noted. Night time noise levels at NSL 1 were in the range of 35 to 39dB LA_{90}.

NSL2 is a development of residential apartment blocks located over 1km north-east of the proposed site boundary. Day and evening noise monitoring recordings at this location was dominated by a plant facility located to the west of the apartment development and road noise. Background noise levels in this location were in the range of 44 to 46 dB LA_{90}.

Plant noise from the same facility also dominated the night time noise environment at this location where background noise levels were in the range of 44 to 45dB LA_{90}.

NSL3 which is a residential estate located approximately 1.1km to the south of the proposed site the sound of distant traffic dominated the noise environment during day time and evening and background noise levels were in the range of 39 to 41dB LA_{90}. Faint plant noise was recorded during night time monitoring where background noise levels were in the range of 35 to 37dB LA_{90}.

Predicted noise levels during the operational phase are detailed for two modelling scenarios. The Environmental Health Service emphasises that it is the level of change in the noise environment rather than the actual noise level which is likely to have the greatest impact on sensitive receptors.

The Environmental Protection Agency's document "Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)" sets limit values for noise from licenced sites. **The Environmental Health Service emphasises that these values are maximum limits and recommend that best practice is adopted to ensure that noise levels from the proposed facility are minimised through design and mitigation.**

In order to protect public health from any potential significant impacts from noise it is recommended that

- **Hard standing areas used for truck access and manoeuvring must be visually inspected on a weekly basis and repairs undertaken within 24 hours**
- **Truck maintenance should not be carried out if the shutter doors are open**
- **Idling of trucks should only take place in exceptional circumstances**
- **Members of the public using the Civic Amenity Site should be requested to switch off vehicle engines when using the facility**
- **Minimisation of noise should be a criterion for the selection and installation of compactors and fork lift trucks**
- **The inside of the glass bin/hopper should be lined with noise dampening material**
- **The area in which the crusher, shredder and loader are located should be fully enclosed**
- **Drop heights should be minimised when unloading vehicles**

Odour
Chapter 11.1'Air Quality and Climate' of the EIAR states that 'the key impact from the facility will be odour emissions which have the potential to cause odour nuisance at nearby receptors 'Application Form 7.4.1 Emissions to Atmosphere – Main and Fugitive Emissions' indicates that there will be one main emission point to atmosphere (A1) from an odour control unit located in the waste transfer building. This unit comprises a dust unit and an activated carbon filter and will vent to atmosphere through a 20m stack. This building will operate under sufficient negative pressure to ensure that fugitive odour release will be minimal.

Air dispersion modelling was undertaken using the AERMOD dispersion model. The EIAR concludes that 'an odour nuisance will not occur at any nearby sensitive receptors' It is noted that fugitive odour emissions may occur as a release of odours from the main process building during the delivery and shipment of waste.
As well as the odour mitigation measures are outlined in Chapter 11.6.2 Remedial and Mitigation Measures Operational Phase' **the Environmental Health Service recommends that all odour control and monitoring plant and equipment is subjected to a bi-annual maintenance inspection.**

The mitigation measures included in Chapter 11.6.2 of the EIAR should be included as conditions of the licence. In addition to these conditions, **it is recommended that a weekly odour monitoring programme is undertaken at the site boundary during the summer months to verify the effectiveness of on- site odour mitigation measures**

Dust
The site of the proposed development lies within the EPA's Air Quality Zone C.
EPA Application Form 7.4.1' Emissions to Atmosphere –Main and Fugitive Emissions' predicts that there will be fugitive emissions to air from dust from 'movement of vehicles and processing of waste' which will be within the TA Luft dust deposition limit value of 350mg/m^2/day averaged over a 30 day period.

The Environmental Health Service notes that the EIAR (Chapter 11.6.1) specifies a number of mitigation measures to minimise dust emissions on site during the construction phase. It is recommended that these mitigation measures are applied during the operational phase of the facility in order to minimise any significant impacts arising from dust on site. In addition to the mitigation measures outlined, it is recommended that a wheel wash is used at the site access during extended periods of dry weather

Cumulative impacts
The cumulative impacts of the proposed development and existing industrial facilities located on the Dock Road were considered in Chapter 16.4 of the EIAR. It is concluded that 'the proposed development and other neighbouring developments could have potential implications on environmental variables relating to traffic and noise' which have been addressed in individual sections of the EIAR.

Pest Control
The issue of pest control is addressed in Chapter 4.15 of the Operational Report where it is stated that in addition to the daily inspection of the facility for nuisances including vermin, birds and flies, Valcroft will 'retain the services of a pest controller who will carry out preventative pest and vermin control measures'. **It is recommended that written documentation relating to pest control measures is retained.**

Conclusion

The Environmental Health Service makes the following recommendations in respect of this proposed development

- **The public is kept informed of the proposal. This can be done through the existing company website or through social and /or traditional media**
- **All hard standing areas used for refuelling vehicles drain to Class 1 Hydrocarbon Interceptors prior to discharge.**
- **Detailed mitigation measures to protect water quality which are included in Chapter 9.6 'Remedial and Mitigation Measures' of the EIAR are included as conditions of the licence**
- **The monitoring of storm water discharge to the surface water stream is undertaken following periods of significant rainfall and flooding.**
- **Measures to minimise the impact of noise on sensitive receptors are adopted including**
    - **Hard standing areas used for truck access and manoeuvring must be visually inspected on a weekly basis and repairs undertaken within 24 hours**
    - **Truck maintenance should not be carried out if the shutter doors are open**
    - **Idling of trucks should only take place in exceptional circumstances**
    - **Members of the public using the Civic Amenity Site should be requested to switch off vehicle engines when using the facility**
    - **Minimisation of noise should be a criterion for the selection and installation of compactors and fork lift trucks**
    - **The inside of the glass bin/hopper should be lined with noise dampening material**
    - **The area in which the crusher, shredder and loader are located should be fully enclosed**
    - **Drop heights should be minimised when unloading vehicles**
- **All odour control and monitoring plant and equipment is subjected to a bi-annual maintenance inspection.**
- **A weekly odour monitoring programme is undertaken at the site boundary during the summer months to verify the effectiveness of on- site odour mitigation measures**
- **Dust mitigation measures outlined in Chapter 11.6.1 are adopted for the operational phase of the project.**
- **A wheel wash is used at the site access during extended periods of dry weather in order to minimise any impacts from dust from trucks using the facility**
- **Documentation relating to the implementation of pest control measures on site should be retained**

Seamus Kenny
Environmental Health Officer
Newcastle West Health Centre,
Gortboy,
Newcastle West,
Co Limerick

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