

Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	Health Service Executive
Submission Title:	HSE Submission
Submission Reference No.:	S009908
Submission Received:	09 February 2021

Application

Applicant:	Ortec Ncw Limited
Reg. No.:	P1141-01

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.



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: 10 February 2021

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

Re: Industrial Emissions Licence Application P1141-01 at Newcastle
West Business Park, Station Road, Newcastle West, Co. Limerick

Applicant: Ortec Inc Limited, PO Box 1469, 29641, Easley, US

EHIS Reference: 1540

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

Date: 10 February 2021

Our reference: 1540

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

EPA reference: P1141-01

Type of consultation: Industrial Emissions

Applicant: Ortec Ncw Limited, PO Box 1469, 29641, Easley, US

Location of Facility: Newcastle West Business Park, Station Road, Newcastle West, Co. Limerick V42 E765

Nature of Facility: The production of organic chemicals, such as plastic materials, (polymers, synthetic fibres and cellulose-based fibres) (production means the production on an industrial scale by chemical or biological processing)

Introduction

The following HSE departments were notified of the consultation request for this licence application on 14 January 2021

- 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

Limerick City Council granted a ten year Planning Permission (Planning Reference LCC 16/906) to Ortec Ltd for an extension to an existing building located in the Newcastle West Business Park, Newcastle West. Co. Limerick. At the time of the planning application the building was a 'shell' industrial unit, which was unoccupied and not fitted out.

The planning application stated that 'this application relates to development for the purposes of an activity requiring an Industrial Emissions licence'.

The Industrial Emissions Licence Application describes the activity as 'Chemical 5.12 (h) *The production of organic chemicals, such as plastic materials (polymers, synthetic fibres and cellulose-based fibres) (production means the production on an industrial scale by chemical or biological processing)*'

Ortec has three manufacturing plants in the US. The Newcastle West plant, which is situated on a one acre site, will be Ortec's European headquarters.

The Operational Report accompanying the application states that the 'Ortec NCW facility manufactures monomers and polymers, and also blends monomeric and polymeric materials for the medical device and pharmaceutical industry. Raw materials are brought into the plant and are subjected to 'blending and / or synthesising activities and finished products are dispatched for further processing or use'.

Chapter 2.2 'Activities and Uses' of the Non-Technical Summary describe the main elements within the facility as including:

- Warehouse
- Administration
- Staff welfare facilities including canteen
- Laboratory
- Plant utilities
- Process rooms
- External site infrastructure

The Industrial Emissions Licence application is for proposed emissions to sewer, storm water and air.

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 this licence application.

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

- Emissions to surface or groundwater
- Emissions to air including odour and noise

The site in which the proposed facility is located was visited by Mr Seamus Kenny Environmental Health Officer on 4 February 2021 to assist in the preparation of this report.

The Environmental Health Service notes that a number of BAT and BREF documents were referenced as part of the industrial emissions licence application for this facility including

- BAT Conclusion on Common Waste Water and Waste Gas Treatment/ Management Systems in the Chemical Sector (2016/902)
- Best Available Techniques (BAT) Reference Document for Common Waste Water and Waste Gas Treatment/ Management Systems in the Chemical Sector (EUR 28112 EN)
- Best Available Techniques (BAT) Reference Document for Energy Efficiency (February 2009)
- Best Available Techniques (BAT) Reference Document for Emissions from Storage (July 2006).

The above are the most relevant document against which to review the licence application.

Site location

Ortec Ltd is located on a one hectare site in the Newcastle West Business Park which is situated on Station Road at the northern periphery of the town. There are a small number of other occupied units within the Business Park, which is bordered by industrial units to the south and east, with open grassland to the north and the Templegreen housing development to the west. The nearest sensitive receptors are located in this development and are more than 200m from the facility. There are two schools in the vicinity – Gaelscoil O'Doghair and Desmond College. A HSE Primary Care facility is currently under construction on a site located opposite the entrance to the NCW Business Park approximately 250m to the south of the Ortec facility.

The Great Southern Greenway follows the line of the old railway and is located approximately 180m west of the Ortec site.

Groundwater and surface water

The Environmental Health Service has considered any potential risks of contamination of ground and surface water and makes the following comments:

The Ortec plant is on a site of former agricultural land and there is no evidence of previous land contamination. The plant is located approximately 250m south of the River Daar which runs in a north east to south west direction into the River Deel.

The River Deel is the source for the Newcastlewest Public Water Supply which supplies a treated water supply to the town and its environs including the NCW Business Park. The Ortec facility is served by the Newcastle West Public Sewerage Scheme.

Site investigations undertaken by the applicant as part of the EIAR submitted with the planning application indicated that no groundwater wells were identified within a 1km vicinity of the facility and no wells have been identified as providing a drinking water supply to domestic homes in the area.

Attachment 7.1 'Emissions Overview' indicates that there will be no direct emissions to either ground or surface water from the Ortec facility. There are three emission points to sewer and one storm water emission point. A list of the hazardous substances and the quantity used within the facility is contained in Attachment 4.6.2 'Raw Materials, Intermediates and Products'.

Chapter 4.2 'Site Drainage' of the Baseline Report accompanying the licence application indicates that Relevant Hazardous Substances (RHS) used on site 'are all delivered, stored and used in designated areas where there is hard standing'. The Ortec facility does not contain any underground storage tanks.

Following attenuation storm water run-off from the site will discharge into the storm water drainage system. All storm water will pass through a 'Class 1 Full Retention Oil Separator' prior to discharge.

Attachment 7.3.1 'Emissions to Sewer' indicates that there is one process emission point and two emission points from staff sanitary and canteen facilities to the sewer. Proposed monitoring frequency and parameters are detailed in Attachment 7.3.1.

Chapter 4.37 of the Environmental Impact Statement (Attachment 6.2.4) states that 'all tanks, containers and drum storage areas will be designed and bunded in accordance with the EPA guidance 'Storage and Transfer of Materials for Scheduled Activities' (2004)'

The Environmental Health Service recommends that

- the integrity of all bunds are tested within three months of the granting of the IE licence
- Visual inspection of all bunds and pipework is undertaken on a weekly basis and any defects identified should be rectified immediately
- All bunds should be tested every three years

The Environmental Health Service is satisfied that if

- the measures included in Chapter 4.3.7 'Drainage' of the Environmental Impact Statement are implemented in full and
- the parameters specified and the frequency of monitoring of waste water discharges to the public sewer, as outlined in the table included in Attachment 7.3.1 'Emissions to Sewer' are adhered to

these measures should be sufficient to protect public health

Emissions to air including odour and noise

Odour

Chapter 9 'Air Quality and Climate' of the Environmental Impact Statement accompanying the licence application states that 'during the operational phase, the main potential for air quality impacts arise from the combustion of kerosene fuel in the boilers / burners, and other process emissions to air and that 'no odour-generating activities will be carried out on site, and no odorous materials will be stored on site'

Attachment 7.4.1 'Emissions to atmosphere' details the 'measures to reduce/minimise/prevent emissions' as '450kW oil boiler with high combustion efficiency (greater than 90%) and a pressurised combustion chamber to ensure low NOx levels'

Air dispersion modelling has been undertaken and the results indicate that all emissions to atmosphere comply with the relevant Air Quality Standards and that no mitigation measures will be required.

Potential minor emissions to atmosphere are contained in Attachment 7.4.2 and comprise VOCs, inorganics and vapours containing trace process chemicals such as nitrogen. These emissions are regarded as 'trace' and no abatement or mitigation is required.

The Environmental Health Service is satisfied that the processes undertaken in the Ortec facility, if undertaken in accordance with best practice, should not give rise to odour emissions likely to present a significant impact on public health.

Noise

Noise emissions associated with the Ortec plant were identified in Chapter 10 'Noise and Vibration' of the Environmental Impact Statement as being mainly from 'continuous low level noise emissions from the building ventilation and cooling systems and the operation of other industrial plant and equipment, such as compressors and a cooling tower'.

Noise monitoring was carried out at the site on 30 June 2016 in preparation for the planning application for the proposed facility. As it is proposed that the plant will operate 24 hours per day for five days per week monitoring was undertaken during daytime, evening and night time. Noise sensitive receptors have been identified in Chapter 10.7.2.

Noise sources during the operation of the proposed development have been identified as minor additional traffic noise and industrial activities associated with the facility, which are

- Four roof-mounted air handling units (AHUs)
- An air compressor
- A cooling tower

The results of Predicted Operational Noise Levels at Sensitive Receptors for both daytime and night time indicates that there will be no change in the noise environment at the nearest sensitive receptors as a result of the operation of the Ortec facility.

The Environmental Health Service recommends that

- **all new equipment purchased is noise rated and assessed prior to purchase**
- **where possible noisy equipment is located internally or housed**
- **fans and other noise generated equipment is inspected annually and any necessary repairs undertaken**

The Environmental Health Service is therefore satisfied that adherence to the above mitigation measures will minimise the impact of noise from the facility on the nearest sensitive receptors.

Conclusions

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

- The integrity of all bunds are tested within three months of the granting of the IE licence

- Visual inspection of all bunds and pipework is undertaken on a weekly basis and any defects identified should be rectified immediately
- All bunds should be tested every three years
- All new equipment purchased is noise rated and assessed prior to purchase
- Where possible noisy equipment is located internally or housed
- Fans and other noise generated equipment is inspected annually and any necessary repairs undertaken.

Seamus Kenny

Seamus Kenny
Environmental Health Officer
Health Service Executive
Newcastle West Health Centre
Gortboy
Newcastle West
Co Limerick

Grovia Hueston

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

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