

Submission

Submitter:	Mr Gerard Leen
Organisation Name:	Health Service Executive
Submission Title:	HSE submission
Submission Reference No.:	S010072
Submission Received:	25 July 2021

Application

Applicant:	Oled Material Manufacturing Limited
Reg. No.:	P0020-03

See below for Submission details.

Attachments are displayed on the following page(s).

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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: 23rd July 2021

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

Re: Industrial Emissions Licence Application Reference: P0020-30

Name and Address of applicant: Oled Material Manufacturing Ltd., Shannon Industrial Estate,
Shannon, Co. Clare

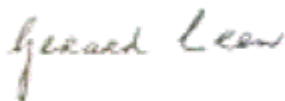
EHIS Reference: EHIS 1830

Dear Sir/Madam,

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

If you have any queries regarding this report, 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

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

Date: 23rd July 2021

Our reference: EHS 1830

EPA reference: P0020-03

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: Oled Material Manufacturing Ltd., Shannon Industrial Estate, Shannon,
Co. Clare

Nature of Activity: The production of basic organic chemicals

Introduction

The following HSE Departments were notified of the consultation request for this licence application on July 1st 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

OLED Material Manufacturing Limited (OM²) has applied to the EPA for a review of its existing Industrial Emissions Licence (P0020-02) as the company wishes to add a new class of activity to its licence. Operations at the site ceased in September 2020 but the facility has an existing Industrial Emissions licence under Class 5.15 'the use of chemical or biological process for the production of basic pharmaceutical products' which it wishes to retain. The new activity which is the subject of the review application comes within Class of Activity 5.12 'The production of organic chemicals'

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 previous operation of this 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 20th July 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 'Best available techniques (BAT) conclusions under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, for common waste water and waste gas treatment/management systems in the chemical sector'

Site Location

The OM² facility is located on an 8.55 hectare site, zoned as 'light industrial' within the Shannon Industrial Estate, Co. Clare, which is located along the N19 in a location which is predominately commercial and industrial. The site is described in the EIAR accompanying the review application as 'a non-functioning pharmaceutical facility with tank farms, production buildings, car park areas, process pipe network and services'.

The closest occupied residential dwellings are located at Tullyglass, which is approximately 77m to the east of the site. Shannon Airport is situated immediately to the west of the OM² facility.

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 documentation submitted with the licence review application states that the pre-existing onsite Wastewater Treatment Plant has been decommissioned as the new site process is a dry, solvent based process which will not give rise to process effluent.

Sanitary waste from the site will be discharged to a Clare County Council sewer via an emission point which has been identified as ES-02.

There are two stormwater discharge points onsite, both discharging into a small open culvert which runs along the northwest boundary of the site and which collects all of the surface waters from the industrial estate which ultimately discharges into the Shannon Estuary to the south of the site.

Both of the stormwater discharge points are subject to sampling and monitoring. **It is recommended that all hard standing areas are visually checked on a monthly basis and any damage or cracks are repaired as they are identified**

The Environmental Health Service recommends that monitoring and sampling continues to be undertaken at these stormwater discharge points as a condition of the licence review.

The Environmental Health Service notes that there are no emissions to ground and that it is intended to reduce the number of licenced groundwater monitoring wells. The Environmental Health Service supports this proposal in the interest of the protection of the environment and reducing any potential impact on the health of the nearest sensitive receptors. It is recommended that these wells are sampled biannually as a condition of the licence review and as proposed in the application.

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

Noise

The Environmental Health Service makes the following observations in respect of noise

- The facility is located in an area which is predominately industrial and commercial. It is not situated in an area designated as a 'Quiet Area'.
- The facility will operate 24 hour/ 7 day per week
- No equipment or processes have been identified which are likely to result in vibration impacts during the operational phase of the development.
- There are no significant noise emissions associated with the facility. The main noise source has been identified as general facility noise associated with extraction fans
- Ambient noise monitoring is carried out at one noise sensitive location
- The facility is located adjacent to the run way at Shannon Airport which impacts considerably on background noise levels

The Environmental Health Service recommends that noise monitoring continues to be undertaken at the location of the nearest noise sensitive receptor and that the extractor fans are included in an annual maintenance plan for the facility.

Emissions to air including dust and process emissions

Activities on site which have the potential to generate dust include milling, blending and sieving. Dust filters are employed to mitigate the impact of dust. Details of mitigation measures proposed are described in detail in Chapter 8 of the EIAR, which concludes that emissions to air from the proposed facility will not result in significant impacts on human health.

Waste gas emissions, including parameters, monitoring and proposed emission limits are described in 'Attachment 7.4.1 Emissions to Atmosphere Main and Fugitive'.

The Environmental Health Service recommends that existing air quality mitigation measures continue to be implemented as part of the revised licence

Conclusions

The Environmental Health Service makes the following recommendations in respect of the application for a licence review in respect of the OM² facility:

- All hard standing areas are visually checked on a monthly basis and any damage or cracks are repaired as they are identified
- Monitoring and sampling continues to be undertaken at these stormwater discharge points as a condition of the licence review.
- All groundwater monitoring wells are sampled biannually as a condition of the licence review and as proposed in the application
- Existing air quality mitigation measures continue to be implemented as part of the revised licence

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