

Submission

Submitter:	Miss Lisa Fitzpatrick
Organisation Name:	HSE
Submission Title:	Hse submission report SmartplyEHIS1864EPAP0001-05
Submission Reference No.:	S010093
Submission Received:	06 September 2021

Application

Applicant:	Smartply Europe Designated Activity Company
Reg. No.:	P0001-05

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.

Date: 3 September 2021

Our reference: 1864

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

EPA reference: P0001-05

Type of consultation: Industrial Emissions

Applicant: Smartply Europe Designated Activity Company, Belview, Slieverue, Co. Kilkenny

Location of Facility: Belview, Slieverue, Co. Kilkenny X91PX75

Nature of Facility: The production of one or more of the following wood-based panels: oriented strand board, particleboard or fibreboard with a production capacity exceeding 600m³ per day

Introduction

The following HSE departments were notified of the consultation request for this licence application on 16 July 2021

- Emergency Planning – David O’Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Helen Mulcahy
- CHO – Kate Killeen White

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

General

Smartply Europe Designated Activity Company, which is a wholly owned subsidiary of Coillte since May 2002, was originally granted a licence by the EPA in 1995 (P0001-01) for its facility in Belview, Slieverue, Co. Kilkenny. The facility is licenced under Class 8.7 and Class 2.1 of the First Schedule of the EPA Act, as amended, for the manufacture of oriented strand board.

Oriented strand board is manufactured by flaking logs into wafers or strands, where it is dried in rotary drum dryers, blended with resin/wax, formed in a line and then pressed back together under high pressure and temperature to form a board. The board is trimmed to size for two main categories – commodity grade and construction grade.

The Industrial Emissions Licence Application describes the activity as '*Class 8.7 The production of one or more of the following wood-based panels: oriented strand board, with a production capacity exceeding 600m³ per day and Class 2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more*'. There will be no change to the Class of Activity as a result of this licence review.

The Application Form states that the licence review relates to

- New/relocated emission point(s)
- Site related change (hours of operation, boundary, etc.)
- Other

SmartPly intends to install a new ca. 66 MW biomass energy plant and associated dryer. The company was granted planning permission on 12.9.19 (Planning ref 11/443) for buildings containing a blending plant, for example drying screens and associated equipment and the relocation of the energy plant. In March 2021 the company was granted planning permission (Planning ref 20/700) '*to develop a log yard and associated works to extend the area available for stockpiling and handling of logs for use in SmartPly's oriented strand board mill which adjoins the site*'

In the Reasons for Review' document submitted with the review application it states that '*as a result there will be*

- *Substantial changes at the site i.e. significant new plant;*
- *Changes in the licenced site boundary;*
- *One emission point will move (A2-3)*
- *Changes in minor emissions at the site*
- *Some changes in the Conditions and Schedules of the current IEL are required'*

The Non -Technical Summary states that SmartPly are currently authorised to use wood waste generated onsite as fuel but that as a result of the installation of the new energy plant, approximately 10% of annual fuel requirements (i.e. 10,000 tonnes) will be imported to the site.

The Industrial Emissions Licence review application is for emissions to surface water, storm water, noise 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 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 which are listed in Chapter 1.6 'Relevant BAT/BREF documents' of the Non -Technical Summary and included as attachments in the application.

Site location

SmartPly is located in Belview which is an industrial area surrounding Belview Port and is located approximately 6km north east of Waterford. It is on the northern bank of the River Suir which is the boundary between counties Waterford and Kilkenny. The area is sparsely populated with the closest residential property located approximately 50m from the SmartPly facility.

Surface water and Groundwater

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

The application states that there will be no changes to surface water emissions. There are no process emissions to ground or surface water onsite.

It is proposed to add pH as a parameter to be monitored as part of the licence review. Two new groundwater monitoring wells are proposed for the new log yard.

Attachment 7.2 'Emissions to Surface Water' indicates that there is one emission point for treated foul effluent from the site facilities such as toilets and canteen which is discharged to the estuary. No changes are proposed regarding the discharge to the Lower Suir Estuary with respect to ELVs, monitoring, abatement or control.

Monitoring of surface water and treated sewage effluent is undertaken on a monthly, quarterly and annual basis.

The site comprises production buildings, hardstanding areas, gravel which covers the majority of the site and some planted or grassed areas. An additional parcel of 13 acres of land acquired by SmartPly as part of the new log yard development will comprise 40,000m² of gravel. There will be an increase in volume of discharged stormwater due to an increase in the paved area of the site and the new log yard.

A drainage channel located at the perimeter of the site collects stormwater. The stormwater drainage system includes bar screens, an oil interceptor and two settlement ponds to mitigate impacts on water quality. Two new onsite storm drains are proposed to deal with the predicted increase in the volume of stormwater both of which will connect into the existing stormwater drainage at the site and the existing settlement tanks prior to discharge into the estuary.

It is noted in Table 3-1 'Lower Suir Estuary Monitoring Data at SR480 and SR490 (2016-2020)' that exceedences of the Surface Water Regulations have been noted for both MRP and Ammonia. Whilst

these exceedences are marginal and the HSE notes the reference to intensive agricultural practices in the environs of the River Suir it is recommended that sampling results for these parameters (MRP and Ammonia) are monitored closely to ensure any such exceedences are not linked to onsite production activities.

Emissions to air including odour and noise

Odour

Chapter 4.1 'Atmospheric Emissions' of the Non-Technical Summary accompanying the licence application states that there are 9 main emission points to air at the facility. It is expected that there will be some changes to minor and fugitive emissions as a result of the proposed changes to the facility.

Attachment 7.4.1 'Emissions to atmosphere' details the 'measures to reduce/minimise/prevent emissions' as 'Baghouse and Cyclofilters'. Emissions from the new dryer will be treated in one of the existing WESPs (Wet Electrostatic Precipitators)

No changes to odour emissions are anticipated. The licence application makes reference to two odour assessment reports undertaken since 2018. The reports indicate that the potential of odour nuisance arising from the settlement tanks and the package sewage plant is low and that none of the nearby receptors are predicted to experience odour nuisance issues as a result of activities undertaken at the SmartPly facility.

Potential minor emissions to atmosphere are contained in Attachment 7.4.2 and comprise VOCs and dust. For those requiring abatement a carbon filter system will be employed. The back-up diesel burner for the new biomass energy plant will be a source of minor emissions (NOx, SO2, CO particulates)

The Environmental Health Service is satisfied that the processes undertaken in the SmartPly 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

The application states that the extended log yard will bring the facility closer to the nearest receptors. The installation of the new energy plant will introduce a new noise emission from the site. The results of noise modelling has indicated that there will be no requirement to change the existing licence conditions associated with noise.

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

- Sampling results for MRP and Ammonia are monitored closely to ensure any exceedences are not linked to onsite production activities.
- All new equipment 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



Bernie O Halloran
Environmental Health Officer,
St Canice's Hospital,
Dublin Road,
Kilkenny



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

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

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



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

400611002
Environmental Health Department,
Top Floor,
St. Canice's Hospital,
Dublin Road,
Kilkenny.

Telephone (056) 7784016

Date: 03 September 2021

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

Re: Industrial Emissions Licence P0001-05

Applicant: SmartPly Europe Designated Activity Company, Belview, Slieverue,
Co. Kilkenny

EHIS ref: 1864

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 Ms Lisa Fitzpatrick, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

Lisa Fitzpatrick
Principal Environmental Health Officer

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