

Submission

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Organisation Name:	HSE
Submission Title:	HSE Submission P116901
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Application

Applicant:	Chemoran Limited
Reg. No.:	P1169-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte,
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Date: 16 February 2022

Our reference: 2111

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

Type of consultation: Industrial Emissions (I.E)

Applicant: Chemoran Limited

Location of Facility: Deerpark Industrial Estate, Oranmore, Galway H91D934

Nature of Facility: The production of organic chemicals, such as surface-active agents and surfactants (production means the production on an industrial scale by chemical or biological processing)

EPA reference: P1169-01

Introduction

The following HSE departments were notified of the consultation request for this licence application on 23 December 2021

- Emergency Planning – Kay Kennington
- Estates – Helen Maher/Stephen Murphy
- Assistant National Director for Health Protection – National Clinical Director for Health Protection
- CHO – Breda Crehan-Roche

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

General

The Chemoran facility is a manufacturer of amine emulsifiers which are used in the production of cationic bitumen emulsions for use in road surfacing. The plant is an operational facility within a larger site which is owned and operated by Colas Bitumen Emulsions (West) Ltd. (CBE (West))

The overall site is licenced by the EPA (Reg. No. P0056-01) and this licence application (P1169-01) relates to the Chemoran facility only and to the continuation of the activities currently undertaken at the facility. On the issuing of the licence (P0069-01) the existing Industrial Emissions licence held by CBE (West) Ltd will be amended 'to authorise and regulate those activities carried out at the CBE (West) facility only' (Chapter 1 Introduction EIAR).

Chemoran has operated at the Oranmore site since 1967.

The Chemoran plant operates between 8am and 5pm Monday to Friday. The production plant on site may operate between 4am and 8pm Monday to Friday during peak production, which may occur for up to 30 weeks per year depending on operational requirements (Chapter 3.4 'Hours of Operation' Non-Technical Summary)

Current and proposed emissions arising from the facility are emissions to air, noise and stormwater. Emissions to air are from two emission points (A1-1 and A1-2) serving the gas boiler which is located beside the production plant building.

The Non-Technical Summary accompanying the application details the legislative requirement for the licence application. In terms of the requirement for an Industrial Emissions licence, licencing requirements for this category of activity are contained in the First Schedule to the Environmental Protection Act 1992 as amended

- Class 5.9 – The chemical manufacturing of glues, bonding agents and adhesives, not included in paragraphs 5.12 to 5.17 and
- Class 5.12 (k) – The production of organic chemicals, such as surface-active agents and surfactants (production means the production on an industrial scale by chemical or biological processing)

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.

The Environmental Health Service office is not aware of any complaints regarding the existing Chemoran facility in the Deerpark Industrial Estate.

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

- Any potential contamination of 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 a review of the licenced facility.

Site location

Chemoran Ltd. is located in the Deerpark Industrial Estate which is in the townland of Carrowmoneash approximately 1km north of Oranmore town centre and 8km east of Galway City. The site is surrounded to the north and west by agricultural land and one -off rural housing. The M6 Galway to Dublin Motorway runs west to east c. 1.6km north of the 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 EIAR states that there is no process effluent discharged from the Chemoran facility and that domestic effluent from the welfare facilities at the site office is discharged into the public sewer system via the site foul drainage network.

Wastewater from the production process is transferred into Intermediate Bulk Containers (IBCs) and stored in a bunded area prior to collection and removal off-site by an authorised waste contractor.

The Environmental Health Service notes the proposal to provide a new monitoring point upstream of the holding tank to monitor the quality of stormwater discharged from the facility.

It is proposed that stormwater emissions which are to a local stream (Carrowmoneash stream) are continuously monitored for pH and total organic carbon.

The Environmental Health Service is satisfied that if

- the mitigation measures included in Chapter 8-5 of the EIAR are implemented in full and
- that existing groundwater quality is not further compromised by fugitive emissions from the Chemoran facility- the potential risk to public health should be minimal

Emissions to air including odour and noise

The Chemoran facility has two licenced emissions to air points. Emission points are identified as A1-1 and A1-2 and are associated with the two on-site oil fired boilers. Chapter 10.4.3.1 'Air Quality' of the EIAR states that *'boiler related air emissions may generate quantities of air pollutants such as NO₂ and SO₂'* which were included in air dispersion modelling. The modelling concludes that *'the impact to human health is considered long-term, negative and imperceptible'* and no mitigation measures are proposed during the operational phase

Noise

It is noted in Chapter 9.2.2.1 'Noise Criteria: EPA – NG4' that the facility *'operates between 08:00 hrs and 17:00 hrs Monday to Friday under normal conditions' and for approximately 30 weeks of the year, the facility commences operation at 04:00 hrs up until 20:00 hrs'* and that noise monitoring data was collected from a total of nine locations as part of the preparation of the EIAR.

Noise monitoring was undertaken between the hours of 8:51am to 15:20am on 24 August 2021 and the hours of 10:40am to 17:17pm on 20 October 2021.

The EHS was unable to locate monitoring data for the period 4am to 7am when the night time noise criteria applies and recommends night time monitoring is included in future noise monitoring of the Chemoran facility.

Chapter 9.4.3.1 'Operational On-Site Noise Levels' states that *'activities within the production building do not generate any notable noise emissions external to the building'* and that *'the main source of noise is associated with the chemical cooling system located to the south of the production building'*.

No noise mitigation measures are proposed as the predicted impact of noise from the Chemoran facility on noise sensitive receptors is negligible.

Conclusions

The Environmental Health Service makes the following recommendation in respect of this application-

- That monitoring data for the period 4am to 7am when the night time noise criteria applies is included in future noise monitoring of the Chemoran facility.

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