

Submission

Submitter:	Miss Niamh Flanagan
Organisation Name:	HSE
Submission Title:	HSE Consultation
Submission Reference No.:	S010303
Submission Received:	03 May 2022

Application

Applicant:	Britvic Ireland Ltd.
Reg. No.:	P1178-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health
Officers Department
4TH Floor Chamber House,
Chamber Square, Tallaght, Dublin 24
Eircode: D24 VRC0

T: 01-4686375

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

26th April 2022

**Re: Industrial Emissions Licence P1178-01
Britvic Ireland Ltd**


Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the scoping of the above proposal. The following HSE departments were notified of the consultation request for this development on 31st March 2022.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- National Clinical Director for Health Protection
- CHO – Ann O'Shea

This report only comments on Environmental Health impacts of the scoping request. If you have any queries regarding this report the contact is Declan Roe, Principal Environmental Health Officer at Declan.roe@hse.ie

Yours sincerely,



pp
Principal Environmental Health Officer



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Officers
Department
4TH Floor Chamber House,
Chamber Square, Tallaght, Dublin 24
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HSE EIAR SUBMISSION REPORT
Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000,
& Regs made thereunder).

Date: **26th April 2022**

EHIS Reference: **2305**

Type of consultation: **IE Licence**

EPA Reference No: **P1178-01**

Applicant: **Britvic Ireland Limited**

Nature of Activity: **7.8 (a) (ii) – The treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from: only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year;**

Introduction

This report only comments on Environmental Health impacts of the licence review application. 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 and ground water
- Emissions to air including noise and process emissions

An Environmental Impact Assessment was not carried out to support the licence application.

Description

The Britvic facility currently operates 6 production lines which consist of one returnable glass line, three PET lines, a can line and a bulk juice line and a bulk powder packaging line. It is unclear if production is to be increased as a result of the volume increase at the site.

The applicant states the reason for the licence review is *“that due to extra volume being put through the site due to the recent investment programme in our UK sites, our volume has increased above the specified threshold”*.

I could not find specific details of this volume increase in the documents submitted by the applicant and I am unclear of the impact on production processes on the ground. I could not locate an assessment of the potential impact of any corresponding increase in emissions due to the extra volume being put through the site.

Site Location

Britvic Soft Drinks Ltd operates a soft drinks manufacturing facility in Kylemore Park West, Ballyfermot, Dublin 10. Kylemore Park is an industrial area with mainly light engineering, retailers & food businesses including service sector, wholesaling & manufacturing. The area surrounding the site comprises a development of industrial units including manufacturing & retail. Directly adjacent to the site is Thornton's Recycling Plant whilst Henkle Ireland-Adhesives Manufacturer is located approx. 150m north of site.

Approximately 400m to the south of the site the Grand Canal passes from East to West. Approx 500m south-east & 1300m to the north of the site lie the River Camac & the River Liffey respectively.

There are no sensitive receptors within inner catchment area of Kylemore Park.

Air Emissions

There are two sources of air emissions at the Britvic Ireland site. Element Ireland were commissioned to carry out stack emissions testing on Boilers No.1 & No.2 at the site in

August 2020. The aim was to monitoring for a number of prescribed pollutants including Total Particulate Matter, Sulphur Dioxide, Oxides of Nitrogen (as NO₂) and Carbon Monoxide. The results were included in the stack emissions testing report.

It is recommended that routine monitoring of emissions & boiler combustion efficiency should be undertaken at the site in line with EPA guidance.

Noise

Results of an environmental noise survey carried out at the Britvic Ireland site by Exova (UK) Ltd were provided in the applicants documents. The survey was carried out on 8th & 9th May 2018. I could not locate up-to-date noise monitoring results from the site.

The Britvic site in Dublin operates 24 hours per day.

The results of the noise survey indicate that the noise levels measured around the boundary locations of the site during daytime and evening periods were predominantly the result of extraneous noise (local road traffic noise) not attributable to the Britvic site.

The applicant has not assessed the impact of any potential increase in noise from the site as a result of the volume increase at the site.

Ground Water

Britvic Ireland utilise the groundwater body beneath the site as a resource in the manufacture of soft drinks. The obtained a Spring Water Abstraction licence from the Food Safety Authority of Ireland and this water is routinely monitored for an extensive suite of parameters. The most recent groundwater monitoring report which was completed in January 2019 is attached as Appendix D.

A risk management protocol for this water supply was prepared by Golder Associates, to manage potential risks to their production well from neighbouring activities. (Report included in Appendix C of the Site Condition Report).

Britvic has recently commissioned an ozone treatment plant to remove naturally occurring dissolved manganese in groundwater beneath the site.

Procedures for the storage, control and handling of chemicals at the Britvic site are also outlined. The use of bunding, double skinned storage vessels and level alarms on tanks are implemented on site. Britvic has also implemented a routine bund inspection and testing programme .

Climate

It is stated by the applicant that energy ratios are set as Key Performance Indicators and are monitored routinely. Britvic Ireland also ensures energy audits are carried out in line with the SEAI requirements. It is also stated the company is signed up to science-based targets in line with government initiatives.

Wastewater

The facility has obtained a Discharge Licence from Irish Water to discharge trade effluent from the Britvic site to the sewer.

Continuous monitoring of waste water flow, pH and temperature is carried out at key locations such as;

- at the inlet and/or outlet of the pretreatment,
- at the inlet to the final treatment,
- at the point where the emission leaves the installation

The facility also undertakes water audits via external third-party consultants with the aim to reduce water consumption and the volume of waste water discharged.

Waste

It is stated that the manufacture of soft drink beverages at the Britvic plant does not give rise to significant quantities of hazardous waste. Named waste contractors collect and dispose of waste from the plant. Disposal certificates are issued by the waste contractor and maintained on site.

There are small quantities of hazardous wastes generated on site annually, items such as fluorescent tubes, batteries, oils, etc. These wastes are stored and managed in hard standing contained areas with no pathway to soils and groundwater. All waste oil is stored in a double skinned tank on site.

Conclusions:

The applicant had provided vague information regarding the reasons for the licence review and the increase in volume handled at the Britvic Ireland site.

It is stated *"that due to extra volume being put through the site due to the recent investment programme in our UK sites, our volume has increased above the specified threshold"*.

1. It is the opinion of the EHS that the applicant should provide specific details regarding the nature and extent of the 'volume increase' and clarify if this will result in increased emissions from the site.
2. The impact of any resulting increase in emissions should be assessed by the applicant as part of the licence review.

Lisa Maguire

Lisa Maguire
Environmental Health Officer

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