



Submission

Submitter:	Miss Margaret Byrne
Organisation Name:	HSE Environmental Health
Submission Title:	Environmental Health Submission
Submission Reference No.:	S010992
Submission Received:	14 March 2023

Application

Applicant:	Arrow Group Limited
Reg. No.:	P0812-02

See below for Submission details.

Attachments are displayed on the following page(s).



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Health Service Executive

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Environmental Licencing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co Wexford

8 March 2023

Reference Number: P0812-02

Re: Industrial Emission Licence Review Application - Arrow Group Ltd, Maudlin Industrial Estate, Naas, Co Kildare

Dear Sir/Madam,

The HSE Environmental Health Consultation report regarding the above application is attached below. The following HSE departments were made aware of the consultation request for the proposed development on 24 January 2023.

- HSE Estates
- Emergency Planning – Brendan Lawlor
- Director of National Health Protection – Eamonn O'Moore
- Mary O'Kelly, CHO

The Environmental Health Service response to the application is in the attached consultation report. If you have any queries regarding the report, please contact me.

Yours Sincerely,

A handwritten signature in cursive script, reading 'Margaret Byrne'.

(pp) Derek Bauer
Principal Environmental Health Officer

8 March 2023

EHIS Reference No. 2995

HSE EIS SUBMISSION REPORT
Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000,
& Regs made thereunder).

Report to: Environmental Protection Agency
Type of consultation: Industrial Emissions Licence
Reference Number: P0812-02

Applicant: Arrow Group Ltd, Maudlin Industrial Estate, Naas, Co Kildare
Proposal: Industrial Emission Licence Review Application

Introduction

This report only comments on Environmental Health impacts of the Industrial Emission Licence Review Application and reports submitted by the applicant on the EPA website. The Environmental Health Service (EHS) has made observations and submissions on the following specific environmental health areas.

The facility is located in an industrial estate just off the M7 motorway close to Naas town. There are several sensitive receptors close to the facility with a number of residential housing estates in close proximity and a nursing home within 500m of the site. The local environmental health officer has reported that there were no complaints received over the past 5 years regarding this facility. It is important to note that a member of the public making a complaint to the local EH office regarding a facility with an IE Licence would be advised to contact the EPA.

1. Non-Technical Summary

A non-technical summary could not be found in the application documents. The documents which were submitted are very technical in nature and the general public may find them difficult to understand. A non-technical summary is a concise document that would provide a description of the licence review process and outline the environmental impacts in a non-technical manner.

The EHS recommends that the applicant is requested to submit a non-technical summary or similar document to inform local residents and the wider community of the licence review and the environmental impacts associated with it.

2. Noise

Condition 4.5 of the current licence, P0812-01 requires that “Noise from the installation shall not give rise to sound pressure levels (Leq, T) measured at the boundary of the installation which exceed limit values as follows:

B.4. Noise Emissions

Daytime dB(A) $L_{Aeq}(30 \text{ minutes})$	Night-time dB(A) $L_{Aeq}(30 \text{ minutes})$
55 ^{Note 1}	45 ^{Note 1}

Note 1: There shall be no clearly audible tonal component or impulsive component in the noise emission from the activity at the boundary to the installation.

The licence requires the applicant to carry out a noise survey of the site operations annually using methodology outlined in the EPA’s ‘Environmental Noise Survey Guidance Document’. The noise

monitoring results from June 2021 are provided as part of this application (see an example of results below). The levels are presented as Ambient L_{A90} , Residual L_{A90} and Specific Plant L_{Ar} , the 'limit' has no reference value.

Date	Location	Survey Position	Ambient $L_{A90,T}$	Residual $L_{A90,T}$	Specific Plant $L_{Ar,T}$	Limit
30/05/2019	NSL2	NSL01a	49 - 50	NA	49 - 50	45
06/06/2019	NSL2	NSL01b	48 - 49	NA	48 - 49	45
06/07/2020	B2	N01 - closer to B02	40 - 46	38	36 - 45	45
10/02/2021	NSL2	NSL2 Naas Oil Yard	46	41	44	45
10/02/2021	B2	B2 Aylmer Park	50	43	49	45
10/02/2021	B2	NSL3 Aylmer Park	42	36	41	45
25/06/2021	B2	B2 Naas Oil Yard	44	40	41	45

The limit values specified in the current licence are L_{AEQ} limit values at the site boundary. It was not possible to establish compliance with boundary noise limit values using the information presented in the applicant's documents.

The Annual Environmental Report 2021 which is available on the EPA's website was examined and it stated that 471 noise complaints were received during that year. The volume of complaints noted in the Annual Environmental Report during 2021 is of concern. The World Health Organisation has established that noise is an important public health issue and it can have negative impacts on human health and well-being and is a growing concern¹.

It is of utmost importance that the applicant can demonstrate compliance with the current limit values to ensure the protection of public health and to prevent a nuisance arising. If compliance cannot be demonstrated the applicant should be requested to submit mitigation measures to reduce noise levels to the required limits.

The applicant has submitted a 'Mechanical Plant Noise Model Update' which was prepared by AWN Consulting in July 2022. This report states that an extensive noise survey was completed across the site and this information was used to update the site noise model and identify key contributory noise sources which contribute to noise levels at the boundary. An exceedance of predicted noise levels at monitoring location B02 is noted but the report argues that perhaps this location is not a suitable noise monitoring location. The report has outlined a number of mitigation measures to reduce noise levels at this location. Noise monitoring should be carried out at this location to ensure that mitigation measures were effective in reducing noise to an acceptable level at the site boundary.

Noise monitoring results specifying L_{AEQ} noise levels at each boundary location/noise sensitive location for day, evening and night-time monitoring should be submitted in order to demonstrate compliance with current noise limit values. The applicant should also advise if any noise complaints were received in 2022.

3. Odour

The applicant provided a report on odour abatement systems, odour monitoring results and outlined the odour abatement measures which have been installed at each Atmospheric Emission Point throughout the facility.

¹ Environmental Noise Guidelines for the European Region, World Health Organisation, 2018

The current licence requires the applicant to comply with the following condition:

- 5.2 No emissions, including odours, from the activities carried on at the site shall result in an impairment of, or an interference with amenities or the environment beyond the installation boundary or any other legitimate uses of the environment beyond the installation boundary.**

The Annual Environmental Report 2021 advises that 118 odour complaints were received during that year, the report states that all complaints were closed out. A summary of odour assessments is copied from the report below.

Table 10 Summary of Odour Assessments Carried Out

Assessment Conducted By	No. of Odour Assessments	% Compliant ⁸	Comment
Licence Holder	244	100	3% improvement Vs. 2020
EPA	23	57%	22% improvement Vs. 2020

The applicant has stated that they are achieving a 100% compliance rate during assessments in comparison to the EPA's 57% compliance rate. It would appear that the applicant's 100% compliance rate is incongruent with the number of odours complaints which were received in 2021.

The odour monitoring results from 2019 to May 2022 have been provided in a tabular format. The applicant has provided details of odour monitoring at each of the inlets and exhausts and the effectiveness in terms of a percentage of odour removal. There is a large variation in the results provided e.g Emission point A2-4 results range from 191 OuE/m³ to 1368 OuE/m³ over the 3 year period. The applicant has not provided any context or further explanation of the monitoring results or how the odour emissions may be dispersed in the local environment.

The applicant must demonstrate that the facility does not cause odour nuisance in the local area to ensure the protection of public health. The applicant should be requested to submit further details regarding odour monitoring at sensitive locations beyond the site boundary.

The Applicant should consider how odour monitoring results compare to the EPA's Odour Emissions Guidance Note (AG9) and in particular, the indicative Odour standards outlined in Table 3.1 of that Guidance set out below.

Table 3.1 Indicative Odour Standards Based On Offensiveness Of Odour Taken From (EA, 2011) And Adapted For Irish EPA Use

Industrial Sectors	Relative Offensiveness of Odour	Indicative Criterion ^{Note 1}
<ul style="list-style-type: none"> Processes involving decaying animal or fish remains. Processes involving septic effluent or sludge Waste sites including landfills, waste transfer stations and non-green waste composting facilities. 	Most Offensive	1.5 OU _e /m ³ as a 98 th ile of hourly averages at the worst-case sensitive receptor
<ul style="list-style-type: none"> Intensive Livestock Rearing Fat Frying / Meat Cooking (Food Processing) Animal Feed Sugar Beet Processing Well aerated green waste composting <p>Most odours from regulated processes fall into this category i.e. any industrial sector which does not obviously fall within the "most offensive" or "less offensive" categories.</p>	Moderately Offensive	3.0 OU _e /m ³ as a 98 th ile of hourly averages at the worst-case sensitive receptor
<ul style="list-style-type: none"> Brewery / Grain / Oats Production Coffee Roasting Bakery Confectionery 	Less Offensive	6.0 OU _e /m ³ as a 98 th ile of hourly averages at the worst-case sensitive receptor

^{Note 1} Professional judgement should be applied in the determination of where the worst-case sensitive receptor is located.

4. Assessment of Air emissions

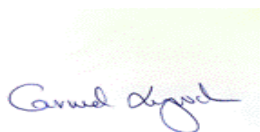
The applicant submitted an air dispersion modelling report by Awn Consulting Ltd. as part of this application. This report outlined details of air emissions from the facility i.e. Nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and particulates (PM10 and PM2.5) and modelling was carried out to determine if ambient concentrations were in compliance with Air Quality Standards. The report did not detail any odour related emissions.

The applicant described the main emission points on site as boiler emission points. NO₂ and SO₂ emissions from the facility are predicted to be in compliance with relevant Air Quality Standards when the facility is operating on either natural gas or oil at the worst case off site location. Similarly, the report advises that PM10 and PM2.5 emissions are in compliance with relevant limit values at the worst case location off site.

The report concludes that these air emissions will not have a significant impact on the local environment. The EHS is satisfied that the facility is in compliance with relevant air quality standards which will protect public health.

Conclusions

1. The EHS recommends that the applicant is requested to submit a non-technical summary or similar document to inform local residents and the wider community of the licence review and the environmental impacts associated with it.
2. Noise monitoring results specifying L_{Aeq} noise levels at each boundary location/noise sensitive location for day, evening and night-time monitoring should be submitted in order to demonstrate compliance with current noise limit values. The applicant should also advise if any noise complaints were received in 2022.
3. The applicant must demonstrate that the facility does not cause odour nuisance in the local area to ensure the protection of public health. The applicant should be requested to submit further details regarding odour monitoring at sensitive locations beyond the site boundary. The Applicant should consider how odour monitoring results compare to the EPA's Odour Emissions Guidance Note (AG9)



Carmel Lynch
Environmental Health Officer
Environment and Climate Change Network Support Unit