Submission	
Submitter:	Mrs arlene ward
Organisation Name:	HSE
Submission Title:	Waste Management Industrial Emissions
Submission Reference No.:	S011092
Submission Received:	20 April 2023
Application	
Applicant:	Starrus Eco Holdings Limited
Reg. No.:	W0136-04

See below for Submission details.

Attachments are displayed on the following page(s).

An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

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Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 18th April 2023

Type of consultation: Waste Management Industrial Emissions

EHIS Reference: 3046

Dear Sir/Madam

Please find enclosed the HSE consultation Report in relation to the above proposal. The following HSE departments were made aware of the consultation request for the proposed development on the 17th February 2023

- HSE South Emergency Management – David O'Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Michael Fitzgerald

If you have any queries regarding this report please contact, the Environment/ Climate Change, Network Support Unit.

Yours Sincerely

Arlene Ward.

Arlene Ward
Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

Environmental Health Service Consultation Report

(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended)& Regulations made thereunder)

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 06.04.2023

Type of consultation: Industrial Emissions

Planning Authority: Cork City Council

EPA Reference Number: W0136-04

EHIS Reference number: 3046

Applicant: Starrus Eco Holdings Limited, Panda Waste Management Solutions, Ballymount Road Upper, Dublin 24, Dublin

Location of development: Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Cork, T45 R585

General Comments:

Details of the application were circulated to HSE stakeholders on the 17th February 2023.

- HSE South Emergency Management – David O'Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Michael Fitzgerald

This report only comments on Environmental Health impacts of the license 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

General

Starrus Eco Holdings Ltd (SEHL) operates its waste management facility in Sarsfieldcourt Industrial Estate at Glanmire under an Industrial Emissions Licence(W0136-03) granted by the Environmental Protection Agency (EPA). It is proposed to extend SEHL's EPA licence boundary to incorporate an adjoining waste management facility operated by Starrus Property Holdings Ltd (SPHL) that operates under a Waste Permit(WFP-CC-38-2020) issued by Cork City Council.

SEHL and SPHL are part of the Beauparc Group, Ireland's leading integrated waste management company. SEHL and SPHL have not been convicted for breaches of the Waste Management Act, the EPA Act, the Water Pollution Act and the Air Pollution Act. SEHL and SPHL have never had insolvency or bankruptcy proceeding against them or suspended their business activities. SEHL is in a financial position to meet all the financial commitments and liabilities that will be incurred by the activities.

Whilst assessing this licence application review and the nature of the activities that occur on site the Environmental Health service would recommend the **EPA's BAT Guidance Note for the Waste Sector: Waster Transfer and Material Recovery"**

A local Environmental Health Officer visited the location of the proposed development on 28th February 2023 to assist with the preparation of this report. This report only comments on Environmental Health impacts of the proposed development from the viewpoint of the Environmental Health Service (EHS).

The Environmental Health Service has made observations and submissions on the following specific Environmental Health areas:

Site Location

The site is located in Sarsfieldcourt Industrial Estate is approximately 5km north of Glanmire Village. The Industrial Estate is in a rural area where the surrounding land use is primarily agricultural, with some low density residences. The nearest sensitive location (private residence) is a house at Buck Leary's Cross Roads, approximately 170m to the north-west of the site. The site covers 22,921m2and is made up of two operational areas.

The northern area occupies 15,600m2. The entrance is off an internal access road within the Industrial Estate and there is one main waste processing handling building, office, weighbridges, an odour control unit, vehicle wash, bin wash, wheel wash, non-conforming waste and fire quarantine areas, paved open yards, civic amenity area, parking spaces with a landscaped area and a firewater storage tank.

The civic amenity area has its own dedicated entrance for members of the public. There are a number of dedicated closed skips for mixed municipal waste, dry recyclables (cardboard, plastics, metals, papers) and waste electrical and electronic equipment. The southern area covers 7,800m2and contains a recycling building, a site office, a fire water storage tank, generator, weighbridge and paved storage yards.

Assessment of Public Consultation & Non-Technical Summary:

The Non-Technical Summary which accompanies the Planning Application provides a concise summary of the EIA process, the construction and operation of the proposed development and its potential impacts on human health.

There is no reference that public consultation has taken place in relation to this application.

Assessment of Description of Physical Environment:

A good description of the physical environment is provided in the application documentation.

Geology / Soils

The site is almost entirely covered by buildings and concrete paving. The subsoils in the locality are Sandstone till (Devonian). The underlying bedrock is Devonian mudstone and siltstone from the Ballytrasna Formation. There are no direct or indirect emissions to ground and the extension of the licence boundary will not give rise to any new discharges. The current prevention and mitigation measures include inspection and repair as required of the paved areas; the adoption of an emergency response procedure, and staff training on appropriate spill response actions.

Air

The EPA ambient air quality databases indicate the air quality in the vicinity of the site is good. The potential impacts on air quality associated with the operations include odours, particulates (dust) and exhaust gases from vehicles. The extension of the licence boundary will not give rise to any new emissions from waste processing and will not result in any additional vehicle movements and an associated increase in exhaust gases. The mitigation measures currently applied include handling the waste inside the buildings; regular inspection and cleaning of waste handling areas and the provision of an odour control system (extraction of odorous air from the building where the residual mixed waste are processed and its treatment in a carbon filter). The waste transport vehicles are fitted with catalytic converters.

Odour – With the exception of the stack on the odour control system in the Main Processing Building, there are no fixed point emission sources. Potential fugitive emissions include dust, vehicle exhausts and odours.

Long term emissions from development with potential to adversely impact on air quality on their own and cumulatively include dust and vehicle exhaust gases. The only source of dust emissions are waste processing inside the building and vehicle movements on the yards during dry weather. The transport vehicles should not travel across any unpaved areas and the wheels do not have any debris that can be a source of dust in dry weather.

The primary generators of traffic in the construction stage will be contractor staff and the delivery of construction materials.

The CEMP must address air within this application provides measures for good practice during the construction phase and should be adhered to in full.

Examples of good practice during this phase are:

- Water spraying of exposed earthworks and site haul road during dry weather using mobile bowser units
- Provision of a power washing at the site access road to remove dirt from vehicles prior to exiting the site
- Control of vehicle speeds, and
- Material drop heights from plant to plant or from plant to stockpile will be minimised.

In the operational phase this facility should monitor emissions in accordance with the waste facility permit and licence.

Water /Hydrology/hydrogeology;

The facility is in the catchment of the Glashaboy River, which is approximately 2 km to the south west of the site boundary. An unnamed tributary of the Glashaboy River is approximately 100 m to the east of the site boundary and receives run-off from the facility and other occupants of the Industrial Estate. The bedrock beneath the site is classified as a Locally Important Aquifer (LI), being Moderately Productive only in Local Zones. The aquifer vulnerability to pollution from sources at the ground surface is High. The site is almost entirely covered with buildings and paving, which effectively prevents groundwater recharge. The direction of groundwater flow is expected to be to the south, towards the Glashaboy River. It has been outlined that the sanitary wastewater and rainwater run-off from areas where wastes are stored and wash water from the vehicle/bin wash go to two holding tanks (one for sanitary and one for process related runoff) which are located to the east of the weighbridge. The wheel wash adjacent to the weighbridge has a self-contained tank. The tanks are emptied as required and the contents sent to off-site authorised wastewater treatment plants. The extension of the licence boundary will not result in any change to the emission to surface water and will not give rise to any new direct or indirect emissions to groundwater. The current prevention and mitigation measures include the provision of impermeable paving across the operational areas; inspection and repair as required of the paved areas; the provision and maintenance and integrity assessment of spill containment for the above ground oil and wastewater storage tanks; the routine inspection and survey of the surface water and foul water drainage systems; the adoption of an emergency response procedure, and staff training on appropriate spill response actions.

Noise and Vibration

The waste processing is a source of continuous noise emissions. Waste transport vehicles, staff private cars and the mobile plant are sources of intermittent emissions occurring during

the waste acceptance and processing hours. Noise surveys are carried out annual at the monitoring points specified in the licence.The nearest sensitive location (private residence) is at Buck Leary's Cross Roads, approximately 170m to the north-west of the installation boundary. The sources of noise emissions are the staff vehicles, waste transport vehicles and the waste processing and handling equipment.

The mitigation measures are the internal processing of waste and keeping building doors closed. The facility is also surrounded by 2.5m high blockwork walls that provide further mitigation. Current operations are not a source of noise nuisance at off-site noise sensitive locations. The proposed extension of the licence boundary will not require the provision of any new plant and equipment and will not result in any new or additional noise emission sources.

The Environmental Health Department requests that the CEMP plan should include and recommends that these measures should be included as conditions of planning permission, if granted.

Noise conditions as per Waste facility permits and EPA licences will need to be met. The EPA guidance note for noise: 'Licence applications, surveys and assessments in relation to scheduled activities' must be adhered. This document recommend noise limits of **55dB(A) Lar,T for daytime and 45Db(A) LAeq,T** for night time at sensitive locations which include private residence's.

In relation to noise the measures will include, but are not limited to:

- Monitoring is also undertaken outside of 'daytime' hours.
- Noise monitoring will continue to be undertaken around the application site. Noise monitoring locations will be reviewed and revised where and as/when necessary.
- Corrective action should be included in the Environmental Management Plan if exceedances of permitted limits are recorded
- Selection of quiet plant/location of plant; plant which will have the least impact in term of noise will be selected and will be positioned as far away as practical from noise sensitive receptors i.e. private residences.
- Plant will only be left running during works and will be switched off at all other times. Plant will not be left idling. No maintenance or repair to plant or machinery will be permitted outside of the permitted construction works hours.
- Hours of work - all construction related works, other than emergency works and security will be carried out during normal construction working hours

Construction

Construction of the proposed development will involve the use of plant machinery and storage of materials such as oils, fuels and chemicals. There is potential for accidental spillage or release of fuel, oil and other dangerous substances which could be washed into receiving waterbodies of the stream located at the northwest corner of the site.

In addition to the CEMP plan the following measures should be carried out:

• Excavation and the stripping soil/made ground should not be undertaken until absolutely necessary to prevent sediment run off and leaching of nutrients from soils into drains.
• If groundwater is encountered during excavations then mechanical pumps will be required to remove the groundwater from sumps. Sumps should be carefully located and constructed to ensure that groundwater is efficiently removed from excavations and trenches

Operational Stage:

There should be no direct or indirect discharge of sanitary and process wastewater to the surface water drainage system. All materials reception, processing and storage will be carried out inside the processing building. All storage and process tanks in the washing plant should be above ground. Fuel oil (diesel) will not be stored or used at the facility and lubricating and hydraulic oils used in plant maintenance will be stored in bunded pallets inside the building.

Waste

Section 29(2A) of the Waste Management Act 1996, as amended states that it shall be the duty of waste producers and holders to ensure that waste undergoes recovery operations in accordance with sections 21A and 32(1) of the Acts. For waste whose generation cannot be prevented, describe what measures will be in place to ensure that waste is collected separately (if technically, environmentally and economically practicable) and will not be mixed with other waste or other material with different properties. The Environmental Health Department welcomes that the current operations are consistent with the national policy objectives and contribute to the achievement and maintenance of national and regional recycling and recovery targets whilst encouraging circular economy initiatives.

Pest Control

The applicant has implemented mitigation measures to control vermin and pests on the site.

Conclusions

The Waste Facility Permit/Waste Licence will specify the monitoring requirements in the operational stage, which may include:

- **Surface water quality**
- **Groundwater quality**
- **Emissions to air,**
- **Noise**

- Detailed construction noise mitigation measures should be implemented in full to minimise any risk to public health from noise during the construction phase of the proposed development. As no noise monitoring currently takes place it may be of consideration to reinstall monitoring during the construction phase.

In relation to noise the measures will include, but are not limited to:

- Monitoring is also undertaken outside of 'daytime' hours.
- Noise monitoring will continue to be undertaken around the application site. Noise monitoring locations will be reviewed and revised where and as/when necessary.
- Corrective action should be included in the Environmental Management Plan if exceedances of permitted limits are recorded
- Selection of quiet plant/location of plant; plant which will have the least impact in term of noise will be selected and will be positioned as far away as practical from noise sensitive receptors i.e. private residences.
- Plant will only be left running during works and will be switched off at all other times. Plant will not be left idling. No maintenance or repair to plant or machinery will be permitted outside of the permitted construction works hours
- The Environmental Health Service recommends that Operators must comply with best practice, legislation and guidelines current at that time so that effects are not significant for local residents.
- The EHS recommends that all noise mitigation measures, including monitoring and corrective actions are included as conditions if granted. This measure is for the protection of public health
- The condition of the access roads to the site is monitored and that any defects identified e.g. potholes or surface cracking are repaired within 24 hours. This is in order to minimise the generation of dust and noise from vehicles and is a health protection measure.
- All mitigation measures identified to protect surface and ground water should be implemented in full.
- In order to ensure dilution and dispersal of treated effluent the receiving river water should have a consistently adequate assimilative capacity. A condition should be included in the license to require the implementation of an emergency plan should water levels drop to an extent which may impact on dispersal and dilution of treated effluent discharge. Regular monitoring of water levels and flow within the upstream of the plant should be undertaken to ensure the assimilative capacity of the receiving water body is maintained.
- That a complaints procedure is implemented and that a member of staff is designated as a point of contact to deal with any complaints or queries received from members of the public in relation to the proposed activity.
- That an Odour Management Plan is implemented and that regular unannounced odour audits of the plant are undertaken.
- It is recommended that the routine monitoring, maintenance and repair of all plant, equipment and pipework is included as a condition of the licence.

- Desludging will be required, however this is not expected for at least 5-10 years. Sediment build up in the wetland will include metals accumulated. Sediment will be removed from the ponds as required when the pool volume has become reduced significantly or the ponds have become eutrophic. A desludging procedure will need to be implemented for the settlement ponds.
- It is essential that the mitigation in the form of the leachate management system operation and maintenance and the monitoring of the effluent quality and receiving environment are continued to ensure that the system continues to achieve the necessary ELVs as let in the license in order to protect public health.
- A system should be put in place for dealing with enquiries and/or complaints from members of the public during the operational phase of the facility.
- Water monitoring results should be reviewed and where there is indication of contamination or significant dewatering of drinking water supplies additional mitigation should be agreed with the Planning Authority. The effectiveness of the additional mitigation should be verified through a sampling programme. Any wells identified as a drinking water supply and located within 150m of the facility are sampled prior to the commencement of extension works. Sampling parameters should be agreed with the Local Authority. These wells should also be sampled at least biannually during the operational period.
- Mitigation measures proposed for the protection of surface and groundwater are implemented in full and are monitored on an on-going basis (as part of an Environmental Management Plan) in order to mitigate any potentially significant effects.
- Dust mitigation measures outlined above are included as conditions of planning permission (if granted); are implemented in full and are monitored to ensure the effectiveness of the mitigation.

Arlene Ward.

Arlene Ward
Environmental Health Officer

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Environment/ Climate Change Network Support Unit at Env.CCNSU@hse.ie**