



Submission

Submitter:	Mrs Aoife Gardiner
Organisation Name:	HSE
Submission Title:	Environmental Health Service Consultation Report
Submission Reference No.:	S011532
Submission Received:	02 April 2024

Application

Applicant:	Donegal County Council
Reg. No.:	W0062-03

See below for Submission details.

Attachments are displayed on the following page(s).



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
Johnstown Castle Estate
Co. Wexford

Date: 02/04/2024

Type of consultation: Waste License

Planning Authority: Donegal Co. Council

EPA Reference Number: W0062-03

EHIS Reference number: 3764

Applicant: Donegal County Council, County House, Lifford, Donegal.

Location of development: Churchtown, Lifford, Donegal, A00 AA00 , National Grid Reference N395986 E230985

General Comments:

Details of the application were circulated to HSE stakeholders on 29th of February 2024.

- HSE Emergency Planning
- HSE Estates
- HSE Health Protection
- Mr Dermot Monaghan HSE Donegal

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

Proposed Development:

<u>Classes and Nature of Activity in accordance with the Waste Management Act 1996 as amended</u>		
Class of Activity	Principal Activity	Class of Activity Description
D04	Yes	Surface impoundment (e.g. placement of liquid or sludgy discards into pits, ponds or lagoons, etc.)
D15	No	Storage pending any of the operations numbered D 1 to D 14 (excluding temporary storage (being preliminary storage according to the definition of 'collection' in section 5(1)), pending collection, on the site where the waste is produced).
D01	No	Deposit into or on to land (e.g. landfill, etc.)

Catherine Deeney Environmental Health Officer visited the location on the 6th of March 2023 of the proposed development 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:

Assessment of principle and description of the project

The Environmental Health Service (EHS) is satisfied that the information provides an adequate description of the proposed project.

Previous History

- Section 42(1)(b)
- Article 8 7 March 2019 1 April 2019
- Article 14(2)(b)(ii) 17 July 2019, 19 March 2019, 17 July 2019



Date of notification of proposed determination 22 October 2020 Manner of proposed decision on application or review to grant a license with conditions.

Post issuing Waste Licence Description of Notice Section/ Article Date notice issued by Agency Date reply received by Agency Monitoring Frequency/Periods Time for the Activity to Commence Section 49(2)(a) Application to Extend Time for Activity to Commence Section 49(2)(b) Agency Decision re: Extending Time for Activity to Commence Section 49(2)(b) Notice of Cesser of Activity Section 40(13) notice received on: Application for Transfer of Licence Section 47 notice received on: Proposed Transferee Details name/ address Agency Decision on Transfer Request Transfer of Licence Effected Financial Provision re: Transferee Section 53(1) Application to Surrender Licence Section 48 Additional Monitoring etc. re: Application to Surrender Licence Section 48(4) Notification of Decision on Application to Surrender Licence Section 48(8).

Assessment of Principle & Description of the Project:

Principle: The principle of the project is considered satisfactory.

Description: The description of the project is considered to be satisfactory.

Assessment of Description of Physical Environment:

A good description of the physical environment is provided in the application documentation and previous file history.

Air

Dust - As the facility is now non-operational, the dust-monitoring programme is in suspended until site activities warrants its re-establishment. The most likely impact on air quality is from dust arising during the construction of the proposed development and emissions associated with construction vehicles and needs to be in place when the maintenance activities occur within the site for the application presently to maintain the lagoons.

Odour – could potentially impact on air quality from potential foul odour arising from the treatment process.

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 plastic wastes are not odorous and the process, will not be a source of odours. The only source of dust emissions are waste processing inside the building and vehicle movements on the yards during dry weather. The 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.



Water /Hydrology/hydrogeology/Noise and Vibration

Construction and maintenance of the proposed integrated wetlands lagoons, will involve the use of plant and machinery, installation of compounds, leachate plant and associated access roads. It has been determined in the previous history and application that the noise generated by machinery and plant activities are by analysis, ordinary occurrences in proximity to working agricultural land, landfill site and nearby quarries. Any construction noise generated during construction will attenuate to background levels long before reaching the nearest SPA site. On this basis it is considered that the proposed project does not have the potential to give rise to likely significant airborne noise related disturbance effects upon the SPAs.

The Environmental Health Service notes that this is currently closed therefore the operational stage and also the CEMP plan and therefore 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/operational maintenance of lagoons- 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/Pest Control

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

Conclusions

The Waste Facility Permit/Waste License will specify the monitoring requirements in the maintenance phase and monitoring stage, which may include:

- **Surface water quality**
 - **Groundwater quality**
 - **Emissions to air,**
 - **Noise**
-
- The Guidance on use of Disposal and Recovery Codes (Waste Management Act, 1996 as amended) should be reviewed within this applicant works and maintenance of the facility. This information is provided as a source of reference for operators completing waste surveys for the EPA. Under each of the disposal and recovery codes there are some examples of the types of activities that fall within the code, sourced from the Manual on waste statistics'- a handbook for data collection on waste generation and treatment (2013 edition), Eurostat (<http://ec.europa.eu/eurostat/web/waste/methodology>).
 - 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 when maintaining the site and lagoons etc.
 - 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 that access to maintain the site 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.
- That a complaints procedure is implemented and that a member of staff within the council 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.
- Desludging will be required, within the licence 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.
- Water monitoring results should be reviewed within the surrounding area 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 monitored where applicable. 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 licence (if granted); are implemented in full and are monitored to ensure the effectiveness of the mitigation when maintenance works occur within the lagoons area and site areas as a whole were applicable.

Catherine Deeney
Oifigeach Sláinte Comhshaoil | Environmental Health Officer

Eve Smith
Oifigeach Sláinte Comhshaoil | Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Finan Gallagher, Principal Environmental Health Officer, HSE West, County Clinic, St. Conal's Campus, Letterkenny Co. Donegal F92 FW6Y.**



**Príomhoifigeach Sláinte Comhshaoil
Seirbhís Sláinte Comhshaoil**

Clinic Contae,
Campas Ospidéal Naomh Conal,
Leitir Ceanainn, Co. Dhún na nGall
F92 FW6Y

**Principal Environmental Health Officer
Environmental Service**

County Clinic, St Conal's Hospital Camps,
Letterkenny, Co. Donegal
F92 FW6Y

www.hse.ie
[@hselive](https://twitter.com/hselive)

t 074 91 23759
e ehsadmindonegal@hse.ie

Date: 02/04/2024

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

Re: **EPA Reference Number:** W0062-03

Proposed Development:: Churchtown, Lifford, Donegal, A00 AA00 , National Grid
Reference N395986 E230985

Dear Sir/Madam,

Please find enclosed the HSE consultation report in respect of the above proposal. If you have any queries regarding this report, the initial point of contact is Principal Environmental Health Officer, details below.

Yours faithfully,

p.p. *Aoife Gardiner* A/PEHO
Finán Ó Gallchobhair

Príomhoifigeach Sláinte Comhshaoil | Principal Environmental Health Officer
Seirbhís Sláinte Comhshaoil Clinic Contae, Campas Ospidéal Naomh Conal, Leitir Ceanainn
,Co. Dhún na nGall F92 FW6Y.

Environmental Health Service County Clinic, St Conal's Hospital Campus, Letterkenny, Co
Donegal, F92 FW6Y.

0873772170 | Finan.Gallagher@hse.ie