



Submission

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| Submitter: | Mrs Arlene Ward |
| Organisation Name: | Health Service Executive |
| Submission Title: | W0313-01 |
| Submission Reference No.: | S011626 |
| Submission Received: | 17 June 2024 |

Application

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|------------|----------------|
| Applicant: | Sancom Limited |
| Reg. No.: | W0313-01 |

See below for Submission details.

Attachments are displayed on the following page(s).



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 13-06-2024

Type of consultation: *Waste Management Industrial Emissions*

EHIS Reference: 3969

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

If you have any queries regarding this report please contact, Derek Bauer principal Environmental Health Officer in the first instance.

Yours Sincerely

PP

A handwritten signature in cursive script, appearing to read 'Margaret Byrne'.

Derek Bauer
Principal Environmental Health Officer

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: 13.06.2024

Type of consultation: Industrial Emissions

Planning Authority: Kildare City Council

EPA Reference Number: W0313-01

EHIS Reference number: 3969

Applicant: Sancom Limited, Graney West, Castledermot, Co. Kildare, Castledermot, Kildare

Location of development: Graney West, Castledermot, Co. Kildare, Castledermot, Kildare, R14 NX78

General Comments:

Details of the application were circulated to HSE stakeholders on 18th June 2024

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore / Ina Kelly
- CHO – Mary O'Kelly

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

Sancom Ltd is a company involved in quarrying of materials for use in the construction industry. Sancom have operated a sand and gravel quarry facility at one of its sites based in Graney West, Castledermot, Co. Kildare. The quarry is no longer operational, as all useful materials have been extracted.

The proposed activity above will be for the purposes of recovering said materials through land deposition, and to achieve the improvement and development of land and site restoration and will be in accordance with Condition 3 (a) of the planning permission for the existing quarry (Planning Ref. 06/2802) which requires that restoration operations shall be carried out in a progressive manner throughout the life of the proposed development to control the scale of development and in the interests of visual and residential amenity and the proper planning and sustainable development of the area.

The material accepted on-site for backfilling will be inert and will comprise subsoil, clay, gravels, topsoil, stone and mixtures of such. As per the EIAR report materials will be sourced from construction sites in the Greater Dublin Area. The applicant has not determined the exact sites of sourcing. The proposed activity will include the placement of cover soils and seeding and return to use as agricultural grassland as prescribed for in the existing planning permission for the site (Planning Ref. 06/2802 Condition 12).

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"**

This report only comments on Environmental Health impacts of the proposed development from the viewpoint of the Environmental Health Service (EHS). A site visit was conducted by Ms. Margret Byrne Senior Environmental Health Officer on the 12th June 2024. There are no records of any complaints received by the Environmental Health Service in relation to the operation of the existing quarry.

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

Site Location

The application site is located in the townland of Graney West, approximately 2 kilometres from the town of Castledermot and 12 kilometres from the town of Balltinglass, in Co. Kildare. The site is located in a rural area that is characterized by one off housing and dominated by agricultural activity. A number of historic sand and gravel extraction sites are located in the broader area. There are a small number residential developments in the vicinity of the site, mainly to the east, north and south of the application site.

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.

Assessment of Description of Physical Environment:

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

Geology / Soils

The site is underlain by gravels derived from limestone that extended to the west, north and the east and a narrow band of alluvium along the southwestern site boundary which is separate from the River Graney alluvium. Other sediments in the area include Tills derived from limestone and granites and the alluvium along the route of the River Graney.

The present site is almost completely stripped of soil cover to allow excavation of sands and gravel. Prior to the extraction of sands and gravels, the soil types mapped in this area are classified by the GSI as BminSW or shallow well drained mineral soil and BminPD shallow poorly drained mineral soil derived from mainly calcareous plant material. According to Teagasc online soil database these soils are known as Elton (1000c) fine loamy drift with limestones.

The site is a previously excavated sand and gravel quarry. No other quarries or similar type of development that could impact on the soil and geology environment is present in proximity to the site. No further excavation works are proposed across the site. Therefore, it is considered that the overall development will have an imperceptible cumulative impact on the underlying geology.

Air and Climate

The EPA ambient air quality databases indicate the air quality in the vicinity of the site is good. No limits prescribed in the Air Quality Standards Regulations 2011 for any of the relevant parameters have been exceeded. Generally, low levels of these pollutants have been recorded in the region which is predominately rural.

The Air/Dust assessment has outlined that there is a negligible to low risk with the proposed activity to the sensitive receptors surrounding the subject site. The Dust Impact Assessment concluded however that a number of receptors in the receiving environment are likely to be subject to slight adverse dust effects as a result of dust generating activities associated with the proposed activity.

Nonetheless the EIAR assessment outlines that with the adoption of the stipulated mitigation measures outlined in Attached 7-1-3 Air Dust Impact Assessment Section 4 of and EIAR Volume 2 Main Body Section 5.7.2 "Dust Controls "dust generating activities associated with the proposed activity will not have a significant impact upon sensitive receptors in the baseline environment. The EIAR has **"deemed that there will be no significant climate or odour impacts associated with the proposed activity"**

The EHS would recommend that in the operational phase this facility should monitor emissions in accordance with the waste facility permit and licence.

Odour – The EIAR states that waste brought on-site will be inert construction and demolition waste, which is unreactive both biologically and chemically and will not cause any odour.

Biodegradable garden waste will be accepted on-site for composting. This waste will be transferred without delay to a bunded composting area on-site for curing/maturation.

The EHS welcomes that daily olfactory inspections will take place to ensure odours are negligible. Odour incidents or complaints will be recorded and corrective/preventative actions will be planned and implemented.

Climate Change- The EIAR Assessment conveys that the impact of greenhouse emissions associated with proposed activity upon climate conditions is deemed to be imperceptible given the nature and scale of the proposed activity.

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.

The Environmental Health Department requests that the mitigation measures outlined in Attached 7-1-3 Air Dust Impact Assessment Section 4 of and EIAR Volume 2 Main Body Section 5.7.2 “Dust Controls “ should include and recommends that these measures alongside the CEMP should be included as conditions of planning permission, if granted.

Water /Hydrology/hydrogeology;

The River Graney, located in the South Eastern River Basin District hydrometric area, subcatchment, is a stream which rises near Knockpatrick Hill and Corballis Hill and flows into the River Lerr at Castledermot. The River Graney and the River Lerr are tributaries of the River Barrow. The extracted quarry has a catchment of approximately 18.3 Ha.

The nature of the development dictates that the greatest potential impact on the underlying aquifer and proximate streams/rivers associated with the soil recovery facility will be during the operational phase of the works. The EIAR has predicted that the hydrogeological and hydrological impacts associated with the development will be short to long-term and imperceptible to moderate.

Monitoring prior to, during and post construction works of groundwater and surface water quality shall be undertaken to ensure minimum disturbance of water quality in the general vicinity of the site. The monitoring programme shall include daily checks, weekly inspections, and monthly audits to ensure compliance with the Construction & Demolition Waste Management Plan (C&DWMP) and the CEMP. This shall be undertaken in consultation with the requirements of Kildare County Council. Groundwater quality monitoring shall be undertaken within the three groundwater monitoring points on-site

and surface water monitoring shall be undertaken. Furthermore there will be an agreed program of monitoring shall be developed in consultation with Kildare County Council

The Environmental Health Department requests that the mitigation measures outlined in both EIAR Volume 2 Main Body Section 5.7.5 Protection of Waters and the Attached 7-1-2 Ground Water Assessment Section 2.14 “ should include and recommends that these measures alongside the CEMP should be included as conditions of planning permission, if granted.

Noise and Vibration

The EPA has produced guidelines for Quarries (Environmental management in the Extractive Industry) which define noise limit values for extractive industry sites. Activities occurring on these sites shall typically not give rise to noise levels off-site at any Noise Sensitive Location (NSL) in excess of these limits

The Ambient Noise levels predicted by the acoustic consultant and outlined in the EIAR at NSL's do not breach the EPA's prescribed day-time noise limit of 55 dB at any NSL (the facility does not operate during evening or night-time as defined by the EPA). Furthermore the EIAR stipulates that adoption and implementation of these mitigation measures in section 5 of the Noise Emissions Assessment will ensure noise will be controlled and maintained at an acceptable level.

The Environmental Health Department requests that the Noise control Measures outlined in both the EIAR Volume 2 Main Body 5.7.3 Noise Control and Attached 7-1-4 Noise Emissions Assessment Section 5 within the CEMP plan 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.

Waste Acceptance Procedures are in accordance with provisions of the Landfill Directive and Council Decision 2003/33/EC on Waste acceptance criteria in landfills and the EPA's Guidance Document on 'Waste Acceptance Criteria and Development of Soil Trigger Values for EPA Licensed Soil Recovery Facilities should be implemented.

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 in the EIAR Volume 2 Main body in section 5.7.4.4 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. .
- 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.

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to Derek Bauer Principal Environmental Health Officer, Environmental Health Service, Health Service Executive, Curragh Road Kildare.**

Arlene Ward

Arlene Ward
Environmental Health Officer

Margaret Byrne

Ms Margaret Byrne
Environmental Health Officer