



Submission

Submitter:	Mr Arlene Ward
Organisation Name:	Health Service Executive
Submission Title:	EPA Licence
Submission Reference No.:	S011748
Submission Received:	19 September 2024

Application

Applicant:	Diageo Ireland Unlimited Company
Reg. No.:	P1216-01

See below for Submission details.

Attachments are displayed on the following page(s).



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Feidhmeannacht na Seirbhíse Sláinte,
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Office of Environmental Sustainability
EPA
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County Wexford

EPA Ref: P1216-01
EHIS Ref No: 4164
Date: 18th September 2024

Re Application for: Industrial Emissions (IE) Licence

Applicant Name and Address: Diageo Ireland Unlimited Company, Diageo Ireland, St. James Gate, Dublin 8, Dublin (IDA Newbridge Business & Technology Park, Littleconnell, Newbridge, Kildare, A00 A000)

Class and Nature of Activity: "Class 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."

Dear Sir/Madam,

Please find enclosed the HSE Submission Report regarding an application for an Industrial Emissions Licence application for the above site. The following HSE departments were made aware of the consultation request for the proposed development on 26th September 2024

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

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


pp.

Derek Baurer
Principal Environmental Health Officer

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

1. 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 Site is located within the new IDA Newbridge Business and Technology Park (Littleconnell) ca.2.4km northeast of Newbridge, Co. Kildare. The Site is located immediately to the South-East of the completed Newbridge South Orbital Relief Road (NSORR), which links the R445 and Great Connell roads as a by-pass for Newbridge town itself. The facility is located in an industrial estate just off the M7 motorway close to Naas town.

The main process at the facility is beer production. The Facility will consist of:

- Raw materials intake;
- Brewhouse with process lines;
- Silos containing various storage/process vessels;
- Utilities;
- Tanker filling station for dispatch;
- Heavy Goods Vehicle (HGV) access;
- Employee and visitor access and parking;
- Security gates and fencing;
- Utilities building containing:
 - Two biogas-fired boilers;
 - One electric boiler; o Heat pumps;
 - Cooling plant;
 - Hydrotreated Vegetable Oil (HVO) tank;
 - CO2 recovery plant, etc.
- Water Treatment Plant (WTP)
- Waste Water Treatment Plant (WWTP), including a biogas plant; and,
- Water Recycling Plant (WRP)

Proposed emissions arising from the facility are emissions to, air, noise, and odour. It has been advised that there will be no discharge of any process emissions to surface water, to groundwater or to ground

The Non-Technical Summary accompanying the application details the legislative requirement for the licence application. This application for an Industrial Emissions Licence (IEL) is for activities which fall under Class 7.8 of the First Schedule of the EPA Act 1992 as amended:

“Class 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.”

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 this licence application.

In respect of this application, the areas reviewed were those of concern to Environmental Health which are

- Any potential contamination of surface or groundwater
- Emissions to air including odour and noise

The Environmental Health Service notes that a number of BAT and BREF documents were referenced as part of the licence application.

2. Noise

The Non-Technical Summary Section 2 states that the facility will operate ‘on 24 hour, 7 days a week, year round basis with shift work’ basis. The Non-Technical summary also outlines that there are a number of different noise sources associated with the operation of the facility, categorised as plant noise emissions (building services and roof noise emissions) and mobile noise emissions (movement of fork lifts, HGVs and cars/vans around the site).

Chapter 3.4 of the Noise Impact Assessment states that ‘the nearest Noise Sensitive Location is NSL 01 located ca.360m to the southeast’.

Noise Condition of the Industrial Emission licence 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:

Table 6-1: Applicable Noise Criteria at NSRs

Parameters	Daytime 07:00 to 19:00	Evening-Time 19:00 to 23:00	Night-Time 23:00 to 07:00
L _{Ar} (30 minutes)	55	50	-
L _{Aeq} (15 minutes)	-	-	45
There shall be no clearly audible tonal or impulsive component in the noise emission from the Site audible at any Noise Sensitive Location (NSR).			

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 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 concern. 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.

The report has outlined a number of mitigation measures to reduce noise levels at this location.

The Environmental Health Service notes the maximum day time and night time noise levels proposed for the NSL which is indicated in Attachment 240809 ‘Noise Impact Assessment’ and notes that it is proposed to undertake noise monitoring on an

annual basis. As this is a new facility and introduces a potential new noise source, it is recommended that monitoring is undertaken on a six monthly basis for the first year of operation of the plant.

It is recommended that mitigation measures are put in place should noise exceedances be noted at the site boundary or noise related complaints be received from members of the public.

3. Odour

The facility has a total of eight minor emissions points associated with the production at the Brewhouse on site. A total of nine point sources were utilised as part of odour modelling one source was used to model the “most offensive odour” associated with the WWTP and the remaining seven sources were utilised to model the “less offensive odour” associated with the Brewhouse production.

The Odour Dispersion Modelling Report undertaken as part of the licence application concludes that *emissions to air from the facility will have no significant impact on the environment or human health. Furthermore, the results in Section 5 of the Odour Dispersion Modelling Report in Table 5.2.1, 5.2.2, 5.2.3 demonstrates compliance with the relevant Guidance EPA’s Odour Emissions Guidance Note ((AG9).*

It is recommended that the boilers are inspected annually and that any necessary repairs or adjustments are undertaken immediately in order to ensure that emissions to air are maintained within agreed licenced parameters.

4. Assessment of Air emissions

The applicant submitted an air dispersion modelling report by Malone O’Regan Environmental 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 PM_{2.5}) and modelling was carried out to determine if ambient concentrations were in compliance with Air Quality Standards.

Predicted short- and long- term concentrations of the relevant pollutants (NO_x, SO₂, PM₁₀, PM_{2.5}), outside the Site boundary and at sensitive receptors are significantly below Air Quality Standards as shown in Section 4 of Air Dispersion Modelling report.

The results for annual average for NO_x and SO₂ demonstrate that Process Contribution from the boilers is only a small fraction of the background concentrations as expected for minor emission points. The same is true for daily (SO₂) and hourly (NO_x and SO₂) averaging of the Process Contribution. Therefore, the annual, daily and hourly average Process Contributions for NO_x and SO₂ for both biogas and HVO fuel scenarios are considered negligible in terms of environmental impact.

The results for annual average for PM₁₀ and PM_{2.5} demonstrate that Process Contribution from the major dust emission points is only a small fraction of the background concentrations as expected for minor emission points. The same is true for daily PM₁₀ averaging of the Process Contribution. Therefore, the annual and daily average Process Contributions are considered for PM₁₀ and PM_{2.5} negligible in terms of environmental impact.

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. *“Therefore, it can be concluded that emissions to air from the operations at the Diageo facility, for both biogas and HVO fuel scenarios, will not have a significant impact on the environment or human health”*. The EHS is satisfied that the facility complies with relevant air quality standards which will protect public health.

Recommendations

The National Environmental Health Service makes the following recommendations in respect of this licence application:

- The boilers are inspected annually and that any necessary repairs or adjustments are undertaken without delay in order to ensure that emissions to air are maintained within agreed licenced parameters.
- That noise monitoring is undertaken on a six monthly basis for the first year of operation of the plant and that
- Mitigation measures are put in place should odour and/or noise exceedences be noted at the site boundary or odour and/or noise related complaints be received from members of the public.

Arlene Ward

Arlene Ward
Environmental Health Officer