



### Submission

Submitter:	Elaine Sunderland
Submission Title:	Submission
Submission Reference No.:	S005760
Submission Received:	20 September 2019

### Application

Applicant:	MSK Silversands Ltd
Reg. No.:	W0305-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

H.S.E. South,  
Environmental Health Service,  
Whitemill Industrial Estate,  
Wexford.

Telephone: +353 53 912 3522  
Fax: +353 53 914 2068

Date: 13 September 2019  
Submission to: EPA, P.O. Box 3000, Johnstown Castle Estate, Wexford  
Re: Waste Management Licence Application Reference W0305-01  
Applicant: MSK Silversands Ltd., Ballyfarnogue, Screen, Co. Wexford

Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above proposal.

If you have any queries regarding the reports the initial contact is Ms Siobhan Byrne, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully

A handwritten signature in cursive script that reads "Siobhan Byrne".

Siobhan Byrne  
PEHO

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**Waste Licence Application  
HSE Submission Report  
Environmental Health Service Consultation Report**

**Date:** 12 September 2019

**Our reference:** 0995

**Report to:** Environmental Licencing Programme,  
Office of Environmental Sustainability,  
Environmental Protection Agency,  
Johnstown Castle Estate,  
Co. Wexford.

**EPA reference:** W0305-01

**Type of Consultation:** Waste Licence Application

**Applicant:** MSK Silversands Ltd., Ballyfarnogue, Screen, Co. Wexford.

**Nature of Activity:** Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials and the storage of waste pending any of the operations numbered R1 to R12 (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)

**Introduction:** The following HSE departments were notified of the consultation request for the licence application on 16 August 2019

- Emergency Planning – David O'Sullivan
- Assistant National Director for Health Protection – Kevin Kelleher/Laura Murphy
- CHO –Kate Killeen White
- Estates – Helen Maher

A response has been received from Emergency Planning dated 10 September 2019.

This report only comments on Environmental Health impacts of the licence application.

## General

MSK Silversands Ltd has made an application to the EPA for a waste licence for the restoration of the extractive area of a sand/gravel quarry at lands in Ballinroouan, Screen, Co. Wexford, to existing landform levels through the importation of inert waste soils. The restoration will operate concurrently with the extraction/ quarrying of sand and gravel and take place over a 17 year period. The site area is approximately 8.45 hectares in total, with an extraction area of approximately 5.83 hectares.

It is proposed that 846 000m<sup>3</sup> (354,400 tonnes) of inert soil and stone will be imported at the site over approximately 17 years. The existing 3.6m of overburden (consisting of topsoil and subsoil) stripped during quarrying activities will be stored on site and used for the restoration of the quarry void.

It is intended that inert soil and stone used for filling the quarry void will be sourced from greenfield sites only.

The site comprises four agricultural fields and part of the existing sand and gravel quarry. The site is in a rural area within 2km of the R741 regional road which connects the towns of Gorey and Wexford.

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.

The Environmental Health Service has not received any complaints regarding the existing quarry or the restoration works undertaken to date.

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

- Any potential contamination of surface water
- Any potential contamination of ground water
- Emissions to air including noise and dust

Although it is acknowledged that this application is for a waste recovery activity and not for a waste disposal activity, the EPA's **Bat Guidance Note for the Waste Sector: Waste Transfer and Material Recovery** is the most relevant BAT document against which to review the licence application.

## Site location

The site is located at Ballinarooaun, a townland near Screen, Co. Wexford, with a population of 1111 (CSO 2016) and is approximately 1km west of Screen village. It is approximately 2.5km from Curraclloe, 4.5km from Castlebridge and 6.5km from Blackwater.

The nearest sensitive receptor is a residence located 330m to the south east of the site. Land use in the area is mainly agricultural. The area is characterised by the glacial landscape known as 'kettle and kame'

### **Public consultation**

It is the experience of the Environmental Health Service that early and meaningful public consultation minimises the risk of future complaints around the operation of a licensed facility. It is also recommended that a procedure for responding to complaints is put in place.

### **Surface water**

The Environmental Health Service has considered any potential risk of contamination of surface water from the proposed activities. It is noted that the Glenbough Stream is the only water course in the vicinity and its source is 300m west of the area which is subject to this application.

It is noted that the area is well drained and that *'there will be no surface water runoff generated within the proposed sandpit floor as all the effective rainfall will percolate to groundwater and contribute to the recharge of the latter'*

**The Environmental Health Service notes the mitigation measures outlined in Chapter 4.8.1 Operational Report which if implemented in full should minimise the risk of pollution of surface water.**

### **Ground water**

The subject site lies above the Kilmuckridge/Screen Hills sand and gravel aquifer, which has been classified as a regionally important aquifer. The area is classified as 'high vulnerability' on the GSI Aquifer Vulnerability Map. **The Environmental Health Service recommends that the proposal to maintain the final sandpit floor depth at least 5m above the highest water table is strictly adhered to at all times.**

There will be no requirement for abstraction of groundwater in order to excavate the proposed site.

The application indicates that there are no domestic wells in the area and that local residences are on a mains water supply. It is noted that there is a well on the applicant's farm which is used for agricultural purposes. A number of monitoring wells have been bored around the quarry. Results from monitoring of one of these wells (MW4) has indicated elevated levels of nitrates, which has been attributed to agricultural activity in the adjoining lands. The EIAR of November 2017 indicates that slurry will not be spread over the restored land.

The nature of materials accepted at the facility as fill for the quarry void is outlined in Chapter 5.3.2 of the Non-Technical Summary '*Waste Acceptance*'. It is noted that imported inert soil will be classified by the supplier and documentation proving its characteristics and source must be available. Material whose origin cannot be proven will not be accepted on site.

Mitigation measures to protect groundwater have been outlined in the EIAR which accompanied the November 2017 planning application. **Due to the location of the site with regards to the Kilmuckridge/Screen Hills sand and gravel aquifer (regionally important aquifer) the**



**Environmental Health Service re-iterates that mitigation measures, in particular relating to fuel spills and the grading and screening of imported waste soil are adhered to.**

#### **Emissions to air**

- **Noise**

Chapter 4.1.6 of the application states that *'as there is no crushing, grading or blasting occurring on site the impact of vibration is not relevant'*

Four noise sensitive locations were used by the applicant during noise monitoring which was undertaken on 28.11.2015. It is noted that the quarry pit will operate as a natural sound attenuation barrier during the restoration of the quarry. The hours of operation have been specified in the application (EIAR Chapter 10). Mitigation measures to minimise noise impacts have been outlined in Chapter 5 *'Remedial and Mitigation Measures'* of Attachment 7-1-3-3 Noise Emission Impact Assessment.

Suggested mitigation measures outlined in the application include –

- The strategic placement of stockpiles between sources and receivers in order to reduce noise levels being directed towards sensitive receptors.
- Noise damping to minimize resonant noise associated with plant, equipment, body panels, cover plates etc.
- Noise caused by vibrating plant components can be reduced by proper balancing, through the use of rubber pads, springs or bellows in mounting plant or equipment. (I.e. vibration isolation) or through the mechanical fixing of plant parts (i.e. tightening of loose components, fixing of resilient support material between surfaces in contact).
- Noise caused by friction in conveyor rollers can be reduced through the timely application of lubrication.
- Regular visual inspections and maintenance of plant components can reduce noise levels associated with loose, defective or damaged plant or equipment

**The Environmental Health Service recommends that these measures are implemented in order to minimise noise from the site.**

- **Dust**

Attachment 7-1-3-4' Dust Emission Impact Assessment' details the construction phase and operational phase impacts of dust from the proposed development.

The Environmental Health Service notes the outcome of dust monitoring taken at four locations adjacent to the site during the period 2013-2015 and further notes that it is predicted that dust emissions during the restoration process will remain similar to current levels. The Dust Emissions Impact Assessment states *that' no dust monitoring result recorded on-site has exceeded the TA Luft limit<sup>3</sup> of 350 mg/m<sup>2</sup>/day'*

The site was visited by a Senior Environmental Health Officer on 2 September 2019 and on a number of occasions in the last three years in respect of planning applications. It was noted during these visits that dust mitigation measures had been implemented and that areas of the site already subject to restoration works have now been returned to agricultural use.

The site (quarry pit) is currently below ground level and at the earlier stages of the development this will act as a natural dust barrier which will help to control dust.

It is anticipated that 36 vehicles will transport materials to the site on a daily basis.

**The Environmental Health Service has reviewed the dust mitigation measures outlined in Section 5 of Attachment 7-1-3-4 and is satisfied that if implemented in full should be sufficient to protect public health.**

EPA Application Form Attachment 4-3-5' *Waste Acceptance Procedure*' details the procedure for accepting/rejecting soil and stone deliveries to the site. Section 1.4 Waste Rejection states that '*Any waste deemed unsuitable for processing at the installation shall be immediately reloaded onto the delivery vehicle and returned to the customer. Where this is not feasible, the waste shall be separated and stored temporarily on site and subsequently removed from the installation at the earliest possible time*' **If this operation is to be undertaken by hand, measures should be taken by the applicant to protect the health of staff involved in the manual segregation of such materials. This should involve the provision of PPE (construction gloves), hand washing facilities and First Aid facilities.**

#### Conclusion

- The Environmental Health Service recommends that a system is put in place for dealing with any complaints from members of the public
- Mitigation measures outlined in Chapter 4.8.1 Operational Report must in full should minimise the risk of pollution of surface water.
- The Environmental Health Service recommends that the proposal to maintain the final sandpit floor depth at least 5m above the highest water table is strictly adhered to at all times.
- The Environmental Health Service recommends that mitigation measures, in particular relating to fuel spills and the grading and screening of imported waste soil are adhered to in order to protect groundwater.
- It is recommended that mitigation measures outlined in Attachment 7-1-3-3 Noise Emission Impact Assessment are implemented in full in order to minimise noise from the site.
- Dust mitigation measures outlined in Section 5 of Attachment 7-1-3-4 should be implemented in full in order to protect public health
- Measures should be taken by the applicant to protect the health of staff involved in the manual segregation of soil and stone materials. This should involve the provision of PPE (construction gloves), hand washing facilities and First Aid facilities.

Anne Deacon  
Environmental Health Officer  
Wexford

Caroline Hueston  
Environmental Health Officer  
Environment Operational Unit

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<b>HSE South Emergency Management Consultation Report</b>			
<b>Report to</b>	Siobhan Byrne, PEHO, Wexford	<b>Date</b>	10 Sept., 2019
<b>Type of consultation:</b> EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
<b>Other (please specify):</b> Waste Management Licence Application			
<b>Authority</b>	Environmental Protection Agency		
<b>Authority Reference Number</b>	W0305-01	EHIS 0995	
<b>EM Reference Number</b>	EMENV021		
<b>Applicant</b>	MSK Silversands Ltd., Ballyfarnogue, Screen, Wexford		
<b>Proposal</b>	Recycling/reclamation of other inorganic materials, which includes soil cleaning of inorganic construction materials and storage of waste pending collection on the site		

**HSE South Emergency Management Observations:**

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the `ETHANE` format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e. a green sign with a yellow border and white lettering citing the abbreviation RVP.
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the `off-site` impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*.  
<https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or [maryanne.horgan@hse.ie](mailto:maryanne.horgan@hse.ie)

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**Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance Service and / or Fire and Rescue Service**

**WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)**

<b><u>GIVE THE FOLLOWING INFORMATION</u></b>	
This is: _____ Eircode _____ (Name, Telephone Number and Eircode Address of site)	
<b><i>An incident has occurred at this site - standby for ETHANE message</i></b>	
<b>E</b>	
	<b>Exact location of the incident</b>
<b>T</b>	
	<b>Type of incident, e.g.: fire, explosion, gas leak, etc</b>
<b>H</b>	
	<b>Hazards – current and potential</b>
<b>A</b>	
	<b>Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)</b>
<b>N</b>	
	<b>Number of casualties and their condition – specify adult / children if known</b>
<b>E</b>	
	<b>The emergency services present and required</b>
<b><i>N.B. If you require another emergency service stay on the line and repeat the steps again</i></b>	

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