



### Submission

Submitter:	Miss Siobhan Murphy
Organisation Name:	HSE
Submission Title:	HSE Submission 0287 02 EHS 1842
Submission Reference No.:	S010083
Submission Received:	25 August 2021

### Application

Applicant:	Ormonde Organics Limited
Reg. No.:	W0287-02

See below for Submission details.

Attachments are displayed on the following page(s).

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<b>HSE South Emergency Management Consultation Report</b>			
<b>Report to</b>	<b>Siobhan Murphy, PEHO, Waterford</b>	<b>Date</b>	<b>5<sup>th</sup> July, 2021</b>
<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: Industrial Emissions (IE)</b>			
<b>Authority</b>	<b>Waterford City &amp; County Council</b>		
<b>Reference Number</b>	<b>EHIS Ref. No. 1842 EPA Ref. No. W0287-02</b>		
<b>EM Reference Number</b>	<b>EMENV087</b>		
<b>Applicant (Consultants)</b>	<b>Ormonde Organics Ltd., Ballinalacken, Attanagh, Kilkenny</b>		
<b>Proposal</b>	<b>Recovery and disposal of non hazardous waste with a capacity exceeding 75 tonnes per day. Capacity threshold shall be 100 tonnes per day.</b>		

**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)

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

**Date:** 23 August 2021

**Our reference:** 1842

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

**Type of Consultation:** Waste Licence Application

**EPA Reference:** W0287-02

**Applicant:** Ormonde Organics Limited, Ballinalacken, Attanagh, Co. Waterford

**Nature of Activity:** Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Water Treatment Regulations 2001 (SI No. 254 of 2001) apply):

- i. Biological treatment; when the only waste treatment activity carried out is anaerobic digestion, the capacity threshold for this activity shall be 100 tonnes per day

### Introduction

The following HSE Departments were notified of the consultation request for the licence application on 2 July 2021.

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

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

### General

Ormonde Organics Ltd. intends to apply to the EPA for a review of the Industrial Emissions Licence (Waste Licence) (No. W0287-01) for its existing anaerobic digestion facility at Killowen, Portlaw, Co. Waterford.

Activities currently undertaken in the existing facility are

- Municipal wastewater treatment sludge,

- Household biodegradable kitchen and canteen waste,
- Other biodegradable waste (Garden & Park Waste), and
- Septic Tank Sludge.
- Non-hazardous industrial and water treatment sludge.

Ormonde Organics Ltd. proposes to increase the annual waste intake to 80,000 tonnes. This will involve the construction of an extension to the anaerobic digestion intake building, installation of an additional odour abatement unit, construction of compost maturation building and canopy, provision of one new digestate storage tank and one new digester and the expansion of the paved areas.

The reasons for the licence review are

- Additional class of activity
- Increase in capacity and
- Other

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

The Environmental Health Service notes that a number of BAT documents were referenced as part of a review of the facility, including

- *'Best Available Techniques (BAT) Reference Document for Waste Treatment 2018'*

This is the most relevant document against which to review the licence application.

### **Site Location**

The site is located approximately 12km north west of Waterford City and approximately 3km north of Portlaw. It is situated approximately 100m off the R680 Waterford to Carrick on Suir road. The River Suir and the Waterford/Kilkenny county boundary is located approximately 250m to the east of the site. There is farmland adjacent to the site.

### **Public Consultation**

The Environmental Health Service was unable to locate any reference in the EIAR accompanying the licence application to public consultation undertaken by the applicant.

Whilst it is noted that the facility has been in operation at the site since 2007, 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 licenced facility. It is also good practice to ensure that a

designated member of staff has responsibility for dealing with complaints and queries from members of the public.

### Surface Water

The Environmental Health Service has considered any potential risk of contamination of surface water from the proposed activities. Chapter 8 of the Non-Technical Summary states that rainwater run-off will continue to discharge into the River Suir which is linked to the site by two unnamed tributaries located 500m to the north and to the south of the site.

It is noted that a new storm water attenuation pond will be installed to control the discharge of additional run off into the River Suir.

The site is located within the Suir River Catchment. The Middle Suir Estuary, the waterbody nearest to the facility, is classified as being of 'poor' status and 'at risk' of not meeting environmental objectives by 2027.'

Chapter 8.3.1.3 'Storm Water Monitoring' provides the results of storm water monitoring undertaken in August 2020. **The Environmental Health Service recommends that, due to the 'at risk' status of the River Suir in this locality, emission limits for storm water discharges to the River Suir are specified in the licence review.**

It is noted that the provision and maintenance of an oil interceptor is included as a condition of the existing EPA licence.

### Ground Water

Water used on site is obtained from two onsite wells. Monitoring undertaken has confirmed that well water quality is good.

Chapter 8.4 'Impacts' of the EIAR outlines the potential impacts on water quality which may arise during the operation of the enhanced facility. These include the potential for leaks and/or spills to occur *'during the delivery and handling of the incoming wastes, the storage and removal of the digestate that could enter the surface water drains and/or infiltrate to ground via damaged paving and leaking sewers. In the event of a fire there is the potential for contaminated firewater run-off to enter the storm water drains and infiltrate to ground.'*

Mitigation measures to minimise any impacts on water quality are outlined in Chapter 8.6 'Prevention and Mitigation Measures.' **The Environmental Health Service is satisfied that these measures, if implemented in full, are sufficient to prevent likely significant impacts on public health. The EHS recommends that these measures, which are conditions of the existing licence, should be included as conditions of the revised licence.**

### Wastewater

The EIAR states that *'leachate generated in composting process is collected and stored in underground storage tanks located inside the building from where it is recirculated in the process'*. Wastewater generated from sanitary facilities is mixed with incoming waste and fed into the anaerobic digesters.

## **Emissions to air including noise, dust and odour**

### **Noise**

The site is located in a predominately rural, agricultural area. The nearest dwelling is situated 260m from the site, with a farm 290m to the west and a commercial orchard 430m to the south of the site entrance.

Chapter 11.3 'Receiving Environment' states that *'the noise limits specified in Schedule B4 of the EPA licence (55 dB daytime, 50 dB evening and 45 dB night-time) only apply to the two offsite stations. The specific LAeq T levels at these stations attributable to the site were less than 48 dB during the daytime, and 35 dB or less during the evening and night-time. No tones or impulses were detected at on and off-site offsite locations'*.

Operational noise generating plant and machinery has been identified as including –

- Waste transport and staff and visitor vehicles;
- Mobile plant;
- Aeration and extraction fans;
- Feed hoppers, pumps and conveyors;
- Expired food debagging plant, and
- Air compressors.

The aeration and air extraction fans are operational on a continual basis whereas the remaining plant and machinery are usually only active between 07.00 am to 19.00 pm Monday to Saturday.

The existing licence requires noise monitoring surveys to be undertaken on an annual basis both on and off site. Assessment of the information provided in the application, including the EIAR, indicates that noise levels from the operation of the facility do not have a significant impact on the nearest sensitive receptors, including on occupied dwellings.

### **Dust**

The site of the proposed development lies within the EPA's Air Quality Zone D. The EPA's Air Quality Index for Health for the area in which the Ormonde Organics facility is located is classified as 'good'

Dust mitigation conditions are attached to the existing licence and these are detailed in Chapter 10.6.2 'Operational Stage' of the EIAR accompanying the licence. Mitigation measures include

- Undertaking all waste treatment and storage inside buildings or in enclosed vessels
- The provision of dust curtains or approved equivalent at entry and exit points from the waste buildings
- Ensuring that all external doors are kept closed when not in use

The current licence requires dust monitoring to be undertaken at four locations on a quarterly basis. The results of monitoring included in the EIAR indicate that dust deposition levels are significantly below the maximum permitted deposition limit of 350mg per m<sup>2</sup>/day when averaged over a thirty day period.

Chapter 10.7.2 'Dusts' states that the proposed development *'will not results in any new point dust emission sources nor give rise to any additional fugitive dust emission sources, with the exception of an increase to the hard standing area'* in the operational phase..

Attachment 7.4.1 'Emissions to Atmosphere Main and Fugitive Emissions Attachment' lists 'dust from movement of vehicles on yard surfaces' as a potential source of fugitive dust emissions. To mitigate the impact of this, the yard area will be dampened down during periods of dry weather.

**The Environmental Health Service recommends that the existing dust mitigation measures are included as conditions of the reviewed licence**

## Odour

Chapter 10.4 'Impacts' states that '*in the operational stage there is the potential to impact on air quality due to fugitive dust and odour emissions and point source emissions from the CHP gas engines and flare stacks*'

Odour control measures are implemented by Ormonde Organics which are included as conditions of the current EPA licence. These measures are designed to ensure that '*waste activities do not give rise to negative impacts on air quality*'. Existing mitigation measures are described in Chapter 10.6.2 'Operational Stage' of the EIAR.

It is noted that a new odour abatement system will be installed on the new feedstock building which will comprise air extraction and a new biofilter. The EIAR states that '*the abatement system will be designed to meet the negative air pressure requirements and the odour emission limits specified in the EPA licence*'. The Environmental Health Service recommends that details of this new air abatement system is provided to the EPA before the revised licence is issued.

As part of the EIR process, odour monitoring results for 2020 were reviewed and the results are outlined in Table 10.3 'Odour Monitoring Results'. Results are noted to be in compliance with odour emission limit values specified in the existing licence conditions.

In addition to the odour mitigation measures outlined in Chapter 10, the Environmental Health Service recommends that all odour control and monitoring plant and equipment is subjected to a bi-annual maintenance inspection.

## Conclusion

- **Due to the 'at risk' status of the River Suir in this locality, emission limits for storm water discharges to the River Suir are specified in the licence review.**
- **Mitigation measures to minimise any impacts on water quality, noise, odour and dust which are conditioned in the existing licence should be included as conditions of the revised licence.**
- **All odour control and monitoring plant and equipment is subjected to a bi-annual maintenance inspection**



Siobhan Murphy  
Principal Environmental Health Officer  
Local Health Office, Cork Road, Waterford

*Caroline Huester*

Environmental Health Officer  
Environment OU  
Ennistymon Health Centre  
Ennistymon  
Co. Clare

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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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**R.V.P.  
No.1**



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Department,  
HSE South -Waterford  
Waterford Community Services,  
Cork Road  
Waterford.

Tel: 051 842957

**Date:** 23 August 2021

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

**Re:** Waste Management Licence Application W0287-02

**Applicant:** Ormonde Organics Limited,  
Ballinalacken, Attanagh,  
Co. Waterford

**EHIS Ref:** 1842  
**Your Ref** W0287-02

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Dear Sir/Madam

Dear Sir/Madam

Please find enclosed the HSE consultation report(s) in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Ms. Siobhán Murphy, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully,

Siobhán Murphy  
Principal Environmental Health Officer