



Submission

Submitter:	Mr Cian McSweeney
Organisation Name:	HSE Environmental Health Service
Submission Title:	HSE Submission Report EHIS 2187 EPA W0211-03
Submission Reference No.:	S010253
Submission Received:	10 March 2022

Application

Applicant:	ERAS ECO Limited
Reg. No.:	W0211-03

See below for Submission details.

Attachments are displayed on the following page(s).

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North Lee Environmental Health Service,
Floor 2, Block 1 St Finbarr's Hospital,
Douglas Road,
Cork,

Phone: 0214921801
E-Mail: catherine.mccarthy@hse.ie

Date: 10 March 2022

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

Re: Industrial Emissions Licence Application Reference: W0211-03

Name and Address of applicant: ERAS ECO Ltd, Foxhole, Youghal, Co Cork

EHIS Reference: 2187

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. Catherine McCarthy Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours faithfully,

A handwritten signature in blue ink that reads 'Catherine McCarthy'.

Catherine McCarthy
Principal Environmental Health Officer

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Industrial Emissions Licence Application
HSE Submission Report
Environmental Health Service Consultation Report

Date: 10 March 2022

Our reference: 2187

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

EPA Reference: W0211-03

Type of Consultation: Industrial Emissions Licence Application

Applicant: ERAS ECO Ltd.

Location: Foxhole, Youghal, Co. Cork

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 Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): 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.

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General

ERAS ECO Ltd operates a biological treatment plant at Foxhole, Youghal, Co. Cork under an Industrial Emissions Licence (W0211-02) which authorises the drying of wastewater treatment plant sludges and the anaerobic digestion of organic materials including food waste. The current licence allows for the acceptance of 65,000 tonnes of waste per year 'of non –hazardous sludge and off specification food ingredients, landfill leachate and mixed dry recyclables' (EPA Application Form 1.2 Non-Technical Summary'). The facility stopped accepting and drying sludges in 2018. The operation of the anaerobic digestion plant is the only waste activity which is on-going at the facility.

The applicant has submitted a request for a licence review to reflect the changes in the waste operations and

- allow the acceptance and digestion of 65,000 tonnes/per year of organic waste
- bring the licence into alignment with the Industrial Emissions Directive (2010/75/EU) (the Directive) and S.I. No. 605/2017 - European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017, as amended, and
- facilitate the pre-treatment of waste for anaerobic digestion and future biogas connection to the national gas grid.

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 area in which the ERAS ECO Ltd facility is located was visited by Mr Cian McSweeney, Senior Environmental Health Officer on 4 March 2022 to assist in the preparation of this report.

The Environmental Health Service has not received any complaints regarding the current operation of the ERAS ECO Ltd facility.

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 odour

Site Location

The ERAS ECO Ltd facility is situated approximately 2km to the north of Youghal and approximately 0.5km to the west of the Blackwater River Estuary. Youghal Landfill site, operated by Cork County Council, is located within 100m to the north - east of the facility. Potential sensitive receptors in the vicinity include

- Youghal Clinic, a GP practice, is located within 150m to the north west of the ERAS ECO site boundary

- Remedy Health, a food supplement manufacturer, is located within 150m to the north west of the site boundary
- Yawl Bay Seafoods (a Sea Fisheries Protection Authority approved fish processing facility) is located within 300m to the west of the site boundary
- A residential home is located at the end of the access road to the ERAS ECO Ltd facility approximately 300m from the facility

Surface Water

The Environmental Health Service has considered any potential risk of contamination of surface water from the activities undertaken at the ERAS ECO plant. The existing licence (W0211-02) stipulates that *'stormwater from roofs and non-process areas (staff car park) are the only proposed discharge to surface water from the installation into the Blackwater Estuary SPA [004028] and Blackwater River (Cork/Waterford) SAC [002170]'*.

Attachment 7.1 'Emission Overview Attachment' indicates that there are no emissions to surface water/discharges to surface water from the facility and that there is one storm water emission point, which discharge stormwater from non-process related areas to two silt/ oil interceptors (Class 1) and a storm water retention tank. Run-off is reused on-site where possible and the surplus water is discharged to the Blackwater estuary.

Monitoring of this stormwater is undertaken on a weekly and a quarterly basis (depending on parameters). Sampling results are included in Table 2.1 'Storm Water Results (SW-1)' of Attachment 7.1.3 'Emissions Compliance Report'. Chapter 2.3 of this Attachment states that *'the results indicate that the quality of discharge is good and will not impact on the quality of water in the estuary'*.

Wastewater Emissions

The Environmental Health Service (EHS) notes that the existing licence (W0211-0) does not permit the discharge of treated process effluent into the Blackwater Estuary and Blackwater River. There is no process wastewater generated from the facility. Staff sanitary wastewater is treated in a proprietary wastewater treatment system ('Puraflo') before being discharged into the Irish Water mains sewer which connects to the Youghal municipal wastewater treatment plant.

Ground Water

The ERAS ECO site is underlain by up to 3m of made ground, which is predominately clay with a small amount of construction and demolition waste. It is located in the catchment of the River Blackwater. Rainwater from the site will continue to be discharged into the River Blackwater at the same quality and volume as it currently permitted. Rainwater discharges from the site via an oil interceptor and flow attenuation tank. Should an incident arise which has the potential to contaminate rainwater shut off valves on the drainage system can be closed to prevent an emission to the river.

Attachment 7.1 'Emissions Overview' indicates that there are no emissions or emission points to groundwater from the ERAS ECO plant.

Emissions to air including noise and odour

Noise

The site is located in a primarily industrial area of Foxhole, Youghal, which is approximately 43km east of Cork City and close to the county boundary with Co. Waterford.

The ERAS ECO site operates in accordance with conditions relating to noise which is specified in the existing Industrial Emissions licence (W0211-02) which are

'Condition 5.5 - There shall be no clearly audible tonal component or impulsive component in the noise emissions from the installation at noise sensitive locations' and Condition 6.17 which states that *'the licensee shall carry out a noise survey of the site operations as required by the Agency'*

The Environmental Health Service notes that *'all waste reception, processing and storage is and will continue to be carried out inside the plant'* that *'the odour control system extraction fans are a continuous source of noise emissions'*. The Operational Report states that *'noise monitoring has established that noise levels from the plant and equipment comply with the limits set in the licence and that additional control measures are not required'* (Section 3.14.2 Noise)

Odour

The Emissions to Atmosphere Attachment 7.4.1 indicates that there are 2 main emission points to air. The incoming wastes, the anaerobic digestion process and the associated odour control system are sources of odour. The CHP stack and the back-up gas flare are point emission sources containing the biogas combustion products.

No odour was detected at the site boundary by Mr Cian McSweeney Senior Environmental Health Officer during his visit to the area on 4 March 2022.

The Environmental Health Service notes that the applicant intends to install a new carbon filter odour control system in the former sludge drying building to replace the previously decommissioned unit (Attachment 1.1 Reason for Review) and is satisfied that this will have the capability to address any potential increase in odour emissions arising as a result of this increased volume of raw material (expired food stuff)

Conclusion

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

- Best practice is adopted in the operation of the ERAS ECO facility to ensure that noise levels and odour emissions from the facility are minimised
- That the facility operates in accordance with the description provided and the mitigation measures outlined in the licence application. This is recommended for the protection of public health



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

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HSE South Emergency Management Consultation Report			
Report to	Catherine McCarthy, PEHO, Cork	Date	31st January, 2022
Type of consultation: EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
Other (please specify): Waste Management Licence Application (W0211-03) (Youghal, Co. Cork)			
Authority	EPA / HSE		
Authority Reference Number	EPA W0211-03 EHS 2187		
EM Reference Number	EMENV 124		
Applicant	ERAS ECO Limited, Foxhole, Youghal, Co. Cork		
Proposal	Recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day		

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://dbe.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

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WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

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

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R.V.P.
No.1

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