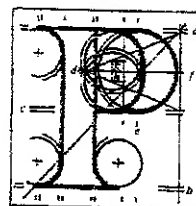


Our Case Number: ABP-319506-24



**An
Bord
Pleanála**

Health Service Executive
c/o Tom Mangan
4th Floor
Chamber House Chamber Square
Tallaght
Dublin 24

Date: 04 June 2024

Re: Modifications to existing Waste Treatment Facility to manage 24,000 tonnes of Healthcare Risk Waste
402 Grants Drive, Greenogue Business Park, Greenogue, Rathcoole, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.


The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Lauren Griffin

Executive Officer
Direct Line: 01-8737244

PA09

Tel
Glao Aitiúil
Facs
Láithreán Gréasáin
Riomhphost

Tel
LoCall
Fax
Website
Email
(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Shaun McGee

From: Bord
Sent: Friday 31 May 2024 10:06
To: SIDS; LAPS
Subject: FW: HSE Submission for ABP Case Reference: PA065-319506
Attachments: HSE submission Enva Waste Mgmt Rathcoole EHIS 3900.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Thomas Mangan <thomas.mangan@hse.ie>
Sent: Friday, May 31, 2024 9:57 AM
To: Bord <bord@pleanala.ie>
Subject: HSE Submission for ABP Case Reference: PA065-319506

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it concerns,

Please see the HSE submission for ABP case number: PA065-319506. Our Reference: 3900

Kind regards

Tom Mangan
Environmental Health Officer I Oifigeach Sláinte Comhshaoil
National Environmental Health Service HSE | Seirbhís Sláinte Comhshaoil FSS
4th Floor | Chamber House | Chamber Square | Tallaght | Dublin 24
Teach an Chomhlachais | Cearnóg an Chomhlachais | Tamhlacht | Baile Átha Cliath 24

Need information and advice on COVID-19? Go to www.hse.ie/coronavirus

"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhíse ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

"Information in this email (including attachments) is confidential. It is intended for receipt and consideration only by the intended recipient. If you are not an addressee or intended recipient, any use, dissemination, distribution, disclosure, publication or copying of information contained in this email is strictly prohibited. Opinions expressed in this email may be personal to the author and are not necessarily the opinions of the HSE.

If this email has been received by you in error we would be grateful if you could immediately notify the ICT Service Desk by telephone at [+353 818 300300](tel:+353818300300) or by email to service.desk@hse.ie and thereafter delete this e-mail from your system"



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902
bord@pleanala.ie

Date: 31st May 2024

Name: An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Proposed development: Modification to an existing waste treatment facility to manage 24,000 tonnes of healthcare risk waste

Location 402 Grants Drive, Greenogue Business Park, Greenogue,
Rathcoole, Co. Dublin D24 AP04

Applicant: Enva Ireland Ltd

EHIS Reference: EHIS 3900

ABP Case Reference: PA065-319506

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 23 April 2024

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

If you have any queries regarding this report please contact Ms. Patricia Doonan, Principal Environmental Health Officer, Clondalkin in the first instance at patricia.doonan@hse.ie

Yours sincerely

Patricia Doonan
Principal Environmental Health Officer



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

HSE Submission Report

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)

Date: 31 May 2024

Our reference: 3900

Report to: An Bord Pleanála

Type of consultation: Strategic Infrastructure Development

Applicant: Enva Ireland Ltd

Address of proposed development: 402 Grants Drive, Greenogue Business Park, Greenogue, Rathcoole, Co. Dublin, D24 AP04

ABP Case Reference No. PA065-319506

Proposed development: Enva Ireland Ltd currently operates a hazardous waste transfer/recovery facility within Greenogue Business Park under existing planning approval (Planning Reference No. SD09A/0050) and an EPA Industrial Emissions licence W0192-03.

Current activities at the site include the storage, bulking up and transfer of hazardous wastes such as contaminated soils and electrical transformers as well as hydrocarbon waste treatment and recovery of used packaging hydrocarbon storage drums.

Enva wishes to modify two of the three buildings (building 1 & 3) at the existing waste facility to provide for the future management of 24,000 tonnes per annum of health risk waste as part of the proposed development. The modification sought proposes to see no change in the tonnage of waste managed at the facility which stands at 111,000 gross annual tonnage. Health risk waste will therefore account for approx. 21% of the waste managed at the facility.

The construction phase of the proposed development is expected to be 18 weeks and a decommissioning phase is expected to be 8 weeks.

The site is located at 402 Grants Drive, Greenogue Business Park, Greenogue, Rathcoole, Co. Dublin D24 AP04 and is stated to be operational 24 hours a day, 7 days a week for 50 weeks per annum.

Introduction

The local Environmental Health office in Clondalkin was consulted during the preparation of this report. Input was received from Mr. Thomas Mangan, Senior Environmental Health Officer.



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

The Environmental Health Consultation Report only comments on Environmental Health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the Environmental Health viewpoint.

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

1. Assessment of the principle and description of the project

As described earlier the applicant wishes to modify the existing waste management facility to provide for the future management of 24,000 tonnes per year of health risk waste. The modification does not alter the tonnage of waste managed but rather the types of waste managed. The Non-Technical Summary (NTS) of the EIAR describes the “Health Risk Waste” as the solid or liquid waste arising from healthcare and medical activities such as diagnosis, monitoring, treatment, prevention of disease or alleviation of handicap in humans or animals, including related research performed under the supervision of a medical practitioner or veterinary surgeon.

The health risk waste treatment process proposed is Continuous Steam Auger Disinfection where the waste is subjected to high temperature steam that “effectively kills or inactivates pathogens, including bacteria, viruses, spores, rendering the waste non-infectious and safe for thermal treatment by waste to energy” (pg 6 of NTS)

The modification proposed is justified, as described in the NTS, as due to an upward trend in health risk waste production in Ireland due to several factors listed, and to add a second supplier of health risk management waste services in Ireland. One factor listed is “enhanced hygiene practices and the increased use of single use Personal Protective Equipment (PPE) such as gloves, wipes and aprons” (NTS pg 4).

In the context of an economy striving to be circular economy under the Circular Economy and Miscellaneous Provisions Act 2022 this specific factor is questionable. One might reasonably expect the use of single use PPE to decline and not increase.

The Environmental Health Service (EHS) is satisfied that the EIAR provides an adequate description of the proposed project.

2. Assessment of Public Consultation and the Non-Technical Summary (NTS)

Chapter 6 of the full EIAR report addresses the issue of consultation including public consultation. It states that “public participation is essential to ensure transparent and robust decision making”(pg 63 of the full EIAR). It was noted that a project website exists with a range of documentation available and a route for the public to make contact via a messaging section on the project website. It was also noted that there was to be a public notice in a newspaper circulating in the locality prior to making an application to An Bord Pleanala.



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375

Fax: (01) 4686344

No reference could be found for the public to participate and engage in consultation other than via the website. No phone number to contact or address to write to or person's name to contact could be found under this section. This potentially limits engagement and potentially excludes certain groups, including the occupiers of other commercial premises in the vicinity from participating in the planning process.

The EHS is satisfied that the Non-Technical Summary accompanying the full EIAR provides an adequate description of the proposed development and the potential impacts on human health.

The National Environmental Health Service (NEHS) recommends an enhanced process of public consultation is employed to ensure the views and opinions of all who may be affected by the proposed development is captured for all phases of the proposed development, construction, operations and decommissioning. It is recommended that a Community Liaison Officer or other designated person is appointed to act as a focal point for community feedback or complaints with regard to the proposed development and that the channels to provide that feedback are broadened to include phone calls and written communication outside of emails.

Issues of most relevance to population health are likely to include Noise, Air Quality (including odours), Climate and Water Discharges.

4. Assessment of Description of the Physical Environment

The site is described in the NTS as covering an area of 1.1 hectares covered extensively in hard stand concrete and buildings. It is bounded to the north by the Griffeen River, to the south by Grants Drive and to the east and west by other commercial buildings.

The development has three distinct phases

- Construction phase – 18 weeks to modify buildings 1 and 3
- Operational Phase – Undetermined
- Decommissioning Phase – 8 weeks

The following addresses some of the issues of relevance to population health

Population and Human Health

Table 6.6 Human Health Assessment Environmental Commitments in the NTS (pg 31 of the NTS) identifies a number of potential human health impacts in all three phases of the proposed development (3 in Construction, 4 in Operations and 1 in the Decommissioning Phase). The section concludes that “any potential human health effects associated with the construction, operational and decommissioning phase of the Proposed Development would be minor and not significant” It goes on to state that “no additional mitigation measures are proposed for the specific protection of human health”. (pg 31 of the NTS)



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

The issues covered in the following submission address

- Chapter 9 – Noise and Vibration
- Chapter 10 – Air Quality and Climate
- Chapter 15 - Water

Climate Change is widely regarded as the greatest threat to global health in the 21st century and is therefore included in the context of protecting human health.

The NEHS recommends that climate change is included when assessing the potential impact of the proposed development on human health (local, global, positive and negative impacts).

Noise and Vibration

Chapter 9 of the full EIAR addresses the issue of Noise and Vibration for each phase of the development with a focus on the Construction and Operational Phases. Four parameters are assessed, two in relation to noise and vibration during the construction phase, noise during operations and noise from increased traffic during operations. Background noise levels were measured at two Noise Sensitive Locations outside the current facility and at four locations within the site of the proposed development. Three other locations were chosen for spot measurements, two within the site boundary and one outside. In addition noise predictions have been undertaken for the proposed development in each of the three phases.

Section 9.7 on page 9-21 sets out Mitigation Measures for each of the three phases of the development. It states no significant impacts were identified at Noise Sensitive Locations (NSLs) under each of the three phases of the proposed development. However, a number of mitigation measures under the construction and operational phases in particular are listed to be implemented as part of Best Practice Means (BPM).

The NEHS recommends the listed mitigation measures described under 9.7.1, 9.7.2 and 9.7.3 are implemented

Air Quality (including Dust) and Climate

Chapter 10 of the full EIAR deals with the issues of air quality and climate which are split into sub-groups below.

Air Quality

The Non-Technical Summary (NTS) under section 6.5 describes the main existing sources of pollution as road traffic, air traffic from Casement aerodrome and from other surrounding businesses within the business park and surrounding agriculture. Perhaps surprisingly residential homes in the locality are not mentioned as potential sources of pollution.



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

Construction Phase: In the context of the proposed development the key risk identified for potential sensitive receptors is the generation of dust during the construction phase though it appears people working in other commercial units within the business park are not included in assessing who are potential sensitive receptors.

Operational Phase: Operationally, reference is made to potential air quality impacts regarding odour and potential pathogenic bio aerosols where it is stated significant air quality control measures will be put in place including an odour management plan.

The NEHS recommends that a Dust Risk Assessment is undertaken to include nearby commercial properties where one might reasonably expect to find human receptors. The Dust Mitigation measures listed under 10.7.1.1 should be adopted as minimum conditions of planning but amended once the potential impact on sensitive receptors in other commercial properties has been assessed.

The NEHS recommends that the mitigation measures set out under the Operational Phase 10.7.2 on the issue of traffic management, odour and bio-aerosols are set as minimum conditions of planning including an Odour Management Plan.

Climate Change

The EIAR recognises the cumulative effect of Green-House Gas (GHG) emissions, as such emissions have a transboundary effect. Therefore, every tonne of GHGs counts in protecting public health locally and globally. Every effort should therefore be made to deliver on the objective for Ireland to transition to a low-carbon, climate-resilient, and environmentally sustainable economy by 2050 as set out in the Climate Action and Low Carbon Development Act 2015.

Construction Phase: In the context of Climate Change reference is made to key sources of Green-House Gas emissions during the construction phase and they are listed as (a) embodied emission in site materials, (b) direct emissions from plant machinery/equipment and (c) transport emissions from vehicles importing/exporting material to and from the development site.

Operational Phase: Operationally in the context of GHG emissions sources referred to are from energy use on site and the transport of materials. Reference to staff journeys to and from the site did not appear to be mentioned.

The overall conclusion drawn from the assessment in these two areas is that the proposed development is not predicted to have a significant effect on air quality but there will be a slight adverse effect on climate as a result of the emissions of GHGs. (pg 25 of the NTS)

There is some reference to Climate Change Adaptation under 10.4.2.6 on pg 10-25 of the full EIAR, where reference is made to the risk of major disasters with specific reference to flooding risk. Outside of a flood risk assessment there is no evidence of a climate change risk assessment having



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375

Fax: (01) 4686344

been conducted to not only examine the risk of major disasters but how the facility should adapt to climate breakdown more generally.

The NEHS recommends a more expansive list of measures to be undertaken to curb Green House Gas Emissions in the proposed development beyond those listed under 10.7.2.4 of the EIAR. Potential areas to include, the “green” procurement of building materials, the generation of renewable energy on site via PV solar panels for example, the harvesting of rainwater to limit dependence on public supplies and support for staff to reduce their own emissions in getting to and from work by providing secure bicycle parking, EV charge points etc.) and the use of low emission vehicles to transport materials to and from the site. In the construction phase the use of low emission vehicles and machinery is an option in addition to the “green” procurement of materials.

The NEHS recommends that a comprehensive Climate Change Risk Assessment (CCRA) is undertaken for a range of potential hazards including heat and drought, and from that to develop Resilience mechanisms that deals with all hazards. For example the provision of shade (natural or artificial) may need to be incorporated into the proposed development’s design.

The NEHS recommends that the proposed development seek opportunities to protect and enhance population health by for example better enabling staff utilise active travel or public transport to get to and from work.

Water

Chapter 15 of the EIAR addresses the issue of water assessing the likely significant effects on water quality, flooding, hydrology and drainage issues. More specifically the parameters for assessment address (a) Surface Water Quality, (b) Drinking Water Resources, (c) Flood Risk and Fluvial Geomorphology. Issues related to water demand or water quantity needed for the site to operate was not found in this chapter.

Flood risk is stated to have been scoped out of the assessment on the basis that the site is located in flood zone C with a low risk of flooding and the EIAR states that there “is no known water abstraction infrastructure in the vicinity of, or downstream of the site” (pg 15-14 of the full EIAR)

The EIAR indicates that “wastewater from the proposed activities will arise from the following and will be discharged into sewer.

- The HRW management process:
- Washing of bins (will contain a biodegradable detergent used to decontaminate the bins); and
- From management of condensate.

Steam treatment will neutralise infectious liquids within the proposed HRW treatment plant prior to discharge into the foul water network where it will combine with the treated output from the



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375
Fax: (01) 4686344

existing bulk liquid waste treatment facility in Building 2 on-site. Water quality of wastewater discharge from the site is routinely checked and sampled for BOD, COD, pH, suspended solids in accordance with the EPA IED license.” (pg 15-14 of the full EIAR).

It is not indicated if additional parameters will require monitoring based upon the changed nature of the waste being managed at the proposed development.

The NEHS recommends there is an assessment of water demand at the proposed development and that opportunities to reduce demand on public water supplies are explored in the context of a circular economy and in the context of adapting to climate change as referenced elsewhere in this submission.

The NEHS recommends a reassessment of the parameters to be monitored at the wastewater discharge other than those currently listed. The nature of the Health Risk Waste being treated may determine a different order of monitoring based upon a more detailed understanding of the waste being received and treated at the proposed facility. For example will there be a need to monitor discharges for the presence of pharmaceuticals?

Conclusions

Should permission be granted for the proposed development, the National Environmental Health Service makes the following recommendations:

- **That an enhanced process of public consultation is employed to ensure the views and opinions of all who may be affected by the proposed development is captured. To facilitate this a dedicated Community Liaison Officer could be appointed and channels to provide feedback include telephone and postal communication routes.**
- **That climate change is included when assessing the potential impact of the proposed development on human health (local, global, positive and negative impacts).**
- **That the listed mitigation measures with respect to Noise and Vibration described under 9.7.1, 9.7.2 and 9.7.3 are implemented**
- **That a Dust Risk Assessment is undertaken to include nearby commercial properties and the Dust Mitigation measures listed under 10.7.1.1 should be adopted as minimum conditions of planning but amended once the potential impact on sensitive receptors in other commercial properties has been assessed.**
- **That the mitigation measures set out under the Operational Phase 10.7.2 on the issue of traffic management, odour and bio-aerosols are set as minimum conditions of planning including an Odour Management Plan.**
- **That a more expansive list of measures be undertaken to curb Green House Gas Emissions in the proposed development beyond those listed under 10.7.2.4 of the EIAR. Potential areas to include are, the “green” procurement of building materials, the generation of renewable energy on site via PV solar panels for example, the harvesting of rainwater to**



National Environmental Health Department
4th Floor Chamber House,
Chamber Square,
Tallaght,
Dublin 24

Tel: (01) 4686375

Fax: (01) 4686344

limit dependence on public supplies and support for staff to reduce their own emissions in getting to and from work by providing secure bicycle parking, EV charge points etc.) and the use of low emission vehicles to transport materials to and from the site. In the construction phase the use of low emission vehicles and machinery is an option in addition to the "green" procurement of materials.

- That a comprehensive Climate Change Risk Assessment (CCRA) is undertaken for a range of potential hazards including heat and drought, and from that to develop resilience mechanisms that deals with all hazards. For example the provision of shade (natural or artificial) may need to be incorporated into the proposed development's design.
- That the proposed development seek opportunities to protect and enhance population health by for example better enabling staff utilise active travel or public transport to get to and from work.
- That there is an assessment of water demand at the proposed development and that opportunities to reduce demand on public water supplies are explored in the context of a circular economy and in the context of adapting to climate change as referenced elsewhere in this submission.
- That there is a reassessment of the parameters to be monitored at the wastewater discharge other than those currently listed. The nature of the Health Risk Waste being treated may determine a different order of monitoring based upon a more detailed understanding of the waste being received and treated at the proposed facility. For example will there be a need to monitor discharges for the presence of pharmaceuticals?

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)