



Panther Environmental Solutions Ltd
Units 3 & 4, Innovation Centre
Institute of Technology
Green Road, Carlow, Ireland
R93 W248

Telephone: 059-9134222

Email: info@pantherwms.com
Website: www.pantherwms.com

03rd February 2022

Meath County Council,
Buvinda House, Dublin Road
Navan, County Meath
C15 Y291

Meath Co. Co. Reference: 21-424

RE: *"The development consists of the construction of an extension to an existing wastewater treatment plant (WWTP) where the works include:-*

a) Demolition of an existing storage building (17.50m²) and construction of a new single-storey industrial type building to enclose the DAF unit granted planning permission under planning reference LB180300 and to provide new enclosed storage and control rooms (total floor area 119m²).

b) Install a new sludge press at intake to WWTP, change aeration tank to anoxic tank, install 2 no. additional aeration tanks, alteration to perimeter berm to increase the footprint of WWTP, by 539m² to that granted planning permission under planning permission LB180300.

c) Treated wastewater rising main from the site of the proposed development to new discharge point at the River Boyne (distance 7.2km), where pipeline shall be laid along a section of Windmill Road, the L1013, Yellow Furze Road, the L1600 (Boyne Road), and the unnamed local road leading from the L1600 to the private lands abutting the River Boyne at the discharge point."

Subject: Response to Submission by HSE

A Chara,

Panther Environmental Solutions Ltd, acting as consultants for Dawn Meats Ireland (Slane), would like to submit the following response to the submission made by the Health Service Executive.

The following section provides excerpts of the submission and responses.

If you have any queries regarding the above, please do not hesitate to get in contact.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Martin O'Looney', with a stylized flourish at the end.

Martin O'Looney
Panther Environmental Solutions Ltd
Units 3 & 4, Innovation Centre
Institute of Technology
Carlow, Ireland
R93 W248
Tel: +00353 (0)59-9134222
Email: martin@pantherwms.com

Conclusions

1. The proposed WWTP has been designed for a maximum capacity of 400m³/day, with an initial expected maximum operating volume of 220m³/day. Clarification should be provided on the reasoning for the additional capacity and if there is a planned expansion of activities.

Dawn Meats Ireland are investigating options to increase production at the Dawn Meats (Slane) site in order to maximise the return on investment from this facility within the group.

It should be noted that, should the Dawn Meats (Slane) facility wish to increase production in the future, consents and revised licences would be required, where applicable, from the Department of Agriculture, the EPA and the Planning Authority.

In all phases, the Dawn Meats (Slane) facility would be required to comply with all planning conditions and revised licence conditions for the protection of human health and the environment.

The proposed WWTP design has been developed in consideration of the potential implementation of plans for future expansion of the site.

2. When considering alternative processes as part of the EIA only treatment and discharge options were considered by the applicant. There is a clear requirement in EIA to consider alternatives which should include alternative technologies involving reuse or reprocessing of waste-water.

Dawn (Slane) are exploring the option of treating final effluent to a potable water standard for partial or total reuse of final treated effluent within the factory. It is anticipated that this potential future development would require a new industrial type building in order to house a reverse osmosis (RO) system, new UV filtration system and chlorine dosing system. Two additional tanks would also be provided, a 25m³ effluent buffer/feed tank and 25m³ potable water tank.

This system would have the potential to reduce treatment costs for abstracted groundwater, reduce water usage within the factory and reduce effluent discharge rates to the River Boyne.

The investigation of the reuse of treated final effluent is under review between Dawn (Slane) and relevant agencies. This review was not deemed by Dawn Meats Ireland to be at a sufficient stage of progression to be included in the current planning application. Should this option be progressed in the future, a further planning application to Meath County Council would be required to install the required structures and plant.

Attachment 2.4 if the EIAR provides a concept drawing of a potential future development of the effluent treatment plant at the Dawn (Slane) facility. This development does not form a part of the proposed development in this current planning application.

3. The Environmental Health Service could not locate any record of consultation regarding the proposed development being carried out with local residents. As demonstrated by the 3rd Party submissions, there are significant concerns within the local community with regards to the proposed development. The Environmental Health Service recommends that meaningful public consultation should be carried out with regards to this proposal. Any concerns the public may have in relation to the operation of this development should be addressed by the applicant and assessed as part of the EIA process.

Dawn Meats Ireland have endeavoured to respond to the concerns of third parties and local interest groups as outlined in submissions on this application.

The proposed effluent treatment plant design has been amended to improve the robustness of the system for ensuring that the proposed final effluent treatment parameters are achieved. In order to improve proposed treatment standards for the protection of fisheries, drinking water abstraction and recreational use of the River Boyne, the proposed development also includes a new MBR and UV filter which will achieve effective removal rates of micro-organisms and viruses.

Further detail has also been provided with regard to the proposed development design, construction methods, mitigation and procedures, and operational infrastructural and managerial controls and contingency measures.

However, Dawn Meats Ireland would be open to further public consultation should this be required by the Planning Authority.

4. Modelling has predicted noise construction activities at the proposed pipeline would be 24 to 36 dBA above the existing background noise level at noise sensitive locations, as shown in table 6.13 and figure 6.2. It is recommended that a specific construction noise management plan is agreed with Meath County Council to mitigate excessive noise prior to the commencement of construction works. The specific recommendations for the use of noise barriers along with the use of acoustic screens and huts should be implemented. The applicant should consider implementing a community liaison process for dealing with the concerns of the impacted community. Noise monitoring of construction works should also be considered.

Construction noise control recommendations have been made within the EIAR document, Noise Impact Assessment Report (Attachment 6.1 of the EIAR) and the Outline Construction & Environmental Management Plan (RFI Attachment 3.2). The recommendations include, limiting of construction times, use of noise barriers during critical periods and implementing a construction noise monitoring plan.

5. As outlined on Figure 9.3 of the EIAR the quality of water in the River Boyne in the vicinity of the proposed discharge has been unable to maintain the good status it achieved in 2012 A. The water quality framework requires all Member States to protect and improve water quality in all waters so that they achieve good ecological status by 2015 or, at the latest, by 2027. It is recommended that an evaluation of the significance of the impact the proposed

discharge from the Dawn Meats (Slane) facility will have in the context of achieving the target of improving water quality for the River Boyne under the water framework directive is carried out.

A revised Assimilative Capacity Report (Attachment 8.6 of the EIAR) and new Mixing Zone Model Report (Attachment 8.5 of the EIAR) have been included in response to RFI.

It is noted that the proposed final effluent treatment standards would also be subject to review and alteration during the Industrial Emissions licence revision process by the EPA, in consultation with relevant prescribed bodies.

6. An assessment of the significance of the impact that predicted reduced river flows as a result of climate change will have on the capacity of the River Boyne to safely assimilate the proposed discharge from the facility should be carried out.

Please see the Mixing Zone Model Report (Attachment 8.5 of the EIAR) which includes an assessment on the potential impact of climate change on river flows.

7. The planning application should be assessed to ensure compliance with the requirements of the Meath County Development Plan and in particular the strategic objectives for development of the area for recreational use and for promoting health through physical exercise and access to green areas. The significance of the impact the proposed effluent discharge will have on the overall context of the planned recreational development of the Boyne Valley Area should also be assessed. This assessment should be made within the context of the contents of 3rd Party submissions that identify local recreational use of the river and surrounding area.

The EIAR includes assessments of potential impacts to human health, amenity and recreational activities, as applicable. Revisions to the EIAR have included alterations to the proposal design, further detail on the proposal design, further assessment on the potential impact water quality and ecology and further assessment of landscape and visual impacts.