

Daragh Cassells

Daire

From: Bord
Sent: Thursday 15 August 2024 15:48
To: Appeals2
Subject: FW: National EHS observations Sub Consent 308036 Ummera Gravel Pit Co. Cork
Attachments: National EHS Observations on ABP308036-20 Sub Consent.pdf

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Thursday, August 15, 2024 3:29 PM
To: Bord <bord@pleanala.ie>
Subject: National EHS observations Sub Consent 308036 Ummera Gravel Pit Co. Cork

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Please find observations by the National Environmental Health Service on sub consent application 308036-20 – Ummera Gravel Pit, Co. Cork.

Notification to HSE was made dated 19th July 2024 with return before 5.30pm 15-8-24. No fee payable.

If any clarification is required it should be made to Andrew.sulley@hse.ie

Regards,


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Senior Environmental Health Officer

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"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.

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An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Milaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

12th August 2024

Ref: 308036-20

An Bord Pleanála
64 Marlborough Street
Dublin 1

UMMERA GRAVEL PIT MACROOM, COUNTY CORK – application for substitute consent

Reference is made to the above application and notification by ABP to the HSE dated 19th July 2024.



Clarification on the content of this submission should be made to: Andrew.sulley@hse.ie

The following are the observations of the National Environmental Health Service (NEHS):

General Comments

- a) The NEHS has no record of any on-going complaints or public or environmental health notifications with regard to the operation of the facility.
- b) The NEHS is not aware of the provision of any health services that might be considered particularly sensitive receptors in the vicinity of the site.
- c) As the facility is operating, the NEHS is of the opinion that the most pertinent aspect of the remedial EIA is the measurement and monitoring of actual emissions into the environment, and not predictive methodology as per a standard EIA.
- d) Based on the above opinion, the NEHS has considered the existing emissions, and any future emissions, to the environment and the mitigation/control measures being implemented and continued to be implemented if consent is given.
- e) The existing emissions and any future emissions, if consent is given, have been considered against health protection standards and current Environmental Guidance in the extraction industry.
- f) The NEHS has considered the report and recommendations by Cork County Council within a Public and Environmental Health remit.

Consideration of the Schedule of Environmental Controls and the Remedial EIAR

Reference is made to the schedule of Environmental Controls in section 4 Rev (3) dated 1-1-2020 and updated titled Environmental Management System and dated January 2020. Generally, the NEHS considers these to be too generic. These should be updated with specific actions for the site and development. To include the management and responsibilities of the system.

Section 5 rEIAR – Noise

Table 5.2 details 'residual' noise data. This is the existing noise environment. It's not clear whether this is a 'Residual' noise impact, i.e. after noise mitigation is in place, or the background noise without the facility operating. The chapter does not clearly show the change in the noise environment by operation of the facility, even if the change is not then considered significant, which is the main purpose of rEIA. A comparison against an absolute noise level criteria is only part of the assessment as to the effects operation of the facility has had over the operating period with regards to noise.

The NEHS could not find an assessment of the change in the noise environment as a result of the movement of HGVs which are a consequence of the facility operating.

Environmental Controls Section 4.1 – noise

The proposed emission standards detailed in this section would be considered adequate protection of Public and Environmental health for a proposed development of this nature brought into the planning process now. The evidence provided in the rEIAR is that this noise criteria has been met during the lifetime of the facility but the rEIA does not assess the change in the noise environment as a result of the development operating without the correct consent.

The NEHS would recommend that if consent is given to continue operation of the facility the standard operating hours are conditioned to between 8.00am to 20.00 pm Monday to Friday and 8.00am to 14.00pm Saturday, with no activity Sunday or Public Holidays. Work only in exceptional situations outside these hours.

Noise monitoring should be annually to ensure compliance with the health protection standard.

A complaint system should be in place that records any noise complaints received and any corrective action and verifies the effectiveness of the corrective action.

These recommendations are made in the interest of the protection of Public Health.

Environmental Controls Section 4.2 – Emissions to Air

The dust emission standard is considered detailed in this section is considered the Industry standard for preventing nuisance. As it is an averaging standard over a 30 day period it can include short periods of very high dust deposition that is average out to comply with the standard.

It is therefore important that if consent is given for continued operation of the facility:

- a) The mitigation identified in the rEIAR and the Environmental Management Systems is implemented in full, irrespective of the average dust monitoring results,
- b) There is a complaint system that records any complaints with regard to dust, any corrective action taken and the effectiveness of the corrective action,
- c) Dust monitoring should be continual and not limited to twice per annum,

These recommendations are made in the interest of the protection of Public Health

Section 7 rEIAR – Hydrology and Surface Water

It is noted in rEIAR and the FI clarification 14 to 16 that there are no direct discharges from the settlement ponds but there are surface water discharge to Clashavoon stream.

The NEHS notes that some sampling results have indicated elevated levels of suspended solids in the stream. Neither the rEIAR nor section 4.7 of the Environmental Management System provides details on how this will be addressed in consent is given for continued operation of the facility.

There does not seem to be an assessment of the likely significant impacts of extraction from the Clashavoon Stream included in the rEIAR.

Any future consent for the facility must ensure that all chemicals and hydrocarbons are stored in bunded areas and refilling, maintenance and washing of machinery is only done on hard standing areas with any run off trapped through a class 1 Oil interceptor.

Consideration of the Submission by Cork County Council on Conditioning any Consent

The NEHS has considered the submission by Cork County Council within the remit of the Protection of Public and Environmental Health and makes the following observations:

- a) Population and human health – the NEHS would concur with the comments made on page 15 with regard to noise, dust and air quality
- b) Surface water, ground water and water quality – the NEHS would concur with the comments made on page 16 and 17 with regard to the protection of ground and surface water.

The NEHS would also concur with the recommendation for conditioning of any consent item 4, items 7 and 8 (which are Public Health measures not just an amenity issue), item 10 and 11, Items 12 to 15 and Item 19.

These are, in the opinion of the NEHS, important health protection measures that should be incorporated into the development consent process.


Andrew Sulley
Senior Environmental Health Officer

