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Comhairle Contae
Átha Cliath Theas
South Dublin County Council

Date: 01-Aug-2022

Register Reference: SD22A/0303

Development: Construction of a Volatile Organic Compound (VOC) Abatement system comprising of a thermal oxidiser (TO), associated plant equipment and scrubbers positioned on a bunded concrete plinth with a maximum single stack height of 12m along with two access platforms at 2.5 high and 5.0m high used for maintenance only; The system is set within a 489sq.m (including a bunded area of 213sq.m) concrete compound enclosed by a 2.4m high paladin weldmesh black fence to match the existing utilities perimeter fence; 135sq.m single storey utilities workshop will sit adjacent to the Volatile Organic Compound (VOC) abatement system compound with associated hardstanding area and soakpit; 55m (L) x 3.2m (W) x 5.6m (H) pipe rack extension with the addition of a second tier extension 118.6m (L) X 3.2M (W) 1.2m (H) to the existing pipe rack is required to service the new VOC abatement system compound; a contractor's compound 3,420sq.m comprising single stacked portacabins, workshops, parking for 30 contractors, materials delivery and set down area; the compound will be enclosed by a 2.4m tall paladin weldmesh black fence; modifications to the existing internal access road will include the addition of a new access road and footpath around the VOC abatement system compound and utilities workshop; a permanent pedestrian crossing including associated signage at the existing access road giving access between the contractor's compound and the voe abatement system compound; modifications to the existing site lighting, signage, surface water, foul and process wastewater drainage, hard and soft landscaping including a 3m high planted berm to the north of the contractor's compound; An EIAR (Environmental Impact Assessment Report) will be submitted with the application; this application relates to development which comprises an activity requiring an Industrial Emissions Licence in accordance with the First Schedule of the EPA Act 1922 as amended.

Location: Grange Castle Business Park, Grange Castle, Dublin 22

Applicant: Takeda Ireland Limited

App. Type: Permission

Planning Officer: CAITLIN O'SHEA

Date Received: 14-Jul-2022

Decision Due Date: 07-Sep-2022

Introduction
The Environmental Health Department was notified of the consultation request for this application on 08 August 2022.

This submission only comments on Environmental Health impacts of noise, pest control and air quality following review of Chapters 5, 9, and 10 of the EIAR as submitted as part of this planning application.

Environmental Health Submission

Description of the project:
The proposed development consists of the construction of a Volatile Organic Compound (VOC) Abatement system comprising of a thermal oxidiser (TO), associated plant equipment and scrubbers positioned on a bunded concrete plinth with a maximum single stack height of 12m along with two access platforms at 2.5 high and 5.0m high used for maintenance only; The system is set within a 489sq.m (including a bunded area of 213sq.m) concrete compound enclosed by a 2.4m high paladin weldmesh black fence to match the existing utilities perimeter fence; 135sq.m single storey utilities workshop will sit adjacent to the Volatile Organic Compound (VOC) abatement system compound with associated hardstanding area and soakpit; 55m (L) x 3.2m (W) x 5.6m (H) pipe rack extension with the addition of a second tier extension 118.6m (L) X 3.2M (W) 1.2m (H) to the existing pipe rack is required to service the new VOC abatement system compound; a contractor's compound 3,420sq.m comprising single stacked portacabins, workshops, parking for 30 contractors, materials delivery and set down area; the compound will be enclosed by a 2.4m tall paladin weldmesh black fence; modifications to the existing internal access road will include the addition of a new access road and footpath around the VOC abatement system compound and utilities workshop; a permanent pedestrian crossing including associated signage at the existing access road giving access between the contractor's compound and the voe abatement system compound; modifications to the existing site lighting, signage, surface water, foul and process wastewater drainage, hard and soft landscaping including a 3m high planted berm.

Site Location:
The site location is within the Takeda Ireland site located within the Grangecastle Business Park, Nangor Roiad, Clondalkin, Dublin 22. The site is described in detail under chapter 2.2.1 of the EIAR submitted as part of this planning applcation.

Chapter 10 – Noise and Vibration
The EHS reviewed Chapter 10 and the included assessment carried out on the potential impacts of noise and vibration associated with the proposed development.

This chapter of the EIAR was written by Diarmuid Keaney who we believe to be a suitably qualified person.

The information provided details that the proposed development will not result in any likely significant effects in relation to noise. Where there are risks of noise both during the construction phase and the operational phase the chapter details a number of mitigation measures to be used to ensure that any effects are negligible and imperceptible.

The EIAR chapter 10 details that cumulative noise impacts from a number of facilities in the area will mean a 2dB increase in nighttime noise levels which is determined to be not significant.

Chapter 9 - Air Quality and Climate Change

The EHS reviewed the air quality and climate change chapter and included assessments carried out. This chapter was completed by AWN Consulting Limited and contained a number of modelling scenarios in relation to the proposed development and various potential pollutants in addition to cumulative impacts with other facilities in close proximity to this proposed development.

Information is provided which details that the impacts associated with the proposed development will be negative, temporary, short term and in some cases long term and imperceptible in nature. Where there are risks to air quality and climate change identified both during the construction phase and the operational phase mitigation measures are outlined in the EIAR which the developers must undertake to ensure that any effects are negligible and imperceptible. The EIAR details that cumulative impacts from a number of facilities in the area will indicate that ground level concentrations are below the relevant air quality standards for NO_X. The cumulative impact is described as negative, long term and imperceptible.

The above proposal is acceptable to the Environmental Health Officers subject to the following conditions:

Noise

1. The applicant shall adhere to the noise and vibration monitoring and mitigation measures outlined in the EIAR (section 10) submitted as part of this planning permission request. This includes the detailed mitigation measures for both the construction phase and the operational phase of the development.

2. No equipment or machinery (to include pneumatic drills, construction vehicles, generators, etc) shall be operated on or adjacent to the construction site before 07:00 hours on weekdays and 09:00 hours on Saturdays nor after 19:00 hours on weekdays and 13:00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.

3. Where intrusive machinery is required to be used at short notice, the main contractor shall ensure that nearby sensitive locations are informed prior to works commencing.

4. Noise due to the normal operation of the proposed development, expressed as Laeq over 15 minutes at the façade of a noise sensitive location, shall not exceed the daytime background level by more than 10 dB(A) and shall not exceed the background

level for evening and night time. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.

5. The applicant shall ensure that the design of the noise sources at the facility and the associated abatement measures will ensure that tonal or nuisance noise will not arise at the Noise Sensitive Locations NSLs due to the facility operation.

6. The applicant shall put in place management procedures and a maintenance program for the external plant. All mechanical plant items such as motors, pumps, etc shall be regularly maintained to ensure that excessive noise generated by any worn or rattling components is minimised.

Air

7. The applicant shall adhere to the remedial or reductive measures outlined in the EIAR (section 09 Air Quality and Climate Change) submitted as part of this planning permission request. This includes the detailed mitigation measures for both the construction phase and the operational phase of the development.

8. The development shall be so operated that there will be no emissions of malodours, gas, dust, fumes or other deleterious materials, on site as would give reasonable cause for annoyance to any person in any residence, adjoining premises or public place in the vicinity

Drainage

9. Any connections to the main sewer must be connected so as not to give rise to a public health nuisance.

Pest Control

10. The applicant shall put in place a pest control contract for the site for the duration of the construction works.

Refuse

11. A suitable location for the storage of refuse shall be provided during the construction and operational phase of the development so as to prevent a public health nuisance.

Fiona Byrne
Senior Environmental Health Officer