

**From:** Shay Knox  
**Sent:** 25 March 2009 15:06  
**To:** Licensing Staff  
**Subject:** FW: New submission entered for Reg no: W0214-02. (Reference Number: W0214-02-090325024607)

**Importance:** High

**Attachments:** Comments on Review of WL 0214-01 (3).doc

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**From:** Kenneth O' Riordan [mailto:kenneth.oriordan@corkcoco.ie]  
**Sent:** 25 March 2009 14:46  
**Subject:** New submission entered for Reg no: W0214-02. (Reference Number: W0214-02-090325024607)  
**Importance:** High

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**Comments on EIS prepared  
by  
Glenside Environmental Services  
for application by  
Ted O'Donoghue & Sons  
to increase capacity of licenced facility (W0214-01)  
at  
Knockpoge, Waterfall, Co. Cork**

**BACKGROUND:**

Ted O' Donoghue and Sons Ltd is seeking a review of their Waste Licence WL0214-01 from the EPA.

The application for the review of the Waste Licence is to seek approval from the EPA for the following:

1. Increase annual tonnage from current licenced figure of 23,000 tonnes to 60,000 tonnes per annum.
2. Use of the facility as a Civic Amenity Centre to cater for the needs of private vehicles

**EXISTING AND PROPOSED WASTE TYPES & QUANTITIES**

Waste Type	2007 Permitted Acceptance (t)	Proposed Acceptance (t)
Household	12,880	30,000
Commercial	1,840	6,600
C & D	7,514	19,602
Industrial non-hazardous solids	766	3,798
<b>Total</b>	<b>23,000</b>	<b>60,000</b>

- 2007: 31,027t accepted at facility

**PROCESSES**

- It is not proposed to construct any new infrastructure.
- The application relates solely to a proposed increase in the tonnage accepted at the facility and the use of the facility as a Civic Amenity.
- Current Processes:
  - manual separation of large wastes
  - timber and green waste shredded on site
  - cardboard and plastic baled on site
  - trommel screen and a 360' excavator
  - picking station downstream of trommel
  - magnet for removing metal
  - blowing process to remove paper and plastic

**HOURS OF OPERATION**

- Current: Monday to Friday 06:00 to 20:00  
Saturday 06:00 to 17:00
- Proposed: Monday to Friday 06:00 to 20:00  
Saturday 06:00 to 13:00

### GENERAL COMMENTS REGARDING THE CONTENT OF THE EIS

- Licence no. cited is W0147-01 which is for Ashgrove Ltd. Licence no. for Ted O'Donoghue & Sons is W0214-01.
- Section 6.4.2 Climate  
Potential recharge is of no consequence but the run-off from the impermeable surfaces is (related to Section 6.8 Water Management).
- Section 6.4.3 Local Quaternary and Bedrock Geology:  
Its depth to bedrock/thickness of unsaturated soil/subsoil that is of relevance with respect to groundwater protection rather than description of local quaternary and bedrock geology.
- Section 6.5 Surface Water - Hydrology  
The discharge of run-off to a drainage ditch which in turn discharges to a first-order stream which forms part of the headwaters of the Curraheen River is of concern with respect to contamination. The EIS does not contain any data on effluent quality and only contains data from 1 no. result of water quality analysis from an upstream sample point which does nothing to alleviate this concern. The EIS also notes elevated levels of nutrients in both groundwater and surface water.

### Submission by the Area Engineer Ballincollig:

The facility in question is a waste transfer station located at Knockpogue, Waterfall. The existing facility is licensed to receive 23,000 tonnes of waste annually. The owners have requested that this licence be reviewed to accommodate up to 60,000 tonnes of waste per annum.

The Area Engineers Office, Ballincollig have serious concerns regarding this proposal. The facility is located on county road in a predominantly rural area. The existing road network in the vicinity is not suitable for the volume of HGV's and smaller vehicles delivering waste to this facility. Roads in the area, in particular the L-6279 on which the site is located, have been seriously damaged by the current level of HGV traffic to the facility. Road verges have been eroded and road drainage damaged leading to potholing and breaking up of the surface. In addition the increasing number of HGV's and delivery vehicles visiting this site via narrow country roads is giving rise to a traffic hazard for other road users and in particular pedestrians.

The licence review seeks a threefold increase in the quantity of material to be received at the facility, this will result in a similar scale increase in traffic entering and exiting the site. The rural county roads in this vicinity are not suitable for such a large scale waste transfer facility and the HGV traffic associated with it. To permit any increase in capacity at the site would lead to further serious damage being caused to the public road and result in an increased hazard to other road users in the area.

### Recommendations:

Cork County Council has concerns regarding the proposed increase in capacity sought by Ted O' Donoghue and Sons Ltd in seeking a review of waste licence WL0214-01 from the EPA for the following reason:

The rural county roads in the vicinity of the site at Knockpogue, Waterfall are not suitable for the proposed large scale waste transfer facility and the HGV traffic associated with it. To permit any increase in capacity at the site would lead to further serious damage being caused to the public road and result in an increased hazard to other road users in the area.