

Feidhmeannacht na Seirbhíse Sláinte Health Service Executive



HSE South, Community Care Centre, Western Road, Clonmel, Co. Tipperary, Ireland.

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Ms. Marie Harris
Programme Officer
Office of Climate, Licensing, & Resource Use
Headquarters, PO Box 3000
Johnstown Castle Estate
Co. Wexford

My ref. EH 10/91. Your ref. W0276-01 Please ask for Mr. R. Parle Tel: 052 6177292.

Date: 22nd October 2010.

Dear Ms. Harris,

Re: Proposed Waste Licensing Activity at DOK Quarrystone Limited, Garranmore, Cashel, Co, Tipperary.

Waste Management (Licensing)Regulations 2004
Waste License application ref: W 0276-01).

I refer to your correspondence dated the 10th of August 2010 concerning the above matter the contents of which have been noted. I have since had an opportunity to visit the site of the proposed activity and look at the waste licence application and therefore should like to make the following comments and recommendations. The proposed activity/ development falls outside the jurisdiction of this department from a health and safety, pollution control point of view. It is therefore imperative that the application also be referred to other relevant agencies such as The Health & Safety Authority, the County Council in order that they can make their respective comments/observations. It will also be necessary to consult with local residents and communities as they may be affected directly or indirectly by the proposed activity.

The protection of public health, safety and the environment is of the utmost importance when selecting a suitable site for waste disposal. Although engineering can offset many of the problems relating to waste disposal activity the proposed site's natural characteristics will determine its appropriateness with respect to impacts on the local environment. The site must be assessed with respect to the types of waste which are intended to be deposited as part of the waste activity, and the after use of the site must also be considered and any constraints on after use. In this particular instance it is proposed that the waste activity be sited in an old shale quarry. The waste material to be deposited is inert and will comprise of mainly spoil from construction activities and demolition material such as stone and concrete. No hazardous material such as asbestos or biodegradable material will be deposited as part of the waste activity.

It will be necessary to carry out an environmental impact assessment outlining the likely impact the development /activity is likely to have on the local/regional environment from a pollution perspective. The environmental impact assessment must include all measures that will mitigate against ground and surface water pollution, noise and vibration, dust, and air pollution and protection of local flora and fauna.

Site Suitability

It will be necessary to carry out a detailed investigation of the proposed site to determine its suitability for waste disposal. The investigation will require comprehensive details of:

- Characteristics of the topography
- Type and distribution of the geology.
- Land use in and adjacent to the proposed site.
- Distribution and vulnerability of any aquifers.
- Groundwater levels and flow patterns.
- Ground and surface water abstraction points.
- Ecology.
- Landscape.
- Proximity to property.

This information will be crucial in determining the suitability of the site of the proposed waste facility.

Design Considerations

Careful consideration should be given to the following matters at the design stage of the proposed facility.

- Nature and quantity of the waste material being deposited, and the life expectancy of the facility.
- Control measures for surface water runoff, and protection of groundwater and surface water.
- Environmental nuisance during the construction phase, (e.g. noise, vibration, dust, and mud.) and during the operational phase (e.g. noise, vibration, dust,
- Visual appearance of the facility during operational phase and after closure and its impact on the surrounding landscape.
- Monitoring requirements, provision must be made for the installation of environmental monitoring points both within the proposed site and outside the facility.
- Restoration and after use of the facility once filled to capacity.

Operation of the proposed Waste facility.

Landscaping

• The proposed facility should present an attractive and well managed appearance. Provision must be made for a buffer zone comprising of earth bunding around the entire site. The bunding should be planted with fast growing trees and shrubs. This will help minimise the risk of noise nuisance from the site and lessen the impact of the facility on the surrounding landscape.

Car Park/security lighting.

• Light pollution is becoming an increasing area of complaint for many members of the public. Therefore any light fittings provided for car parks or site security should be designed in such a manner that light does not cause glare or project into nearby residential dwellings increasing the likelihood of complaint.

Vermin

• The site should be inspected regularly for evidence of rat infestations. Where problems arise a competent pest control contractor must be employed and any treatments must be undertaken in accordance with the relevant recognised codes of practice. Pest control records must be kept and available for inspection at all times.

Dust

times.

• During dry weather conditions dust from waste activities can result in complaints from nearby residents. Measures to minimise nuisance include spraying site roads with a water bowser regularly, mechanically sweeping roads to prevent build up of dust, and minimising the speed of vehicles and plant on site.

Mud

Mud or waste must not be allowed to be tracked on to the public highway.
 Provision must be made for a wheel washing facility which must be used by all refuse vehicles before leaving the site. Regular sweeping of all access roads and roads within the site is also essential.

Leaks & Spillages.

 Measures must be taken to prevent leakage or spillage of any operational materials including oils or fuel. All fuel /oil tanks must be properly bunded to 110 % of their capacity.

Legionella Control

• All plant used for the distribution/heating/cooling of water supplies (e.g. water tanks, spraying equipment, pumps, showers etc) must be properly maintained and serviced to eliminate the risk and spread of Legionella. The equipment should be designed as far as possible to eliminate the production of aerosols. The temperature and quality of the water used should be such that it will not support the growth of Legionella. The plant and equipment should be cleaned, flushed and disinfected on a regular basis and preferably have residual disinfection at all times. Regular temperature surveillance monitoring of the water systems plan should be undertaken and microbiological samples obtained.

Noise

 All fixed noise generating plant and equipment should be incorporated into suitable acoustic enclosures or alternatively be adequately insulated and fitted with suitable noise attenuation/anti vibration devices in order to minimise the risk of noise nuisance to nearby residential dwellings. Any noise generated by the proposed activity should be at a level that it does not cause a nuisance to nearby residents and preferably should not be audible outside the site boundary.

Environmental Monitoring

- Monitoring will be required throughout the life of the proposed site, from preoperational phase, operational phase and the aftercare phase. The monitoring programme should include anything likely to be significantly impacted through the operation of the waste facility. A site record containing a complete description of the monitoring programme and a summary of the monitoring results should be maintained and available for inspection by members of the public. Similarly a complaints register should also be kept and available for inspection. All of the following environmental media should be monitored on a regular basis, it may be necessary to carry out monitoring on a weekly, monthly or quarterly basis depending on the likelihood of any of the parameters being impacted.
 - Groundwater.
 - Surface Water
 - Noise
 - Dust
 - Flora and fauna.

Restoration and Aftercare

- Once the proposed site has been filled to capacity the site must be closed to the standard required and the site must be maintained for a period of time sufficient to ensure that the site will have no adverse affect on the environment. During which time all environmental monitoring systems must be maintained and remain effective. These include ground and surface water monitoring points.
- Once the site is closed it will require to be restored to a condition suitable for a selected after use. Restoration will require specific designs, initial landscaping, and soil spreading to form a final land form, and aftercare will involve cultivation, fertilising, planting of the restored area. The aftercare period must ensure that the restored land achieves the required standard for the proposed after use.

Staff Canteen.

- The general requirements are outlined as follows. The kitchen areas must be of adequate size having regard to the nature and extent of the business- a minimum of one third the size of the total dining area is recommended.
- Adequate storage facilities must be provided for the proper storage of dry goods perishable and frozen foods. Dry goods store must be adequately ventilated to the external air.
- Sufficient food preparation sinks and work surfaces must be provided to avoid risk of cross contamination.
- Provision must be made for adequate natural and or /artificial lighting.
- A system of localised mechanical extraction fitted with grease filters and communicating directly with the external air must be provided over equipment and other steam emitting appliances.
- At least one hand wash basin must be provided for the use of food handlers in the kitchen and servery areas.
- Fly screens must be provided over all openable window space in the food preparation and storage areas.

- Adequate and separate wash –up facilities must be provided for washing of crockery and sufficient pot washing facilities must all so be provided.
- All finishes in the food preparation and storage areas must be smooth, durable and readily cleanable and be of such construction to protect against the accumulation of dirt, contact with toxic materials, the shedding of particles into food, and the formation of condensation or undesirable mould on surfaces.
- A cleaning store of adequate size with sluice sink must be provided.
- Adequate refuse receptacles must be provided in the food preparation area and adequate storage facilities must be provided for waste. A paved area properly drained with a water point is recommended.
- Suitable and sufficient ventilation shall be provided to comply with the following rates:

Kitchen area - 20 to 30 air changes per hour.

Restaurant area - 6 to 12 air changes per hour

Stores area - 6 to 12 air changes per hour.

Sanitary accommodation – 4 to 6 air changes per hour.

Toilet lobbies - 2 air changes per hour?

- The cold water supply shall be from the rising main to all cold water taps in the kitchen, and at any drinking water points.
- The proprietor must apply to the Health Service Executive for registration of the premises one month before the commencement of business.

Staff Facilities.

- Adequate and separate toilet accommodation should be provided for both male and female staff and at least one toilet should be suitable for wheelchair access. The toilets should not communicate directly with a food room, and the toilets should be constructed with an with an intervening lobby. Both the toilet and the lobby shall be separately and adequately ventilated to the outside of the building. The doors to the toilets and the intervening lobby shall be self-closing.
- Wash hand basins shall be supplied with either hot and cold water or warm water at a temperature of (45 C to 55 C), non- perfumed liquid soap and suitable hand drying facilities such as single use towels should be provided.

I trust that the information outlined above will be helpful in the decision making process on the proposed waste management licence application. I look forward to hearing from you at your earliest convenience meanwhile, should you require any further information please do not hesitate to contact me on the above mentioned telephone number.

Yours sincerely,

Mr. Ray Parle

Principal Environmental Health Officer.

CC. Mr. Martin Devine

Assistant National Director, Population/Environmental Pealth HSE (South), 2nd Floor, Oak House, Lime Tree Avenue, Millennium Park,

Naas.Co. Kildare.