



Submission

Submitter:	Miss Fiona Byrne
Organisation Name:	HSE
Submission Title:	W0306-01
Submission Reference No.:	S005893
Submission Received:	16 December 2019

Application

Applicant:	South Dublin County Council
Reg. No.:	W0306-01

See below for Submission details.

Attachments are displayed on the following page(s).

*For inspection purposes only.
Consent of copyright owner required for any other use.*



Date: 13 December 2019

Our reference: 1044

Licence Type: Waste

Name and address of applicant: South Dublin County Council, County Hall,
Tallaght, Dublin 24, Dublin

Location of facility: New Nangor Road, Clondalkin, Dublin 22,
Dublin 22, Dublin, D22 WY66

Reference No: W0306-01

EIS/EIAR submitted: Yes

**Planning Authority to whom
EIS/EIAR has been submitted:**

Classes and Nature of Activity in accordance with the Waste Management Act 1996 as amended		
Class of Activity	Principal Activity	Class of Activity Description
R05	Yes	Recycling/reclamation of other inorganic materials, which includes soil cleaning resulting in recovery of the soil and recycling of inorganic construction materials

Introduction

The following HSE departments were notified of the consultation request for the licence application on 18th November 2019

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Ann O’Shea

This report only comments on Environmental Health impacts of the licence application.

General

Grange Castle Golf Club (GCGC) was established in 1998 and is owned by SDCC. The golf course is located within a parkland with an 18 Hole course, with seven lakes and a number of streams. The main entrance to the golf course is located just off the Nangor Road. A club house including a small café, toilet facilities and car park are located on the north of the site. A maintenance yard and associated building are located to the rear of the club house.

The EPA received a number of complaints about the site in relation to the use of soil waste material being used as infill material to provide mounding around the perimeter of the course and between fairways. Initially the EPA issued a decision indicating that the activity was not subject to a requirement for waste authorisation. However following this decision, two additional complaints were received and in October 2010 a site inspection was completed by the EPA whereby the EPA advised that it was rescinding the previous declaration and considered the infill material to be a waste and subject to waste management legislation and advising of the necessity for a Waste Licence for the site.

In February 2011, SDCC commissioned an Environmental Risk Assessment (ERA). This ERA was completed on the Phase 1, Phase 2 and Phase 3 in February 2011. This ERA report was submitted to EPA in May 2011. Following receipt of this ERA, the EPA requested SDCC to provide a proposal to regularise the site in accordance with the Waste Management Act, 1996 (as amended) having regard to Ministerial Direction of 3rd May 2005 (Circular WIR: 04/05).

A retrospective Waste Licence for the subject site as a Soil Recovery Facility is being sought. The waste licence application is being made to regularise the site in respect to the historical unregulated importation of soil onto the site

All commitments to future actions, including mitigation and further testing, have been taken as read and all data has been accepted as accurate. No additional investigation/measurements were undertaken in the review of this application.

The Environmental Health Service is not aware of any complaints received regarding Grange Castle Golf Club (GCGC).

In respect of this application for waste, the areas reviewed were those of concern to Environmental Health which are:

- any potential contamination of surface water or ground water
- emissions to air, including noise and odour

Site Location

South Dublin County Council (SDCC) owns GCGC which is located off the N7 road at Clondalkin, Dublin 22.

The golf course is bounded by the R136 Outer Ring Road to the east and the Nangor Road to the north. A number of industrial units are located immediately north of the main entrance off the Nangor Road. Corkagh Park is located immediately to the east.

Casement Aerodrome, a military airbase owned by the Irish Department of Defence, is situated to the south west. A business park and football club and pitch are located to the south.

High density housing developments are located to the north east. In 2007, 125 acres of land to the west of the site were developed for Profile Park Business Park and a number of data centres are also located in this area.

The surrounding landscape is made up of a patchwork of pasture and arable fields, with grassland being the dominant land cover. The field system is separated by clumps of mixed woodland and sparse hedgerow networks. Dense patches of mixed woodland, playing pitches and landscaped areas dominate the southern part of the area in Corkagh Park. The predominant landscape character type is flat urban fringe farmland.

Ground water, surface water and soil

The EPA requested an Environmental Risk Assessment which was carried out in 2011.

An EIAR was provided to support the Waste Licence application by South Dublin County Council to the EPA for a Soil Recovery Facility at the Grange Castle Golf Club.

Aftercare monitoring of dust, surface water and groundwater was proposed at a series of locations to be agreed with the EPA under the Waste Licence.

Surface water:

The site is located within Liffey and Dublin Bay WFD catchment which forms part of the Eastern River Basin District as defined under the EU Water Framework Directive European Communities Directive 2000/60EC.

The Camac River flows along the south and east perimeter of the site and continues north east flowing into the river Liffey. The Baldonnell Stream is located to the east of the site and flows northerly discharging into the river Liffey.

Sampling of surface water was carried out during the 2011 ERA, the results indicated exceedances of manganese at one location and chloride and suspended solids at another. It was suggested these contaminants were from offsite sources.

Both the Baldonnell Stream and the Camac River will be monitored (upstream and downstream) periodically as part of the ongoing licence requirements. Standard surface water runoff parameters will be assessed at intervals agreed with the EPA.

Ground Water:

The limestone bedrock underlying the site is classified as a locally important (Li) aquifer, i.e. bedrock which is moderately productive in local zones only. There are no gravel aquifers in the vicinity of the site.

A small number of wells are located to 1km to the south east and 2km to the north east of the site. The well uses are listed as industrial or unknown and tend to produce 'good' well yields.

Groundwater monitoring is proposed at a series of four wells to be installed at the site (one upstream at the south east of the site) and two downstream of the site. Samples will be assed against the EPA groundwater threshold values.

Soils and Subsoils:

According to the GSI the majority of the site is underlain by till derived from limestone with a thin band of Alluvium to the east of the site. Site conditions encountered during the ERA completed by

RPS in 2011 reported infill material within Phase 2 and Phase 3 which comprised light brown slightly gravelly clay with some cobbles. The 2011 ERA calculated the volume of infill material was 90,230m³ for Phase 2 and 126,726 m³ for Phase 3. The material comprised of grey/brown gravelly clay matrix with a minor waste component comprising materials such as plastic, tarmac, textiles, timber, brick, concrete and metals.

Samples were collected for the stockpiled material and analysed for a broad range of analysis including Waste Acceptance Criteria (WAC) for inert landfills with resulting data indicating that the material is acceptable for disposal at an inert landfill. Soil analytical data indicated that the infill material contained low levels of hydrocarbons and heavy metals which were not considered to pose a risk to human health or the environment.

Emissions to air, including noise and odour

Air:

There are no significant existing emissions from the subject site. There is a potential for fugitive dust emissions from the existing material remaining on site, however, the effects are deemed imperceptible given the existing ground colonisation by plants that bind the material.

Four dust gauges will be put in place on site to continually monitor levels and ensure monthly dust levels will remain below the guideline of 350mg/m²/day as a 30-day average at sensitive receptors as outlined in the German Government TA Luft guidance.

Noise:

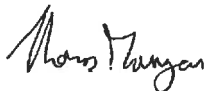
The subject site will not be a source of noise emissions, as there will be no activity, processing, or traffic movements and so there will be no change to baseline/existing noise emissions sources in the vicinity.

Conclusion

The Environmental Health Service makes no recommendations in respect of this waste licence application as there are no significant existing emissions from the subject site as highlighted above.



Tom Prendergast
Principal Environmental Health Officer



Thomas Mangan
Environmental Health Officer
Environment Operational Unit

For inspection purposes only.
Consent of copyright owner required for any other use.



Environmental Health Officers Department
4th Floor, Chamber House
Chamber Square
Tallaght
Dublin 24

Tel: (01) 468 6375
Fax: (01) 468 6344

Date: 13 December 2019

Name: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

Re: Waste Licence Application W0306-01

Applicant: South Dublin County Council, County Hall, Tallaght, Dublin 24

Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above licence application. If you have any queries regarding any of these reports the initial contact is Mr Tom Prendergast, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,


Tom Prendergast
Principal Environmental Health Officer

For inspection purposes only.
Consent of copyright owner required for any other use.