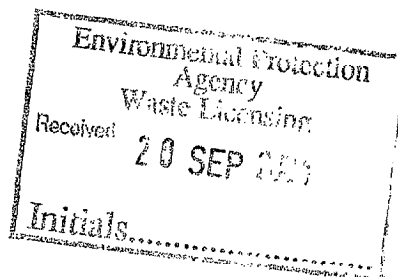


BORD NA MÓNA

BORD NA MÓNA ENVIRONMENTAL LIMITED

Administration,
Office of Licensing & Guidance,
Environmental Protection Agency,
Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.



16th September 2004

Reg No. 152-~~3~~ 3

Re: Application for Review of Waste Licence for the Oxigen Environmental Ltd.
facility at Robinhood Road, Dublin 22.

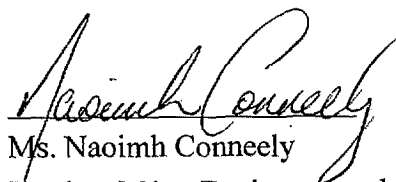
Dear Sir/Madam,

In accordance with the requirements of the Waste Management (Licensing) Regulations, 2004, please find attached

- an original and 3 No. Copies of the review of waste licence application,
- an original and 3 no. copies of the associated Environmental Impact Statement
- a compact disk with digital copies of the complete application.

for a review of a waste licence application for the waste transfer facility at Robinhood Road, Dublin 22. If you have any queries please do not hesitate to contact me.

Yours sincerely,



Ms. Naoimh Conneely

Bord na Móna Environmental Ltd.

On behalf of Oxigen Environmental Ltd

MAIN STREET, NEWBRIDGE, CO. KILDARE, IRELAND.
TELEPHONE: (045) 431201. INT: +353-45-431201. FAX: (045) 434207. INT: +353-45-434207.

REGISTERED OFFICE: MAIN STREET, NEWBRIDGE, CO. KILDARE.
REGISTERED IN IRELAND NUMBER: 303313

SECTION 1
INTRODUCTION

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1.0 INTRODUCTION

Oxigen Environmental Ltd. propose to construct and operate a waste baling station at their premises at Robinhood Industrial Estate, Robinhood Road, Clondalkin, Dublin 22. The site is located within Robinhood Industrial Estate and is approximately 0.5km west of the M50 Motorway, close to the Red Cow Roundabout.

Bord na Mona Environmental Ltd. were retained by Oxigen Environmental Ltd. to prepare an Environmental Impact Assessment/Statement (EIA/EIS) and a Review of Waste Licence Application in respect of the proposed development.

Oxigen Environmental Ltd. was established as Wheelbin Services Ltd. in 1988, and changed its name to Oxigen Environmental Ltd. in 2000 to reflect changes in the waste industry, and in particular the company's approach to the waste problem. The development of a single treatment (i.e. baling of waste) waste facility at Robinhood Road, will allow the company to provide the necessary service to its other waste facilities, as well as to Local Authorities and suitably permitted/licenced private waste contractors. Planning permission for the operation of a waste facility (SD01A/0226) and for the provision of the necessary site infrastructure (SD02A/0382) has been granted by South Dublin County in June 2001 and November 2002 respectively.

The site has previously been owned by South Dublin County Council, and had been operated as a cleansing depot for county council waste vehicles. The site was purchased by Oxigen Environmental Ltd. in 1999, where the site was operated as a waste facility under a waste permit (WPR 020) granted by South Dublin County Council. In 2001 Oxigen Environmental Ltd. applied to the Environmental Protection Agency for a waste licence to operate a waste transfer facility at the site. A waste licence (Register No. 152-1) was granted in 2001 (see Attachment 3 for existing waste licence), which permits the acceptance of commercial, industrial, household and construction and demolition waste, to a maximum volume of 24,600 tonnes per annum.

Oxigen Environmental Ltd. are applying to the Environmental Protection Agency to review the existing waste licence, to change the use of the facility from a multi treatment waste facility (i.e. waste sorting, and recycling) to a single treatment waste baling facility, and to an increase the volume of waste accepted at the facility from twenty four thousand and six hundred tonnes of industrial, commercial, household and construction and demolition waste to one hundred and sixty thousand tonnes of municipal and commercial waste.

Drawings No D.1 in Appendix 2 shows the proposed Site Infrastructure. A detailed description of the proposed development is provided in Section 2.

The development will be supported by its close proximity to the large domestic and commercial/business markets of the greater Dublin area and the existing road and services infrastructure serving the existing development and surrounding industrial estate.

The site is located in the administrative area of South Dublin County Council and is zoned “E – *To provide for industrial and related uses*” under the existing County Development Plan, 1998, and is zoned “E – *to provide for enterprise, employment and related uses*” under the draft County Development Plan 2004 - 2010. Under these zoning codes the ‘Refuse Transfer Station’ are classed as being ‘*permitted in principle*’.

1.1 DEVELOPMENT PROPOSAL – OVERVIEW

1.1.1 Need for development and Waste Management

Currently, 74 million tonnes of waste is generated every year in Ireland, with household, commercial, manufacturing and construction and demolition making up 15.5 % of this. (National Waste Database Report, 2001). While the national target of 50% recycling/recovery of C & D waste has been met (actual 65.4%), the recycling rate of household and commercial waste is still considered low at 13.3%. This dependence on the landfilling of waste has become a concern as it was noted in the National Waste Database Report 2001, that six of the ten waste management planning regions have less than three years remaining landfill capacity. Therefore moves towards more recycling and recovery centres have become a priority for many regions, with the pre - baling of waste being a requirement of some landfill facilities such as Arthurstown Landfill facility.

The Dublin Waste Management Plan represents common regional action by the four Dublin Authorities –Dublin City Council, Fingal County Council, South Dublin County Council and Dun Laoghaire – Rathdown County Council, and was adopted in December 1998. A key objective of the plan is to reduce dependence on landfill and increase private sector involvement in waste management chain. The Waste Management Plan was designed to dramatically reduce the dependence on landfill, with the 80% that was being diverted to landfill in 1997 required to be reduced to 16% in 2004, through the implementation of extensive recycling schemes and the introduction of thermal treatment schemes.

It is anticipated that this target can be achieved through the diverting of C&D waste, and increasing the recycling rate from 20% (for all waste streams in 1997) to 60%. The plan also sets out ambitious waste minimisation targets aiming to reduce annual growth rates for all categories of waste to 0.5% in 2003 and to 0% by 2007.

The Waste Management Plan identified an urgent requirement for additional baling capacity in order to maximise the use of available void space at the Arthurstown Landfill Facility, and proposed landfill facilities within the rest of the region. Maximising inputs to landfill facilities has become a priority in an attempt to extend the life of the existing facilities. The additional baling capacity requirement can be met in two ways either by the private sector or directly by the Dublin Local Authorities as in the case of the existing baling station at Ballymount. Baling of waste for landfill facilities also helps reduce the volume of wind blown litter from the landfill, and the number of vehicle movements to and from the landfill.

1.1.2 ALTERNATIVES CONSIDERED

The existing waste management strategies governing the site are outlined above. The proposed development shall provide the necessary waste infrastructure for both the existing waste facilities operated by Oxygen Environmental Ltd., for the Local Authorities and suitably permitted/licenced private contactors within the Dublin region.

The location of the baling station within the Robinhood Industrial Estate will have three main advantages:

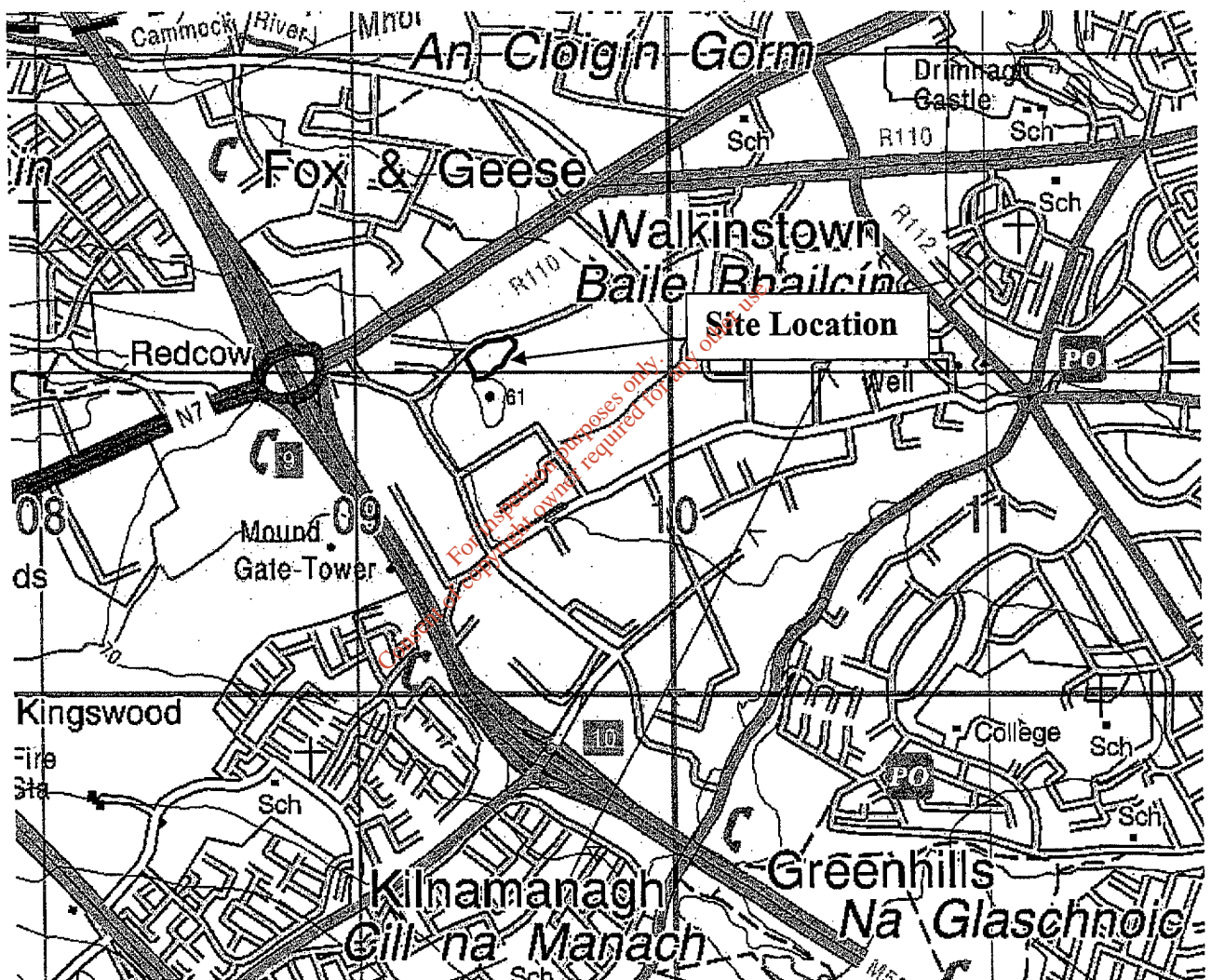
- It is located within an industrialised area with a large customer base, which thereby reduces the transportation distances for the waste
- It is located in close proximity to supporting waste infrastructure such as Arthurstown Landfill facility
- A good road, services (namely water and foul sewers) and telecommunications infrastructure already exists at the site.

This will reduce the overall cost of disposal of the material, and extend the capacity of the receiving landfill facility.

1.2 SITE DESCRIPTION

The proposed development site is part of the overall Robinhood Industrial Estate. The site was historically used as a cleansing depot by South Dublin County Council, until 1999 when it was purchased by Oxigen Environmental Ltd. The site is currently operated as a waste transfer facility in accordance with the requirements of its waste licence (Register No. 152-1) and planning permissions (County Council No. SD01A/0226 and SD02A/0382)..

Figure 1.2/1 Regional Location of Site



The existing entrance to the site is located to the north west of the facility and enters directly onto Robinhood Road. A planning application (SD04A/0488) has been submitted to South Dublin County Council for the construction of an additional entrance at the facility (see Appendix 2: Site Infrastructure). This infrastructural development will allow vehicles to use the existing entrance for gaining access to the site, and the proposed new entrance as the exit

for the site. The site is located within an industrial estate setting and is fronted to the north by the Robinhood Road, and on all three remaining aspects by industrial/commercial units.

Currently, the site is covered by an impervious hardstand cover and there is no exposed soil/green area on site. The site is adjoining an area of historic quarrying and the site itself may have had been subject to quarry activities in the past. The site is located where the old pumping station for Walkinstown is located, this would have required the backfilling of the adjacent quarry to allow for the foundations of the pumping station. As a result of this, the subsoil beneath the site may have been altered.

The site is located within the River Liffey catchment, in the sub-catchment of the River Cammac, via the Robinhood stream. (refer to section 3.4; Hydrology) .

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1.3 ENVIRONMENTAL IMPACT STATEMENT (EIS)

An Environmental Impact Statement (EIS) is required to accompany a review of Waste Licence Application, where the proposed volumes of waste are above a certain threshold volume (greater than 25,000 tonnes per annum), as outlined in Schedule 5 Part 2 of the Planning and Development Regulations, 2001 (S.I. 600 of 2001). The proposed volume throughput of the baling station is above the threshold value and therefore an EIS will accompany the review of Waste Licence Application to the Environmental Protection Agency.

This Environmental Impact Statement is based on the structure as outlined in the Planning and Development Regulations, 2001, and in accordance with the following Environmental Protection Agency documents:

'Advice notes on Current Practice in the Preparation of Environmental Impact Statements' (1995); and

'Guidelines on the Information to be contained in Environmental Impact Statements' (2002)

In determining the potential impacts of the operation of the waste transfer facility the Environmental Impact Statement focused on impacts that 'are environmentally based', 'are likely to occur' and to 'have significant and adverse effects' (EPA Guidelines on Information to be contained in Environmental Impact Statements, 2002)

1.4 STRUCTURE OF THE ENVIRONMENTAL IMPACT STATEMENT

Schedule 6 of the Planning and Development Regulations, 2001 sets out the information to be contained within an EIS. The structure of this Environmental Impact Statement adopts a sequence, which is broadly in line with these requirements. The sequence is as follows:

- A non-technical summary
- A description of the proposed development
- A description of the baseline receiving environment
- The potential and predicted impacts of the development and mitigation of those impacts.

The existing environment and the subsequent impacts of the development are explained by reference to its possible impact on the following environmental topics:

Human Beings	Flora and Fauna
Soil & Geology	Hydrology
Hydrogeology	Air
Noise	Traffic
Climatic Factors	Landscape
Cultural Heritage	Material Assets
Interactions of the above	

Where appropriate, throughout the document the impacts of the proposed development on each of the above environmental topics are dealt with under the following headings:

- 1 Introduction
- 2 Baseline Environmental Assessment
- 3 Environmental Impacts
- 4 Mitigation Measures

Supporting documentation and maps is appended to the document.

1.5 CONSULTATION AND SCOPING

A range of government departments, agencies and bodies, non-governmental organisations and interest groups were consulted during the preparation of the Environmental Impact Statement in order to ensure that all relevant issues were addressed. Specific concerns raised relating to any issue, environmental or otherwise, could subsequently be considered via design or procedural modifications or by the implementation of appropriate mitigation measures. Appendix 1 details the range of bodies which were consulted and the views expressed by same.

Pre-licence application consultation meetings were held with the EPA to determine the scope of the investigations required for the waste licence application.

During the internal scoping phase, several aspects of the long-term operation of the development were identified as requiring close attention: they included waste acceptance procedures, environmental monitoring, potential loads on existing water and wastewater treatment resources and construction impacts associated with air and noise. Table 1.5/1 overleaf indicates the possible impacts of the facility:

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TABLE 1.5/1: MATRIX FOR THE POSSIBLE ENVIRONMENTAL IMPACTS ASSOCIATED WITH THE WASTE BALING FACILITY AT ROBINHOOD ROAD, DUBLIN 22.

	Structure	Water Emissions	Abstraction	Air Emissions	Traffic	Noise & Vibrations
Human Beings	Visual aspects	Possible impacts on local groundwater supplies	Possible impacts on local groundwater supplies	Dust emissions,	Increased traffic Traffic emissions	Noise & vibrations generated from site Noise generated from traffic
Flora & Fauna	-	-	-	Dust emissions,	Increased volumes of heavy traffic Traffic emissions	Noise & vibrations generated from site Noise generated from traffic
Soil & Geology	-	-	-	-	-	-
Hydrology	-	-	-	-	-	-
Hydrogeology	-	Possible Groundwater impact	Possible impacts on local groundwater supplies	-	-	-
Air	-	-	-	Dust emissions	Traffic emissions	-
Climate	-	-	-	Microclimate Acid rain/ greenhouse effect	Traffic emission	-
Landscape	Visual aspects	-	-	-	-	-
Material Assets	Property value, visual aspect	Possible impacts on local groundwater supplies	Possible impacts on local groundwater supplies	Property value: dust & emissions aspect	-	Property value: noise & vibration aspects
Cultural Heritage	Existing undiscovered archaeological features	-	-	-	-	-

TABLE 1.5/2: SUMMARY OF THE ENVIRONMENTAL IMPACTS OF THE WASTE BALING FACILITY AT ROBINHOOD ROAD, DUBLIN 22.

	Human Beings	Flora	Fauna	Soil & Geology	Water	Air	Climate	The Landscape	Material Assets	Cultural Heritage
Human Beings		none	none	none	3.4, 3.5	3.6	none	3.10	3.12	none
Flora	none		none	none	none	3.6 & 3.2	none	none	none	none
Fauna	none	none		none	none	none	none	none	none	none
Soil & Geology	none	none	none		none	none	none	none	none	none
Water	3.4 & 3.5	3.4 & 3.5	3.4 & 3.5	none		none	none	none	3.1 & 3.4	none
Air	3.6	3.6 & 3.2	none	none	none		none	none	none	none
Climate	none	none	none	none	none	none		none	none	none
Landscape	3.10	none	none	none	none	none	none		3.12	none
Material Assets	3.12	none	none	none	3.1 & 3.4	none	none	3.12		none
Cultural Heritage	none	none	none	none	none	none	none	3.11	none	
Traffic	3.6 & 3.8	none	none	none	none	3.6	none	none	none	none

Note: This Table identifies the Section of the EIS where impacts or effects on interactions between environmental media are discussed.

Any interactions which will not be impacted upon or affected by the facility are not described in the EIS.

1.6 CONSULTING TEAM

The following specialists contributed to the areas indicated:

Environmental Impact Assessment Project Management: Bord na Móna Technical Services,
Main Street,
Newbridge,
Co. Kildare.

Human Beings
Soil & Geology
Cultural Heritage
Surface Water Assessment
Hydrogeological Assessment
Air Assessment
Noise Assessment
Traffic & Road Assessment
Landscape Assessment
Flora & Fauna Assessment
Climate Factors
Material Assets

Bord na Móna Technical Services,
Main Street,
Newbridge,
Co. Kildare.

Data for this project was obtained from the following departments, agencies or consultancies:

- Woods Environmental Management Ltd.,
- TMS Environmental Ltd.
- South Dublin County Council,
- Dublin City Council Central Water Laboratory,
- Environmental Protection Agency,