

152-3
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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.

21st February 2005

Reg. No.: 152-3

Re: Response to the Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

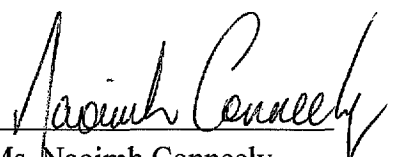
Dear Ms. Hermansen,

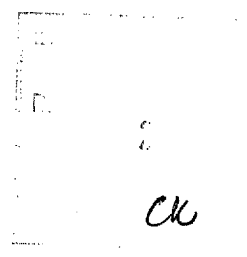
Please find attached the following information as requested by the Agency in accordance with the Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations:

1. An original and 3 No. Copies of the Article 12 Compliance Information
2. An original and 3 No. Copies of the Article 13 Compliance Information

If you have any queries please do not hesitate to contact me.

Yours sincerely,


 Ms. Naoimh Conneely
 Bord na Móna Environmental Ltd.



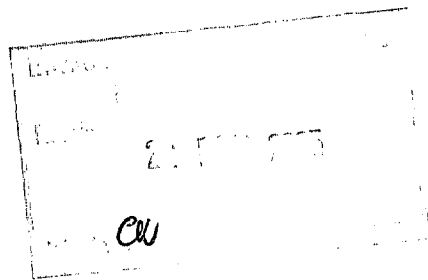
On behalf of Oxigen Environmental Ltd

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**OXIGEN ENVIRONMENTAL LTD.,
(WASTE LICENCE REGISTER NO. 152-3)
WASTE BALING STATION,
ROBINHOOD INDUSTRIAL ESTATE,
ROBINHOOD ROAD,
BALLYMOUNT,
DUBLIN 22.**

ARTICLE 12 COMPLIANCE INFORMATION

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A Submission by Bord na Móna Environmental Ltd.
on behalf of Oxigen Environmental Ltd.

Detailed below is the information required for the Article 12 as requested in the correspondence received by the Environmental Protection Agency on the 8th February 2005.

A.1 Non Technical Summary

A revised non-technical summary for the Waste Licence Application accompanies this response (see Attachment A).

D.1 Infrastructure

The omitted page has been submitted in Attachment B.

H.10 Discharge to Sewer

A revision of Table H.10 is given in Attachment C.

H.8 Noise – impacts and mitigation

A revised Environmental Monitoring Map (J.1 rev A) has been included in Attachment D.

K.1 Contingency Arrangements

A copy of the Emergency Response Procedure can be found in Attachment E of this response.

Attachment A
Revised Non-Technical Summary

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Oxigen Environmental Ltd. currently operates a waste baling station at their premises at Robinhood Industrial Estate, Robinhood Road, Clondalkin, Dublin 22. Oxigen Environmental Ltd., with its registered office located at 3, The Crescent, Dundalk, Co. Louth (Company Registration No. 139891), has a correspondence address at Unit D, Westland Park, Willow Road, Clondalkin, Dublin 12 (phone 01-4659868). The site is located within Robinhood Industrial Estate and is approximately 0.5km west of the M50 Motorway, close to the Red Cow Roundabout, with a national grid reference of E309466 N231082..

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, 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.

It is intended to upgrade the existing waste facility to a single treatment (i.e. baling of waste) waste facility at Robinhood Road, which will allow Oxigen Environmental Ltd. to provide the necessary service to its other waste facilities, as well as to Local Authority 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 was previously 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 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, which permits the acceptance of commercial, industrial, household and construction and demolition waste, to a maximum volume of 24,600 tonnes per annum.

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*'.

The site is located within the sub-catchment River Camac which is a tributary of the River Liffey. Surface water from the facility currently discharges into the South Dublin County Council surface water sewer, which serves the Robinhood Industrial Estate, via an oil interceptor and silt trap. This sewer discharges into the Ballymount Stream, which in turn discharges into the Camac River.

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 relevant waste disposal and waste recovery activities, as per the Third and Fourth Schedules of the Waste Management Act 1996, to which this application relates are:

Third Schedule - Waste Disposal Activities. Activities that occur onsite relevant to the Third Schedule are –

- 'Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule'
- 'Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule',
- 'Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced'.

There are no activities within the Fourth Schedule of the Waste Management Act, 1996, that are applicable to this application.

Proposed Review of On-site Operations:

Oxigen Environmental Ltd waste baling facility will accept waste between 06:00 to 20:00 Monday to Saturday. There will be no waste removed from the site after 20:00. Entry onto the site will be restricted to employees of Oxigen Environmental Ltd. and permitted/licenced waste contractors at all times during the operation of the facility. Outside the hours of traffic movements to the site (i.e. between 06:00 and 20:00), the

gate will be closed and access is only permitted by the key personnel (i.e. site manager, recycling building staff etc).

The waste that will be accepted at the site will be restricted to municipal and commercial waste. The European Waste Catalogue codes for the site are:

- 16 06: Batteries and accumulators,
- 20 01: Separately collected fractions (except 15 01)
- 20 02: Garden and Park wastes
- 20 03: other municipal wastes

All wastes accepted on site will be inspected, with non-conforming, or dangerous (i.e. gas cylinders etc.) wastes removed prior to transferring the wastes to the baler. Any waste not deemed suitable for the baler shall be removed to the waste quarantine area. The wastes, that are deemed to be in non-compliance with the relevant waste licence, upon inspection, are returned to source (if determinable) or stored within the banded quarantine area prior to authorised disposal off-site.

The European Communities (Control of Major Accidents Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000) do not apply to this site.

A weighbridge currently exists at the entrance of the facility, which is linked to an automated software system that records all data regarding incoming waste. It is proposed to install an additional site entrance at the facility, which will permit one way traffic movements within the site. The existing entrance (to the north west) will be used for entrance only to the facility, with the proposed entrance to be used as an exit only. A planning application has been submitted to South Dublin County Council (SD04A/488), with a decision on this application expected in November 2004.

The site is currently licenced (Waste Licence Reg. No. 152-1) to accept twenty four thousand and six hundred thousand tonnes of waste at the facility. It is proposed through this review to increase the volume of waste acceptable at the facility to one hundred and sixty thousand tonnes. It is emphasised that these quantities of waste do not represent the overall capacity of the waste baling plant.

Oxigen Environmental Ltd. have developed an Environmental Management System for the facility in accordance with the requirements of the existing waste licence (Reg. No. 152-1). Waste is delivered to the facility by Oxigen Environmental Ltd employees, County Council employees or by suitably permitted/licenced waste contractors.

Waste containers are visually inspected prior to its acceptance by the vehicle operator to ensure that the waste type is allowed to be accepted under the requirements of the waste

licence. Prior to gaining access to the site the vehicle operator is required to provide the necessary information, such as the waste type, source of the waste, vehicle type, vehicle operators name, and any other relevant information deemed necessary by the weighbridge operator. The load will be required to be verified by the computer system prior to the barrier being raised.

The vehicle operator is directed to the appropriate waste tipping area using a traffic light system. The vehicle operator will reverse into the required waste tipping area, where its load is deposited. If on initial inspection the load contains non conforming waste streams, the vehicle operator will be required to remove the entire load from the facility, prior to exiting the site. Once the waste has been tipped on the floor it is visually inspected prior to being transported to the on-site baler. This is to ensure that all non-conforming, or dangerous (i.e. gaseous cylinders), are removed from the waste load, and is immediately removed to the waste quarantine area. The waste is stored in the quarantine area pending its removal off site by the waste producer. In the event of the producer refusing to remove the waste, or the source of the waste is unknown, Oxigen Environmental Ltd will ensure that it is removed off site and disposed of at an appropriate facility as soon as possible. Oxigen Environmental Ltd. will maintain records of the waste type, quantity, and ultimate disposal/treatment facility.

Outside waste acceptance hours the security gate is closed and access is only permitted by the key personnel (i.e. site manager, baling staff etc).

Raw materials used on-site for plant equipment and for vehicles are stored in either the bunded tank on site, or are located on portable bunds within the maintenance shed. All bunded units have their integrity tested every three years in accordance with the existing waste licence, to ensure compliance with industrial standards. (BS8007:1987).

Emissions

Oxigen Environmental Ltd. will ensure that baling of waste at the Robinhood Industrial Estate site will be carried out in a safe and environmentally sound manner, such that:

- Emissions from on-site baling activities will not result in the contravention of any relevant standard, including any standard for an environmental medium, or any relevant emission limit value, prescribed under any other enactment.

- On-site baling activities will be carried out in accordance with such conditions as may be attached to the relevant Waste Licence, and not cause environmental pollution.
- BAT technologies will be used, if practicable, to prevent/eliminate or, where this may be deemed not practicable, limit/abate/reduce emissions of environmental concern resulting from on-site disposal and recovery activities.

In order to predict the impacts of on-site operations on the existing site and its environs an appropriate environmental assessment was undertaken at the facility. Bord na Mona were commissioned to conduct all required assessments.

Potential air emissions are examined under two separate headings:

- i. Traffic Emissions
- ii. Dust

Traffic Emissions: Atmospheric emissions relating to the movement of traffic were monitored at the facility. It was concluded that the impact from the increase in traffic movements would be negligible at the facility.

Dust: As part of the existing waste licence Oxigen Environmental Ltd. have monitored dust generation three times annually. This monitoring identified some elevations in the dust levels. This however has been as a result of the existing traffic movements on the adjacent Robinhood road, and due to the construction undertaken at the site. It is proposed to continue monitoring the dust generation at the facility to ensure that the levels have reduced, now that the construction works have been completed.

Surface water run-off from all hardstanding areas is in a northern eastern direction. Drainage water is then directed towards a silt trap and oil interceptor prior to discharge to the adjacent surface water sewer system that discharges into the Robinhood Stream.

Oxigen Environmental Ltd. are required to monitor the surface water discharges from the facility on a quarterly basis. These results indicate that due to the existing stringent operational practises on site and the separate collection of all leachate generated at the site, the impact that the facility will have on the local surface water will be negligible.

All foul wastewater, process wastewater and leachate generated on site is separately collected and discharged into the South Dublin County Council foul sewer system that serves the Robinhood Industrial Estate. This foul wastewater will be treated at the Ringsend Wastewater Treatment facility.

A preliminary investigation of the Cultural Heritage of the site and surrounding environs was carried out. Due to the fact that the site is located within a heavily industrialised area, and that nearest historical site is located over 250m from the facility, it is anticipated that the operation of the waste baling facility will not impact on the Cultural Heritage of the area.

A baseline ecological survey was conducted at the site. As the site is completely covered with hardstand, it is anticipated that there will be no impact on the flora or fauna due to the proposed development. The existing site or its environs is not designated as a Natural Heritage Area or a Special Protection Area under the Birds Directive or as a Special Conservation Area in accordance with the Habitats Directive, nor, is it designated under any of the other nature conservation designations currently used.

As part of the conditions of the existing waste licence, Oxigen Environmental Ltd. have undertaken noise monitoring at the facility on an annual basis. The results from this noise monitoring has indicated that the proposed activities on the existing facility will have a minimal impact on the noise within the vicinity of the site.

It is considered that the Oxigen Environmental Limited site does not visually impact on the surrounding areas. The site is located within an industrial estate, with the buildings on site being of similar nature and structure of the other buildings on site.

The activities do not appear to have impacted on changes in land use activity. Furthermore, current procedures e.g. continued enclosure/covering of waste material; efficient/immediate sorting and baling ensure that potential nuisances from e.g. odours, dust and pests are not likely.

The site has not been operational between February and September 2004, during which time Oxigen Environmental Ltd. have had a complete change of personnel at the Robinhood facility from the Facility Manager down. The Manager and two assistant Managers have completed as a minimum the FÁS Waste Management course.

Contingency arrangements at the site are considered sufficient to deal with any unexpected/uncontrolled event. As part of the Environmental Management System,

Oxigen Environmental Ltd. have developed an Emergency Response Procedure for the facility. Training in fire fighting and evacuation has been provided for all staff.

It is proposed to undertake the following monitoring at the facility, in line with the requirements of the Waste Licence:

Dust:	Three times per year at three locations
Sewer:	Quarterly at one location
Noise:	Annually at four locations
Surface water:	Quarterly at two locations

Oxigen Environmental Ltd. is planning major investment and development of the above site to provide a high-tech waste management facility to address the long-term recycling objectives set by the EU. Therefore it is not envisaged that the site will be decommissioned in the short to medium term. However, on cessation of activities at the above facility, it is proposed that the site be decommissioned in accordance standard procedures and in agreement with the Environmental Protection Agency. Once the decommissioning process has been completed, the site will be left vacant and suitable for occupation by another operation.

The function of the Oxigen Environmental Ltd. baling facility at Robinhood Road will enable the volume of waste being diverted to landfill to be deposited in an efficient manner. The baling of waste ensures that the waste is compacted enabling a larger volume to be deposited into each landfill cell, and it also reduces the level of wind blown litter within the vicinity of landfills. The continued operation of this site in Robinhood is important both for the prolonging of the life span of landfills within the Dublin Regions, but is also required to help Oxigen Environmental Ltd. to improve its waste services for the eastern region.

Attachment B
Omitted page from Attachment D.1

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and gear oils for the on-site vehicles shall be stored in the adjacent shed. All materials are stored on portable bunded units or bunded storage cabinets.

D.1.h. WASTE QUARANTINE AREA

A bunded waste quarantine area is located within the waste processing building (see Drawing D.1: Site Infrastructure). This area has been constructed to temporarily store any waste loads which are deemed outside the plant waste acceptance criteria.

D.1.i. WASTE INSPECTION AREA

There is a waste inspection area located within each bay of the waste processing building, which allows the waste to be tipped on the floor and non-conforming and dangerous (e.g. compressed gas cylinders) waste to be removed from the waste stream prior to removal to the baler. This waste is then transferred to either the designated receptacles (for fluorescent light bulbs, batteries etc.) or to the waste quarantine area.

D.1.j. TRAFFIC CONTROL

Access to and from the site is controlled by security barriers operated by the weighbridge operator/site manager. Vehicles enter the site via the north western entrance, where the weighbridge officer will record the necessary details (see D.1.d above), and prior to allowing access onto the site. The weighbridge operator will direct the vehicle operator to the appropriate loading/waste inspection bay using a green light traffic system. When the vehicle operator has unloaded the waste, he/she will progress to the exit, where the weighbridge operator will record the necessary details prior to lifting the security barrier.

On average a vehicle will arrive on-site every ten minutes between the hours of 06:00 and 20:00. The staff car park is accessed through the same traffic system.

The site access gate is located approximately 14 m off the access road which enables any vehicle entering the site to drive completely off the public road thereby ensuring that there is no obstruction to the free flow of traffic on the access road.

Oxigen Environmental Ltd. have submitted a planning application to South Dublin County Council for the development of a new entrance at the north eastern boundary of the site (see Drawing D.1 and D.1.j). In the event that planning permission is granted then it is proposed to use a one-way traffic system within the facility. This system is detailed in Drawing D.1.j.

Attachment C
Discharges to Sewer – revised Table H.10

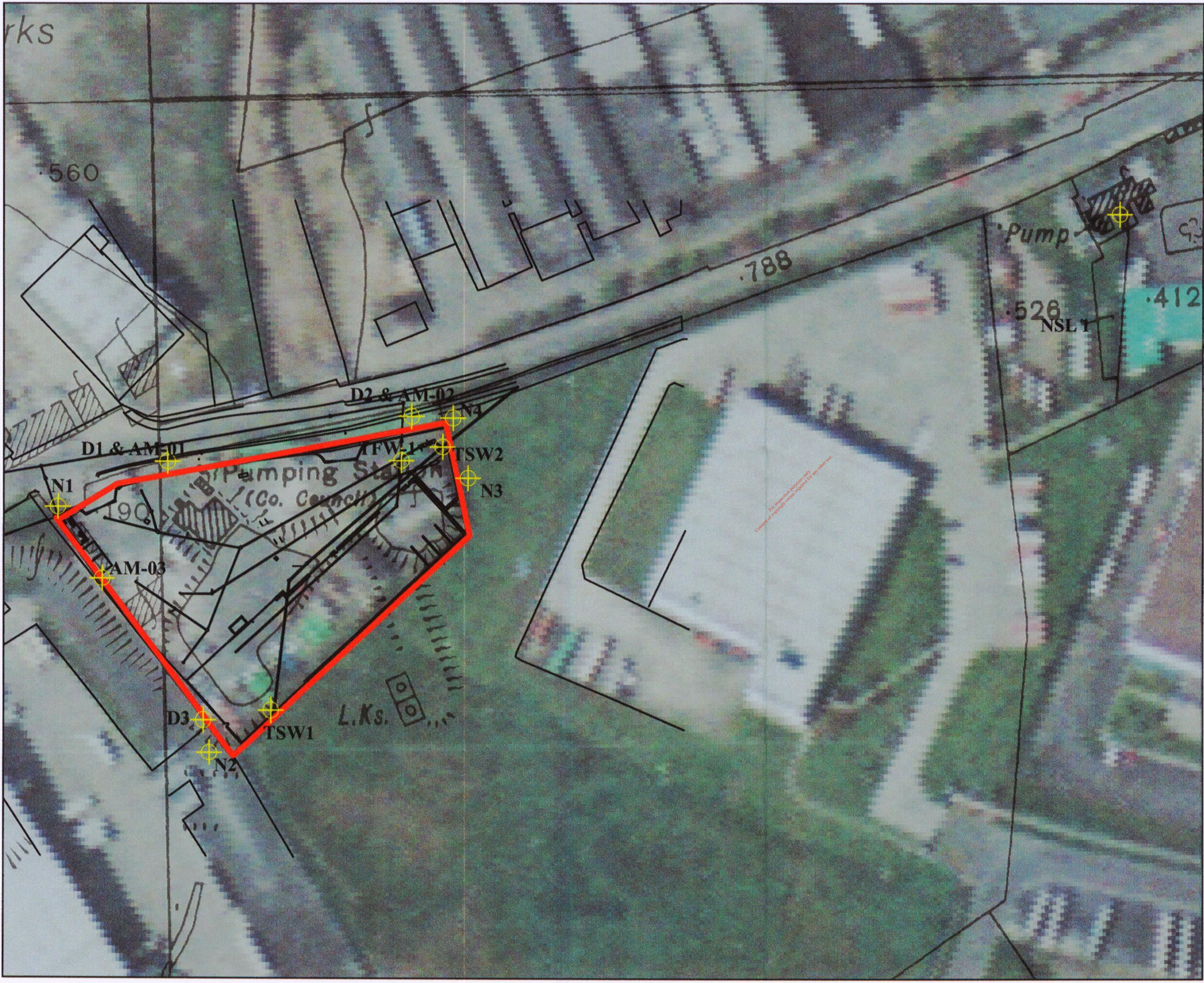
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Table H.10: DETAILS OF DISCHARGES TO SEWER
(ONE TABLE PER EMISSION POINT)

Emission Point Ref. N^o:	SFW-1		
Name of emission point:	Emissions to Foul Sewer		
Source of emission:	Process waste water		
Location of sewer connection:	Robinhood Road		
Grid Ref. (12 digit, 6E, 6N):	E309499, N231110		
Date of commencement:	28 th August 2004		
Name of sewer undertaker:	South Dublin County Council		
Periods of emission (avg.):	Not Known min/hr	24 hr/day	351 day/yr
Volume to be emitted:	Average/day:	1.64 m ³ /d	
	Maximum rate/hour:	0.10 m ³ /h	
	Maximum rate/day:	2.50 m ³ /d	
Name of receiving water:	Not Applicable		
Flow rate in receiving water:m ³ .sec ⁻¹ Dry Weather Flow		
m ³ .sec ⁻¹ 95%ile flow		
Available waste assimilative capacity:	kg/day		

Attachment D
Revised Environmental Monitoring Map (J.1 rev A)

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Grid References (Northings; Eastings)

Dust Monitoring Locations

D1	309454	231112
D2	309488	231118
D3	309421	231082

Foul Sewer Monitoring Location

TFW1	309478	231114
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Surface Water Monitoring Locations

TSW1	309466	231045
TSW2	309510	231114

Noise Monitoring Locations

N1	309427	231097
N2	309440	231057
N3	309489	231116
NSL1	309687	231174

Revision No.	Description	Date
A	Change TSW locations	June 2004

BORD NA MÓNA
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 Main Street, Newbridge, Co. Kildare.
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Client:
Oxygen Environmental Ltd.

Project:
Waste Licence Application,

Title:
Environmental Monitoring

Date: Feb 2005	Scale: 1:1,000 (A3)	Drawn by: NC	Drawn by: GL	Approved by: DH
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Status: Planning For Construction Tender As Built For Approval X	Drawing No.: J.1 (rev A)
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Attachment E
Emergency Response Procedure

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Emergency Response Procedure

Revision: 0.1

Date: 01/09/04

Preamble:

This document has been prepared by Oxigen Environmental (hereafter called 'the Company') to ensure safe and efficient handling of any and all emergency situations which may arise @;

*Robinhood Road
Clondalkin
D22.
(hereafter called 'the Facility').*

It is to be used in conjunction with the current revision of the Safety Statement. A pre-fire plan governing the current activities in the above referenced Facility is being implemented in conjunction with the local fire authority .

Should the substantive operation or purpose of the above mentioned this Facility alter in the future the Company shall revise this procedure and the pre-fire plan accordingly. The local fire authority shall be kept advised of such changes.

1 Purpose / Scope

The purpose of this document is to describe the methods employed by the Company in the event of an emergency arising at the Facility .

This method shall ensure;

- All emergencies are reported to the Company
- All emergencies are investigated
- All appropriate corrective action is implemented by the Company to prevent reoccurrence of the Emergency.

Issued on: 01/09/04	Approved by: Health & Safety Manager	Doc. No 88 Page 1 of 7
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- All actions and outputs from emergencies are reviewed at appropriate intervals to ensure their effectiveness

2 Definitions

For the purpose of this document an '*emergency*' shall be defined as;

- Complete breakdown of equipment or any other occurrence which results, or could result in the closure of the Facility.
- Any significant spillage occurring on site.
- Any fire at the Facility.

For the purposes of this document '*The Agency*' shall refer to the Environmental Protection Agency.

3 Records

Fire drill procedure

Hot-works procedure

Waste Transfer Docket (material being transported off-site).

Material Safety Data Sheets of all materials knowingly retained at the Facility

4 Procedure

4.1 Notification

All staff members are obliged to report every emergency situation to the Facility Manager or his/her deputy.

Depending on the nature of the emergency the Facility Manager or his/her deputy shall implement the appropriate corrective action as per section 4.3.

4.2 Incident investigation

Once the appropriate corrective action has been implemented, the Facility Manager shall carry out an incident investigation. To carry out this investigation the Facility Manager may enlist the assistance of any other staff member or external agent /consultant.

At a minimum this investigation shall include, and record;

- The time, date and exact location of the incident
- The nature, source and cause of the incident (where this cannot be determined immediately the steps taken to perform a more detailed analysis shall be detailed)

- Any potential emissions arising (where appropriate)
- Steps taken to isolate such emissions (where appropriate)
- Steps taken to minimise the effects of these emissions (where appropriate)

Once the investigation has been completed the Facility Manager shall present his/her findings to the Management of the Company. Based on the investigations findings measures shall be devised and implemented to prevent recurrence of the emergency. At this juncture any other corrective measures deemed appropriate shall also be devised and implemented.

All measures taken and the nature of the incident itself shall be reported to The Agency by the Facility Manager as per Condition 11.2 of Waste License 152-1.

4.3 Emergency type specific corrective action

4.3.1 Spillages

All spillages, however minor, must be reported to the Facility Manager, who will assess the situation and decide on a course of action. The main spillage risks come from:

Vehicles being repaired on the site
Storage tank leaking
Skips that contain oil products being tipped

The Facility Manager may delegate yard personnel to deal with the spillage, referring to the MSDS where appropriate. For spillages involving materials hazardous to health and the environment, the area is to be isolated with barrier tape to keep out unauthorised personnel.

The extent of the incident is quickly assessed and the fire alarm is sounded if deemed necessary.

The spilled chemical is identified and its associated hazards established. (This information is generally available from the MSDS or the container). The Facility Manager is consulted for specific hazard and clean-up information and any particular precautions, such as personal protective equipment.

Fire fighting equipment shall be retained on site for use in the event of a spillage of flammable chemical. All staff on site shall be trained in effective use of this equipment by an approved supplier. In the event of an evacuation the wind direction and speed to be assessed by the Facility

Manager personnel and where possible personnel evacuated upwind of the spillage.

If there is a risk of the spillage spreading and entering storm drains or the soil environment, it is contained using 'Oil dri' or any other suitable absorbent / containment material.

Spillage are prevented from entering a storm drain by using *Drizit* spill-stopper mats or any other suitable absorbent / containment material. If the spillage originates from a drum, it is positioned so that the ruptured section is at the top, thereby preventing further leakage. The ruptured drum is deposited into a salvage drum container, labelled and stored in the drum store.

The Facility Manager or his/her deputy shall ensure adequate quantities of 'Oil-Dri' and *Drizit* mats or any other suitable absorbent / containment material are retained on site . During normal operating circumstances adequate quantities shall be defined as 10 No. 5kg bags of *Oil Dry* and 6 No. *Drizit* spill -stopper mats.

Using a shovel and brush, absorbent chemical is transferred into a polyethylene lined drum or other suitable container and labelled correctly. This will be disposed of by an agency approved contractor.

The quantity of material spilled is estimated and the agency and Local Authority informed, if necessary, by the Facility Manager. An investigation report should be prepared on the spillage by the Facility Manager as per Section 4.2.

4.3.2 Breakdown / Restricted Access

The principal plant retained on site includes skips, skip collection vehicles, ejection trailers, telescopic handlers, track machines, one waste compactor, open top trailers and ancillary vehicles. Should any of these components of the operation be damaged or written off, operations would not be hampered to the extent that the facility would have to be closed.

In the unlikely event that the facility had to be closed for any other reason all operations would be run from the Oxigen Environmental North Eastern depot located at Coes Road Dundalk, Co. Louth.

4.3.3 Fire

4.3.3.1 Facility Fire prevention

Fire Safety Audits shall be conducted at the facility on a half yearly basis.

A fire drill procedure shall be implemented at the facility.

A hot-work permit procedure shall be implemented at the facility

Smoking shall be prohibited in the yard and sorting areas.

4.3.3.2 Staff Training & Fire fighting equipment

All staff and personnel at the facility shall be trained in general fire awareness and use of fire fighting equipment provided by an approved supplier.

For the purposes of fighting fires at the Facility the following shall be provided;

1 No. Bull-dog break glass alarm
1 No. 2kg CO ₂ extinguisher
1 No. 6 foam extinguisher
1 No. 50 L foam extinguisher (mobile)
4 No. 75m hose lengths
1 No. Bagnett key and bar set

All fire fighting equipment shall be serviced and maintained by an approved supplier on a six monthly basis.

4.3.3.3 The 'Fire team'

A 5 member 'fire team' shall be trained to deploy the fire hose from the hydrant located outside the main gate to the site of the fire within the facility. The purpose of this training is to assist the fire brigade on their arrival, facilitate the evacuation of the facility and minimise the need for fire water retention on site.

No staff member is obliged to fight a fire in the Facility.

4.3.3.4 On discovery of a fire

On discovery of a fire by any staff member the fire alarm must immediately sound the alarm.

All fires at the Facility must be immediately notified to the facility manager or his/her deputy.

The facility manager must immediately notify Dublin Fire Brigade and the Ambulance service should any personnel be injured on site. A list of emergency phone numbers shall be retained on site in a clear location.

All personnel (with the exception of the 'fire team') must immediately vacate the Facility as per the fire drill procedure, and in accordance with the fire action signs on the facility. All personnel must gather at the fire point located outside the Facility.

Once gathered at the fire point the Facility manager shall take a roll-call and await further instructions from the Fire Brigade.

No person (other than the 'Fire team') must re-enter the Facility unless the all-clear has been given by the Fire Brigade.

4.4 Review

On an annual basis, the Facility Manager shall convene a meeting with the Management of the Company. The agenda for this meeting, shall include, as a minimum;

- Details of all emergencies arising in the last twelve months
- Details of all corrective action implemented during the last twelve months
- A review of the effectiveness of all corrective actions implemented in the last twelve months
- Details of any further or amended corrective actions required

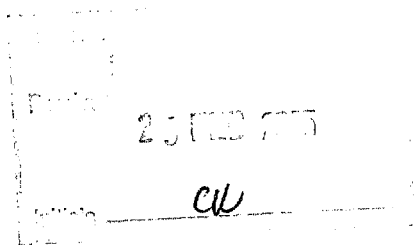
Outputs/directives from this meeting shall be made known to all relevant personnel by the Facility Manager

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**OXIGEN ENVIRONMENTAL LTD.,
(WASTE LICENCE REGISTER NO. 152-3)
WASTE BALING FACILITY,
ROBINHOOD INDUSTRIAL ESTATE,
ROBINHOOD ROAD,
BALLYMOUNT,
DUBLIN 22.**

ARTICLE 13 COMPLIANCE INFORMATION

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A Submission by Bord na Móna Environmental Ltd.
on behalf of Oxigen Environmental Ltd.

Detailed below is the information required for the Article 13 as requested in the correspondence received by the Environmental Protection Agency on the 8th February 2005.

Number 1 Size of development

The size of the proposed waste baling facility at the Robinhood Industrial Estate is 0.5 hectares (1.24 acres).

Number 2 Main Alternatives.

Oxigen Environmental Ltd. have addressed the waste facility requirements for the Dublin area, and assessed that there was a need for the development of a large scale baling facility that could meet the requirements of Oxigen Environmental Ltd. other facilities as well as the requirements of its existing client base. To this end Oxigen Environmental Ltd. assessed its existing facilities to determine the best site for both location and space. During this assessment Oxigen Environmental Ltd. purchased a large facility in the Ballymount Industrial Estate that would operate as a waste transfer facility. Through streamlining of its existing operations, Oxigen Environmental Ltd. was able to move the majority of the waste activities that were being undertaken at the Robinhood Industrial Estate facility to this larger facility. This left Oxigen Environmental Ltd with a facility that had a suitable location (adjacent to the Ballymount Industrial Estate site), excellent transport links (adjacent to the M50) and on-site infrastructure and space to operate the baling facility from this site.

It was therefore concluded that this site would be ideal and that no alternative site would be required to be sourced.

Number 3 Impact of Vibration.

Vibration impacts are not considered to be significant on-site. Traffic entering and within the site or plant machinery operating on-site do not give rise to any significant vibration effects. The main plant within the site would be the Harris Waste baler (HRB 45D), which is designed for the flat surface, reinforced slab concrete currently in place on the Robinhood Industrial Estate site. The balers operation is based on a steady compression ram which extends fully forward, compresses and retracts at a steady rate until a sufficient charge to form a bale is pushed into the compression chamber. This action would not result in a vibrational movement and therefore, vibration impact off-site is not likely to be of any significance.

Number 4 Difficulties

The main difficulty with generating the information required for the Waste Licence Application and subsequent EIS was encountered within the research into the Best Available Technologies that were available at the time. Oxigen Environmental Ltd. has committed a large volume of resources in identifying the different technologies available within Europe with a view to improving their waste services within Dublin, while adhering to the BAT principles as set out in legislation.

Number 5: Non Technical Summary

A revised non-technical summary for the Environmental Impact Statement can be found in Attachment A of this response.

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Attachment A
Revised Non-technical Summary

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***THE OPERATION OF A WASTE BALING
FACILITY BY***

OXIGEN ENVIRONMENTAL LTD.

AT

ROBINHOOD ROAD, DUBLIN 22

- An Environmental Impact Statement -

NON-TECHNICAL SUMMARY

Date:

February 2005

A Submission by Bord na Móna Environmental Limited on behalf of
Oxigen Environmental Ltd.



Oxigen

working for a cleaner environment

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1 INTRODUCTION

This Non-Technical Summary is a concise summation of the primary environmental aspects as outlined in the main Environmental Impact Statement.

Bord na Móna Technical Services was commissioned by Oxigen Environmental Ltd. to complete an Environmental Impact Statement to accompany an application for a review of an existing Waste Licence concerning a waste baling facility at Robinhood Road, Dublin 22.

2 PROJECT DESCRIPTION

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

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, recycling and baling) 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 household and commercial waste.

It is intended to upgrade the existing waste facility to a single treatment (i.e. baling of waste) waste facility at Robinhood Road, which will allow Oxigen Environmental Ltd. to provide the necessary service to its other waste facilities, as well as to Local Authorities and suitably permitted/licensed 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.

2.1 Site Description

The site was previously owned by South Dublin County Council, and was operated as a cleansing depot for County Council waste vehicles. The site was purchased by Oxigen Environmental Ltd. in 1999, and it was site was operated as a waste facility under a waste permit 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 December 2001, which permits the acceptance of commercial, industrial, household and construction and demolition waste, to a maximum volume of 24,600 tonnes per annum.

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’.

The site is located within the sub-catchment River Camac which is a tributary of the River Liffey. Surface water from the facility currently discharges into the South Dublin County Council surface water sewer, which serves the Robinhood Industrial Estate, via an oil interceptor and silt trap. This sewer discharges into the Ballymount Stream, which in turn discharges into the Camac River.

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.

Oxigen Environmental Ltd. assessed its existing facilities to determine the best site for both location and space for its proposed baling facility. Due to the consolidating of its existing operations, Oxigen Environmental Ltd. had a facility that had, in the site in Robinhood Industrial Estate, a suitable location (adjacent to the Ballymount Industrial Estate site), excellent transport links (adjacent to the M50) and on-site infrastructure and space to operate the baling facility from this site. Therefore it was deemed that this site was the most suitable for the proposed development.

2.2 Project Description

Oxigen Environmental Ltd waste baling facility will accept waste between 06:00 to 20:00 Monday to Saturday. Entry onto the site will be restricted to employees of Oxigen Environmental Ltd. and permitted/licenced waste contractors at all times during the operation of the facility. Outside the hours of traffic movements to the site (i.e. between 06:00 and 20:00), the gate will be closed and access is only permitted by the key personnel (i.e. site manager, waste processing building staff etc).

The waste that will be accepted at the site will be restricted to household and commercial waste. All wastes accepted on site will be inspected, with non-conforming, or dangerous (i.e. gas cylinders etc.) wastes removed prior to transferring the wastes to the baler. Any waste not deemed suitable for the baler shall be removed to the waste quarantine area. The wastes, that

are deemed to be in non-compliance with the relevant waste licence, upon inspection, are returned to source (if determinable) or stored within the bunded quarantine area prior to authorised disposal off-site.

A weighbridge currently exists at the entrance of the facility, which is linked to an automated software system, which records all data regarding incoming waste. It is proposed to install an additional site entrance at the facility (subject to planning permission), which will permit one way traffic movements within the site. The existing entrance (to the north west) will be used for entrance only to the facility, with the proposed entrance to be used as an exit only. A planning application has been submitted to South Dublin County Council (SD04A/488), with a decision on this application expected in November 2004.

The site is currently licenced (Waste Licence Reg. No. 152-1) to accept twenty four thousand and six hundred thousand tonnes of waste at the facility. It is proposed through this review to increase the volume of waste acceptable at the facility to one hundred and sixty thousand tonnes. It is emphasised that these quantities of waste do not represent the overall capacity of the waste baling plant.

Oxigen Environmental Ltd. have developed an Environmental Management System for the facility in accordance with the requirements of the existing waste licence (Reg. No. 152-1). Waste is delivered to the facility by Oxigen Environmental Ltd employees, County Council employees or by suitably permitted/licenced waste contractors.

Waste containers are visually inspected prior to its acceptance by the vehicle operator to ensure that the waste type is allowed to be accepted under the requirements of the waste licence. Prior to gaining access to the site the vehicle operator is required to provide the necessary information, such as the waste type, source of the waste, vehicle type, vehicle operators name, and any other relevant information deemed necessary by the weighbridge operator. The load will be required to be verified by the computer system prior to the barrier being raised.

The vehicle operator will be directed to the appropriate waste tipping area using a traffic light system. The vehicle operator will reverse into the required waste tipping area, where its load is deposited. If on initial inspection the load contains non conforming waste streams, the vehicle operator will be required to remove the entire load from the facility, prior to exiting the site. Once the waste has been tipped on the floor it is visually inspected prior to being transported to the on-site baler. This is to ensure that all non-conforming, or dangerous (i.e. gaseous cylinders), are removed from the waste load, and is immediately removed to the waste quarantine area. The waste is stored in the quarantine area pending its removal off site by the waste producer. In the event of the producer refusing to remove the waste, or the source of the waste is unknown, Oxigen Environmental Ltd will ensure that it is removed off

site and disposed of at an appropriate facility as soon as possible. Oxygen Environmental Ltd. will maintain records of the waste type, quantity, and ultimate disposal/treatment facility.

Outside waste acceptance hours the security gate is closed and access is only permitted by the key personnel (i.e. site manager, baling staff etc).

Raw materials used on-site for plant equipment and for vehicles are stored in either the bunded tank on site, or are located on portable bunds within the maintenance shed. All bunded units have their integrity tested every three years in accordance with the existing waste licence, to ensure compliance with industrial standards. (BS8007:1987).

The relevant waste disposal and waste recovery activities, as per the Third and Fourth Schedules of the Waste Management Act 1996, to which this application relates are:

Third Schedule - Waste Disposal Activities: Activities that occur onsite relevant to the Third Schedule are – ‘Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule’, ‘Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule’, and, ‘Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced’.

There are no activities within the Fourth Schedule of the Waste Management Act, 1996, that are applicable to this application.

3 ENVIRONMENTAL IMPACT STATEMENT

The environmental impacts of the waste transfer facility are described within the Environmental Impact Statement under the following categories:

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

In order to predict the likely impacts of the waste transfer operations on the site and its environs it was necessary to establish the existing baseline conditions in the area. To this end, a series of field investigations and desk based studies were initiated by technical staff by Bord na Móna

Technical Services from July to September 2004. These studies enabled an assessment of the environmental impacts, if any, that activities may have on the receiving water, soil and air environments.

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3.0 IMPACTS OF THE WASTE BALING FACILITY

3.1 Human Beings

3.1.1 Noise

Noise is an identified form of air pollution and uncontrolled it can cause nuisance or a deterioration of amenities and the quality of human life. The potential impact of the waste baling facility on noise levels within the area is associated with the noise generated through on-site activities. It is concluded however that the proposed change in site operations will not significantly increase the existing ambient noise levels and specifically, noise levels at the nearest sensitive location (occupied residential premises) will not significantly deviate above existing daytime noise levels.

3.1.2 Traffic

The traffic impact study assessed the potential impacts of additional traffic movements generated during the operation of the waste baling facility and the local road networks.

This assessment concluded that the proposed development will not have a significant adverse impact on the road network. In particular, proposed road improvements on the Robinhood Road by the County Council will ensure that the existing and proposed road network can accommodate the likely levels of future year's traffic.

3.1.3 Human Health

A number of air pollutants have known or suspected harmful effects on human health and the environment. In many areas these pollutants are principally the products of combustion from space heating, power generation or from motor vehicle traffic. The air pollutants derived from the proposed extraction activities can be separated into traffic derived emissions and extraction derived dust emissions. Traffic derived primary pollutants include the following species; sulphur dioxide (SO₂), particulate matter, lead, oxides of nitrogen (NO_x), carbon monoxide (CO) and volatile organic compounds (VOCs).

While the levels of traffic derived pollutants may increase as a result of a general increase in traffic along the existing road network, however due to the minimal increase in traffic volumes, and the existing large volumes of traffic within the busy industrial estate it is anticipated that the impact of the traffic will be negligible.

Dust emissions from the operations of the facility will be minimised by careful on site management. This will ensure that potential problems with fugitive dust emissions from the site will be negligible.

3.1.4 Site Structure / Land Use

Any potential impacts of the facility on the existing structural and land usage of the area are considered insignificant. Land usage in the vicinity of the facility consists of large and medium size industrial units. 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'.

3.1.5 Socio-Economic

The waste baling facility at Robinhood Road will have minimal social and economic impacts as summarised below:

1. It is considered likely that the operation of the facility will have minimal impacts on the existing population structure of the area. The job creation benefits are secondary to the development, as it is the service provided that will benefit the local and regional waste collection and disposal infrastructure.
2. Service required (electricity, water supply, etc.) of the facility will be obtained through existing service lines. The demand/usage of these supplies during normal working conditions will be low and should not place the current network under stress.

3.2 Flora & Fauna

The site is currently covered in hardstand, and as such there are no habitats located within the site boundary. The site is not designated as a Natural Heritage Area or a Special Protection Area under the Birds Directive (79/409/EEC) or as a Special Area of Conservation in accordance with the habitats Directive (92/43/EEC) nor is it designated under any of the other nature conservation designations currently used. The site is not considered important for any mammal or avian species.

3.3 Soil & Geology

Desk-based information relating to the substrata underlying the site of the proposed development was obtained through the Geological Survey of Ireland (GSI), Environmental Protection Agency (EPA) and from information held on file within Bord na Móna Technical Services.

The site is located within an industrial business park area, and has been used for waste activities since 1999. Prior to this the lands were occupied by the County Council, which

utilised the site as a washing area and a pumping station. Historic quarrying activities have occurred on the lands adjoining the site, prior to the 1940's. The extent of this quarrying is unknown and the lands were subsequently back filled. As a result of this, the subsoil beneath the site may have been alternated.

Historic geological maps of the area, identify the natural Quaternary sediments underlying the site as glacial tills which vary from loose aggregate to the firm sandy gravely clays (Dublin Till).

Published Geological data of the study area identify the bedrock geology as the Calp Limestones of Lower Carboniferous period.

Mitigation Measures

All wastes and fuels will be stored in fully bunded areas in accordance with relevant environmental guidelines and recognised standards. All bunds will be tested in accordance with the waste licence conditions. In addition, oil absorbent materials will be kept on site in close proximity to any fuel storage tanks or bowsers during site development works. The refuelling of vehicles will be undertaken in a designated area, which will be fully contained to prevent spillage into the surface water network.

All wastes being delivered to or removed from site will be loaded/unloaded in fully bunded areas.

3.4 Hydrology

The study area is located within the EPA Hydrometric Area No. 9, namely the River Liffey catchment. Within the Liffey catchment the site lies in the sub-catchment of the River Camac. There are no existing surface water bodies on-site. All surface water run-off from the site discharges to a surface water sewer serving the Robinhood Industrial Estate which ultimately discharges to the River Camac.

The site currently drains to a surface water sewer which is located beneath the site and travels along the Robinhood Road. This surface water sewer also takes surface waters from numerous other premises within the industrial estate. The surface water sewer discharges to the Robinhood Stream, which discharges into the Camac River, which is a tributary of the River Liffey.

Potential Impacts of the Proposed development

1. Surface water from hardstanding areas will pass through an oil interceptor prior to discharge to the surface water sewer and subsequently to the Robinhood Stream.

Given that all waste loading/unloading take place within bunded areas the potential for spillages to impact on surface water quality is considered to be low.

2. Leachate and process wastewater will be discharged directly to the foul sewer, and will not enter the surface water drainage network.

Mitigation Measures

An oil interceptor with a manual shut-off valve has been placed on the surface water drainage system which minimises the potential for hydrocarbon emissions to surface water. All loading/unloading will take place in bunded areas which will reduce the potential for spillages to occur.

Separate surface water and foul sewage drainage systems have been installed in accordance with building standards. This eliminates the potential for any interaction between surface water and foul sewage. All below ground drainage will be designed, detailed and constructed in accordance with good practice in hydraulics and in compliance with relevant British and Irish Standards and Local Authority requirements.

All newly constructed and existing drains within or near to the development site are to be cleared on completion of works by power jetting and all drains to be CCTV surveyed to ensure removal of construction spill and sediment.

3.5 Hydrogeology

Desk-based and site specific information on the underlying hydrogeological characteristics of the site was obtained through the following:

- Research review of data held within the Geological Survey of Ireland;
- Research review of data held within the Environmental Protection Agency

The site is underlain by Lower Carboniferous rock consisting of the Calp Limestones (CD). These have been provisionally classified by the GSI as a *Bedrock Aquifer which is moderately productive only in local zones (L1)*. Groundwater vulnerability classification are currently being produced by the GSI for County Dublin. As part of this study, guidelines published by the GSI for mapping vulnerability were used to define and classify the site. Using GSI criteria for groundwater vulnerability the site has a high - moderate vulnerability rating.

There are no groundwater monitoring boreholes on the site and there were no intrusive investigations carried out as part of this assessment. Groundwater is reportedly flowing in a southeast to northwest direction towards nearby surface waters.

The site and its immediate surrounds have been historically used for quarrying activities, which have been subsequently restored (backfilled). The nature and extent of the quarrying activities are unknown at this time and as such there is the potential for previous contamination of the subsurface.

Potential Impacts of the Proposed Development

There will be no direct discharges to groundwater or any groundwater abstractions as part of the proposed development.

Currently the development is constructed with a hardstand cover over the entire site. There will be no direct discharges to the groundwater as part of this development and it is therefore considered that there will be no impacts to the underlying groundwaters.

Mitigation Measures

There will be no emissions to groundwater from the proposed development. All wastes and other consumables will be stored in bunded areas.

Potential leachate from the handling of wastes within the building will be collected within a dedicated drainage system and discharged to foul sewer. This will minimise the potential for indirect emissions i.e. leaks to impact on groundwater quality.

3.6 Air

To determine the baseline air quality and subsequently assess the potential impact of the operation of the facility the following approach was taken:

- identification of the potential pollutants
- monitoring of pollutants to assess the current baseline air quality levels
- discussion of the potential impact to air quality during the operation
- predictive modelling of the impact of traffic derived pollutants on air quality
- mitigation measures to minimise these potential impacts.

The following components were identified as potential pollutants and were therefore, included in the assessment: sulphur dioxide (SO₂), oxides of nitrogen (NO_x), volatile organic compounds (BTEX) and particulate matter.

The baseline monitoring survey carried out during May 2004 shown that pollutant concentrations (NO₂, SO₂, BTEX and particulate matter) obtained are well below their respective limits or guidelines and are indicative of a rural environment.

Potential Impact of the Proposed development

1. Generation of dust; Dust is likely to be generated due to the movement of traffic and general on-site operations.

2. Traffic pollutants; The movement of construction vehicles and the use of generators at the site during the construction phase of the development will generate exhaust fumes and subsequently contribute to potential emissions of SO₂, NO_x, CO, particulate matter and VOC's including BTEX.

Mitigation Measures

1. Generation of dust: Dust will be minimised due to good site management practises, such as restricting the tipping of all waste within the waste processing building etc.
2. Traffic pollutants; The use of on-site vehicles and movement of waste truck will be operated using good site practices such as all vehicles will be switched off when not in use to eliminate any unnecessary emissions.

3.7 Noise

As part of the existing waste licence (Register No. 152-1), Oxygen Environmental Ltd. have undertaken annual noise monitoring. These results were used to determine the impact of the existing waste activities on the noise levels within the vicinity of the facility. It was determined from this assessment that the main contributor to the noise levels within this area is the traffic volumes on the Robinhood Road, and the contribution from the waste activities on site would be less significant. The noise sensitive locations recorded noise levels typical of busy industrialised areas with the dominant source being traffic.

Due to the current site infrastructure in place and the steady operation of the plant on site it is deemed that there will be no significant impact of vibration on off-site sources.

Potential Impacts of the proposed development

Use of machinery; it is anticipated that there will be an increase in traffic volumes on the site, including the operation of a number of on-site vehicles for the operation of the facility.

Mitigation Measures

Use of machinery; During the operational phase several measures will be enforced to reduce the potential noise impact. These include: proper training of on site personnel in the minimising of noise generation, correct maintenance of on site plant machinery and monitoring of noise levels to comply with these control measures.

3.8 Traffic

The site is located approximately 0.5 km east of the M50 motorway, southeast of the Red Cow Roundabout. The site is bordered to the north by Robinhood Road, and is located on a brownfield site that was previously operated as County Council cleansing depot. The proposed review of on site operations will use the existing entrance to the site, however it is

proposed to construct an additional entrance to the east of the facility. Oxigen Environmental Ltd. have submitted to South Dublin County Council a planning application (SD04A/0488) for this entrance. The site is bordered on all three remaining sides by industrial units. It is estimated that a maximum of 130 total (i.e. 65 inbound and 65 outbound) traffic movements a day will be generated from the proposed review of on-site activities.

Potential Impacts of the proposed review of on-site operations

1. Generation of traffic; It is anticipated that there will be 130 traffic movements a day at the site, which will have a minimal effect on the existing traffic network.
2. Atmospheric Emissions; Atmospheric emissions will be generated by the traffic entering and exiting the site (as detailed in the air section above).
3. Generation of nuisance; Mud may be accumulated on the road due to the movement of trucks

Mitigation Measures

1. Traffic entering and exiting the site will not be permitted to park on the public roadway or to impede the free flow of traffic on the adjoining road network. The entrance weighbridge is located 24m from the edge of Robinhood Road which allows sufficient space for two waste delivery trucks to park at the entrance without backing up onto the public road while a third truck is being weighed on the weighbridge.
2. A daily inspection of the industrial estate roads adjacent to the site will be undertaken and in the event of significant quantities of mud on the road, the road shall be swept accordingly.
3. Cognisance has been taken of the intended road widening on Robinhood Road. The intended road widening by SDCC will also help in the free flow of traffic on Robinhood Road.

3.9 Climatic Factors

The climate of the proposed development site is characterised as follows:

- prevailing wind is predominantly south-westerly;
- wind conditions do not vary greatly over the entire year (3 m/s);
- long term monthly mean precipitation ranging from 53 mm to 84 mm;
- Ambient air temperatures ranging from 4.6 °C to 14.9 °C.

It is not considered that the development will have any impact on the climate in this area.

3.10 Landscape and Visual Impacts

The site is located within a predominantly flat landscape, and is bordered on three sides by industrial units. The significance of the impact is rated as Imperceptible i.e. “An impact capable of measurement but without noticeable consequences” (EPA Guidelines on Information to be contained in EIS).

Potential Impact of the proposed development

It is deemed that as the proposed change in use and increase in the volume of waste throughput will occur on the existing site, with the only change attributed to an additional entrance, the landscape and visual impact are negligible.

Mitigation Measures

It is deemed that no mitigation measures in terms of landscape and visual impacts are required for the proposed development at this time.

3.11 Cultural Heritage

A Cultural Heritage Assessment that was carried out on the area identified that the nearest historical site is located over 250 m from the facility. There were no features or events of historical interest revealed during research into the local history of the townland.

During any proposed groundworks operations at the site an qualified archaeologist will be required to be on site to oversee operations. It is not, therefore, considered that the development will have any impact on the cultural heritage in this area.

3.12 MATERIAL ASSETS

It is contended that the material asset values of the surrounding area will not be significantly affected by the waste baling facility as the environmental impacts (air, noise and water pollution, visual intrusion, traffic impacts) of the proposed activity are shown to be minimal.

4.0 CONCLUSIONS

In summary, it is contended that the negative impacts of the waste baling facility can be minimised or eliminated by adherence to the mitigation measures. The Environmental Impact Statement, therefore, shows that no significant adverse effect on the environment should occur as a result of the operation of the facility