

1. INTRODUCTION

1.1 Overview of the Proposed Development

Seamus A. Kelly & Sons (SK&S) operates a waste transfer station at Gorey Business Park, Ramstown, Gorey Co. Wexford.

SK&S operates a collection service for commercial, domestic and construction and demolition waste which services the South East. SK&S provides a progressive service in terms of waste management to the population of the South East area. The business, operates from the Company's transfer station at Gorey Business Park, Ramstown, Gorey, Co. Wexford. The company has provided a waste disposal service to the South East for over 8 years. The SK&S facility currently handles an estimated 16,500 tonnes per annum of non-hazardous waste. The waste is delivered to the SK&S facility where recyclables such as steel and wood are segregated with the residual non-recyclable waste being transferred to landfill. SK&S has also commenced supplying householders in the South East Region with bins for the collection of dry recyclables. The company has plans to expand this service significantly in the future.

SK&S is optimistic that it can expand its business and operations and is now applying to the Environmental Protection Agency (EPA) for a licence to handle 30,000 tonnes of waste in 2008 at the Ramstown facility. This Environmental Impact Statement (EIS) has been produced to accompany that licence as required under Article 13(1) of S.I No. 133 of 1997.

This Environmental Impact Statement (EIS) examines the potential impacts and significant effects on the environment of SK&S's existing waste recycling station at Ramstown and the predicted impacts and significant effects of any proposed extension/upgrading to the facility. The prescribed developments that require an EIS are set out in Section 176 of the Waste Management Act and Article 93 and Schedule 5 of the Local Government (Planning and Development) Regulations, 2001.

1.2 Location and Setting

The location of the site is shown in Figure 1.1.1 and has a National Grid Reference of 3156E, 1586N.

The existing site covers an area of 0.28 hectares and is located in the Gorey Business Park, Ramstown, Gorey, Co. Wexford in the town land of Ramstown. This area lies within the local authority jurisdiction of Wexford County Council.

The Banoge River lies approximately 1.4km to the south-east of the site and branches off in to tributaries to the east of the site. The business park is bounded to the west by the N11 a major

commuter route running in a north-east, south-westerly direction approximately 300m to the west of the facility.

Surrounding activity is primarily industrial and commercial, as would be expected in a business park. However, there are three residential dwellings located within 200m of the site. The surrounding environment is dominated by farmland with passing heavy commercial traffic.

The site is outlined in red on Figure 1.1.2. SK&S own all of the lands outlined in red on this drawing.

1.3 Site Facilities

The existing facility contains the following infrastructure:

- Recycling building including maintenance garage,
- Waste storage bays,
- Site offices,
- Toilets,
- Canteen,
- Locker Room,
- Concrete yard,
- Fuel storage area,
- Underground Storage Tank,
- Car parking area,
- Weighbridge.

Site operations are primarily concerned with segregation of materials for recycling. Recyclables are manually removed from commercial, industrial, institutional and skip waste and the residual fraction sent to landfill for disposal.

The main features of the expanded facility are as follows:

- New Recycling Building to cover entire yard
- Ancillary features including roads and surface water drainage

1.4 Infrastructure

The road network is described briefly in Section 1.2 above and in greater detail in Section 2.9. Other infrastructure currently in place at the existing waste management centre includes the following :

- three phase electricity,

- telecommunications infrastructure,
- water mains,
- stormwater drains, and
- foul sewerage.

1.5 Planning Context.

SK&S have operated a waste management business from these premises since 1995 under planning permission granted by Wexford County Council (Ref. 950081) which was granted to the previous owner. The immediate receiving environment for the facility is zoned 'industrial' in the Wexford County Development Plan. SK&S is now applying for permission to construct a new recycling building on-site which will enclose the entire yard area.

Waste management centres, such as the SK&S facility, are an important focus in the waste management infrastructure for the South East Region. These facilities have a dual function. The primary function is to remove recyclable material from the waste stream as the first step in the recycling process. The second function is to bulk-up non-recyclable waste onto large bulk haulage trailers to reduce the number of vehicles travelling to disposal facilities. The most suitable locations for these hubs are in industrial areas within the county with easy access to the national primary road network. The SK&S site fits well with this description and is therefore considered a very suitable location for this particular type of activity.

SK&S are currently applying to Wexford County Council for planning permission to construct a new recycling building which will cover the entire yard area. This EIS will accompany the Planning Permission and the Waste Licence Application.

1.6 Waste Policies

1.6.1 EU Policy

Sixth Environment Action Programme

The current and proposed SK&S projects are consistent with the objectives and targets of the Sixth Environmental Action Programme '*Environment 2010: Our Future, Our choice*'. For wastes that are generated the Programme seeks to achieve a situation where:

- The wastes are non-hazardous or at least present only very low risks to the environment and our health;
- The majority of the wastes are either reintroduced into the economic cycle, especially by recycling, or are returned to the environment in a useful or harmless form;
- The quantities of waste that still need to go to final disposal are reduced to an absolute minimum and are safely destroyed or disposed of
- Waste is treated as closely as possible to where it is generated.

The targets outlined in the Programme are as follows:

- Reduce the quantity of waste going to final disposal by around 20% by 2010 compared to 2000, and in the order to 50% by 2050;
- Reduce the volumes of hazardous waste generated by around 20% by 2010 compared to 2000, and in the order to 50% by 2050.

The high degree of recycling achieved at SK&S to date, demonstrates the Company's commitment to achieving these targets. SK&S's proposals to expand the existing facility prove its ongoing dedication to recycling and thereby reducing the amount of waste being consigned to landfill.

1.6.2 EU Legislation

The project will help meet the targets set out for the recovery and recycling of packaging waste set out in the EU Directive on Packaging and Packaging Waste (4/62/EEC). Packaging waste has been highlighted as a 'priority waste stream' at EU level. In turn, the facility will help meet the requirements of Irish legislation as laid down in the Packaging Regulations (1997 and 2002). It will also help achieve the objectives of the landfill directive which proposes that by 2010 the amount of biodegradable waste going to landfill will be reduced by 25% on 1993 levels.

1.6.3 National Strategy Context

The project is consistent with the objectives as outlined in *Changing Our Ways*. National waste management strategy in Ireland is outlined in the policy statement entitled '*Changing Our Ways*' published in September 1998 by the Department of Environment and Local Government. The documents outlines Government policy objectives for managing waste from 1998 to 2013. '*Changing Our Ways*' recognises the role of private sector companies, such as SK&S, in the provision of waste management infrastructure. Section 5.4.1 of the document states:

"There is considerable scope for increased participation by the private sector in all areas of waste management in Ireland, and authorities should encourage and facilitate business involvement in the provision of waste management services. Private participation can contribute much needed capital investment in infrastructure, specialist expertise in the application of alternative and emerging technologies, a better understanding of the dynamics of the marketplace, especially in relation to recyclable, and in some cases greater operation efficiency and flexibility."

SK&S has significant experience in the field of waste management. The company's application to the EPA for a waste licence to operate a recycling and waste transfer station has demonstrated its commitment to the achievement of government policy.

'Changing Our Ways' proposes that:

- 50% of household waste is diverted away from landfill
- Recycling of 35% of municipal waste
- Development of waste recovery facilities as an alternative to landfill
- Recycling of at least 50% of construction and demolition waste within 5 years with a progressive increase to at least 85% over 15 years

The SK&S facility will help to meet these targets within a regional context. The facility is equipped with the best available recycling technology to remove and segregate recyclable material.

The latest Government policy statement is entitled '*Delivering Change*' which outlines the structures and initiatives that will be put in place to underpin the policy. Section 5.1 of the document identifies four key areas that have to be addressed is Ireland's recycling performance is to be improved, namely:

- Better separation and sorting of waste at source, allied to segregated collection, to provide cleaner waste fractions and single material waste streams
- Provision of an adequate infrastructure for the collection and management of waste arisings
- Greater reprocessing capacity to convert waste into usable products or raw materials; and
- Generation of markets and improved demand for recycled or recyclable materials, especially in the manufacturing and construction sectors.

Both the existing and proposed facilities are in line with the above objectives. The proposed expanded facility will allow for segregation of greater volumes of all wastes including the priority waste streams of construction and demolition waste and packaging wastes. The Company's experience in developing markets for recycled materials will also prove an advantage in terms of the above objectives.

1.6.4 Regional Strategy

In terms of waste management planning Ireland is divided into a number of regions, each of which has devised waste management strategies and plans to assist in providing a co-ordinated approach to all aspects of waste management. The SK&S site is located in the South East Region which consists of the Counties Wexford, Carlow, Kilkenny, Waterford and Tipperary (S.R.). The 'Waste Management Plan for the South East Region' was adopted by all of the four local authorities in July 2002. The Plan is grounded on National Policy and EU principles and it includes policies on :

- waste minimisation,

- waste collection,
- waste recycling,
- energy recovery,
- agricultural wastes,
- disposal, and
- hazardous waste.

The primary objective of the Plan is the diversion of waste from landfill. In other words, the Region needs to prevent and minimise waste and where this is not possible, it needs to recycle more and dispose less. The individual policies outlined point towards increase recycling of all types of waste.

Section 8.3 of the plan reiterates the importance of private sector involvement (as stated in *Changing Our Ways*) in the provision of waste management facilities in the region.

Section 16 of the Plan outlines the potential roles of the private sector in the region. One of the options outlined: Design, Build, Finance & Operate (DBFO), is the preferred option for SK&S.

The importance of the implementation of a 2-Bin collection system for the dry recyclable fraction of domestic waste is emphasised in Section 12.2.1 of the Plan. The SK&S facility is currently providing this service in the region and hopes to extend this service over time.

The plan suggests four waste management scenarios for the region. Following an environmental assessment, the fourth scenario was chosen as the recommended strategy. The strategy recommends:

'Maximum realistic recovery/recycling with full range treatment systems including materials recovery, biological treatment, thermal treatment with energy recovery and residual landfill'.

The proposed SK&S facility will dovetail with the aims and objectives of the Plan by providing much needed additional recycling capacity for the South East Region. SK&S intend to provide recycling capacity for a wide range of materials. The facility is designed to allow process flexibility as the market for recycled materials changes.

1.7 Alternatives

1.7.1 Alternative Waste Management Practices

'Changing Our Ways' discussed in 1.6.1 above outlines our National objectives for the management of waste for a fifteen year period from 1998. These objectives are based on the internationally recognised hierarchy of waste management options, i.e.:

- prevention
- minimisation
- reuse/recycling
- energy recovery
- disposal

where the most favourable option is prevention and the least favourable is disposal. SK&S are not waste producers and therefore has no opportunity to prevent or minimise waste. The Company encourages its commercial and industrial clients to segregate recyclables at source to minimise cross-contamination of materials and thereby maximise the recycling potential of these waste streams

As there are no existing large scale energy recovery facilities in Ireland, the residual and non-recyclable waste from the SK&S site will continue to be transported to landfills in the surrounding region.

1.7.2 Alternative Sites

The facility is industrial by nature and ideally should be located in an industrial estate. The three most important criteria in locating a waste management centre such as this are:

- proximity to waste arisings,
- access to recycling markets, and
- access to disposal facilities.

The waste management centre primarily serves commerce, industry and households in the Gorey and Wexford area. Its location in an industrial estate on the edge of the N11 is well positioned for this purpose.

The location of recycling markets serving the South East Region is varied. Reprocessing facilities used by waste management companies in Ireland include the following:

- Paper & Cardboard – Dilloan Recycling, Dundalk and Country Recycling (UK) Ltd c/o Eurokey Recycling, Leicester.
- Glass – M.S.M. Recycling, Mountmellick, Co Laois.
- Wood – Garden mulch, horsepaths.
- Waste Oil - Atlas Oil Ireland, Portlaoise, Co. Laois.
- Metals – John Molloy, Ballycarney, Co. Wexford.
- Batteries – Returnbatt, Co. Kildare.

The location of recycling markets is varied and dynamic and siting a waste management centre based on markets alone is impossible.

Disposal facilities for residual waste from waste management centres in the South East Region include the following:

- Killurin Landfill Site, Newtown Lower, Killurin, Co. Wexford,
- Powerstown Landfill, Co. Carlow,
- Dunmore, Co. Kilkenny.

In summary, the siting of the SK&S facility in an industrial estate with good access to national primary routes is considered a very favourable location for a waste management centre.

1.7.3 The Do-Nothing Alternative

If SK&S did not exist the wastes handled at the site would be transported directly to landfill in refuse collection vehicles, skip lorries, commercial vans and private cars. This would have an impact in terms of traffic volumes and consequently the use of fossil fuels by these vehicles. An additional consequence would be the loss of an opportunity to recycle an enormous quantity of waste material. This would hinder the national and regional strategies, which promote recycling.

1.8 Requirement for an EIS

This Environmental Impact Statement has been prepared to accompany an application to the EPA for a review of Waste Licence No. 95-1 in accordance with the Waste Management Act, 1996.

The EIS has been prepared in accordance with the requirements of the following statutory documents:

- (i) The European Community Directive on Environmental Impact Assessment (No. 85/337/EEC), as amended by Directive 97/11/EC.
- (ii) The European Communities (Environmental Impact Assessment) Regulations, 1989 to 1999.
- (iii) The Local Government (Planning & Development) Regulations, 1994 (S. I. No. 86/1994), as amended.
- (iv) The Local Government (Planning & Development) Regulations, 1999 (S. I. No. 92/1999).
- (v) The Local Government (Planning & Development) Regulations, 2001

1.9 Structure of the EIS

The EIS is presented in the "Direct Format Structure" as set down in the Draft Guidelines produced by the Environmental Protection Agency (EPA-1997). In general, it follows the framework presented in the EPA Advice Notes on Current Practice in the Preparation of Environmental Impact Statements. The structure employed allows individual examination of the main components of the EIS, namely:

- (i) the receiving (existing) environment (Section 2).
- (ii) the proposed development (Section 3).
- (iii) environmental impacts and mitigation measures (Section 4).

1.10 Contributors to the EIS

This EIS was prepared by a number of consulting firms. The members of the study team and their respective inputs are as follows:

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1.11 Scoping of the EIS

The study team has taken on board any environmental concerns or issues during the licensing process.

1.12 Data Necessary to Identify and Assess Environmental Effects of Development

The data necessary to identify and assess the environmental effects of the development are:

- the existing environment, as described in Section 2 by the specialists in various fields,
- the characteristics of the development as described in Section 3, including its physical dimensions, volumes and nature of materials being handled, the processes involved and the emissions from the facility.
- the potential environmental effects of the project are assessed and proposed mitigation measures are presented in Section 4.

1.13 Difficulties Compiling Specified Information

Baseline information for the development site and its environs was readily compiled by the EIS contributors and no such difficulties were encountered.

1.14 Forecasting Methods used to Assess the Effects on the Environment

The methods employed to forecast the effects on the various aspects of the environment are standard techniques used in the professional disciplines. The general procedure employed was to describe the receiving environment in a dynamic fashion, to add to that a projection of the "loading" placed on all aspects of the environment by the development in its mitigated form and thereby arrive at the net likely significant effect of the development on the environment.