



Environmental Protection Agency  
*An Ghníomhaireacht um Chaomhnú Comhshaoil*

Mr Seamus Kelly

"Amberlea"  
Courtnacuddy  
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16/08/2004

202-1/Art14(2)(b)(ii)01BM

Re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management  
(Licensing) Regulations

Dear Mr Kelly,

I am to refer to the above referenced application for a waste licence relating to a facility at Seamus Kelly & Sons, Gorey Business Park, Ramstown, Gorey, Co Wexford. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

**ARTICLE 12 COMPLIANCE REQUIREMENTS**

**B6 Type of Activity**

1. Provide a detailed description of the proposed activities specified as class 12 of the Third Schedule of the Waste Management Act, 1996. In addition, provide a detailed description of the proposed activities specified as Classes 11 and 12 of the Fourth Schedule of the Waste Management Act, 1996.

**C1 Air**

1. Provide monitoring results for dust deposition and a full interpretation of these results for dust monitoring locations D1 and D2 and a further dust monitoring location on the western boundary wall.



## **C6 Hydrogeology**

1. Section 3.2.11 of the EIS - *All Services* – states that 'Water is supplied by a private well on site'. Please provide a sample analysis of water from the on site well to include all the parameters shown on Table 1.5 'Groundwater Quality' of the application form.

## **C8 Noise**

1. Provide a new survey of daytime noise levels, to be carried out at:
  - the northwestern, western and southern boundaries of the site; and at
  - a further location outside the eastern site boundary; and ,
  - at all noise sensitive locations identified within 1km radius of site.The survey should be carried out while the plant at the facility are operational.
2. Provide a map clearly showing
  - the noise monitoring locations,
  - the location of all residential buildings and
  - any other Noise Sensitive Locations (NSLs), within 1km radius of site.Include the location of the noise sensitive location N1, referred to in the text of Section 2.3.4.1 of the EIS.
3. The noise results and frequency spectra provided in Appendix 2.3.1 show a tonal noise element at several frequencies at locations N1. Please provide a frequency spectrum of noise measurements taken at boundary locations (NW, W and S boundary wall) and a separate frequency spectrum of noise measurements taken at NSLs in order to eliminate the Waste Transfer Facility as the source of the tonal element in the noise character. Please refer to the EPA's Guidance document 'Environmental Noise Survey'
4. Please indicate why all Noise Sensitive Locations monitored are regarded as being noise sensitive.

## **C9 Surface Water**

1. Provide surface water monitoring results and a full interpretation of these results at the surface water discharge point at the site entrance.

## **D1 Site Infrastructure**

1. Provide details of fuel storage bunding design. Include details on the drainage arrangement at the fuel dispensing area and specify how leaks/spillages are handled particularly during fuel dispensing.
2. Revise Figure No 2.6.1 (*Site Drainage*) to show the proposed drainage system for the waste transfer station. The revised drawing should show the source (e.g. toilets, canteen, shredder, floor wash, etc) of all waste water and surface water run off generated within the facility, foul water underground storage tanks,

manholes and 'acodrains' as well as pipework to which it connects, including diameter.

3. Section 3.2.7 of the EIS states '*Fuel is stored in 2 plastic tanks ....the tanks include 2(No.) 1,000 litre tanks and 1 (No.) 1,300 litre tank*', i.e. 3 tanks. Please clarify the number of fuel tanks and the quantity of fuel stored on site.
4. According to section 3.2.12 of the EIS, *Sewerage and surface water drainage infrastructure*, foul water in the loading pit is collected in a sump, how is foul water which accumulates elsewhere on site and in particular within recycling building directed, to the storage tanks?

## **D2 Facility Operation**

1. Figure No 3.3.1, *Process Flow Chart*, shows arrows labelled:
  - 'Cardboard, Plastic, Cans' going from 'Waste Transfer' to 'Segregation, Recovery, Baling and Storage';
  - 'Cardboard, Plastic, Cans, Textiles' going to and from 'C&D waste Recovery' and 'Segregation, Recovery, Baling and Storage'.Please explain/clarify and if appropriate, update and revise Figure No 3.3.1, *Process Flow Chart*, accordingly.

## **H1 Air**

2. Specify the mitigation measures that will be employed in the event of rising dust levels as referred to in Section 3.10.3

## **J5 Discharge to Sewer**

1. Estimate the quantity of waste water effluent arising from the toilet, canteen, floor wash, floor wash, shredder and vehicle wash bay etc Complete Table H.10 '*Details of Discharges to Sewer*' of the application form for each discharge point.
2. Supply an estimate of the volume to be discharged from the facility, to the foul water holding tanks, per day, including minimum and maximum figures.
3. Section 3.2.12 of the EIS states foul water generated on site is currently held in 4 (No) 4,000 litre tanks while Figure 2.6.1 states 4 x 1000 litre holding tanks. Please clarify the capacity of the holding tanks and revise Figure 2.6.1 accordingly.
4. Provide a site drawing showing the location of the foul water monitoring sites FW1 and FW2.

## **J7 Noise**

1. Please provide a drawing showing the proposed noise monitoring locations. Section 4.3.5 of the EIS states that proposed noise monitoring locations are outlined in figure 4.3.5.1 however figure 4.3.5.1 has not been provided.

## ARTICLE 13 COMPLIANCE REQUIREMENTS

1. Provide a description detailing the inter-relationship between human beings, flora, fauna, soil, water, air, climate, landscape, material assets, in relation to data required to identify and assess the main effects, which the proposed development is likely to have on the environment
2. Under Section 4.13 of the EIS, reference is made to Table 4.13.1, however this table is not produced. Provide table 4.13.1 highlighting impacts and effects on interactions between environmental media and identifying the sections of the EIS where the interactions are addressed.
3. Provide details on the estimated type and quantity of expected residues and emissions resulting from operation of proposed development affecting vibration.
4. Section 2.1.1 of the EIS states *'The annual average rainfall data for the Rosslare station is presented in Table 2.1.1.'* Table 2.1.1 provides details of wind direction at Rosslare as opposed to average rainfall data. Provide Table 2.1.1 containing data for annual rainfall at Rosslare station.
5. Section 2.2.4 of the EIS states *'The odours emitted from non-hazardous solid waste are considered a nuisance to the public rather than an environmental hazard and controls of this potential nuisance are presented in Section 3.4.6.'* Section 3.4.6 deals with *'Ferrous and non-ferrous metals'* Provide details of the controls that will be put in place to keep odours from putrescible waste to a minimum.
6. Reproduce Figure No 1.1.1. *'Site Location Map'* showing the location of Coolnaveagh Bridge in relation to the location of the Waste Transfer Station.
7. Provide an updated EIS non-technical summary of all information supplied, including that supplied in response to this notice. Furthermore the following information was omitted from the summary:
  - A description of the land use requirements during the operation phase
  - A description of the aspects of the environment likely to be significantly affected by the proposed development.

Your reply to this notice should include a revised non-technical summary (Application Form and EIS), which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

The requested information should be submitted to the Agency within one month of the date of this notice, in order to allow the Agency to process and determine your application.

Please supply Article 12 information in the form of an original and five copies and Article 13 information in the form of an original and fifteen copies.

Please note that the application's register number is **202-1**. Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

Bernie Murray  
Ms Bernadette Murray  
Inspector  
Office of Licensing & Guidance