

**INSPECTORS REPORT**  
**WASTE LICENCE REGISTER NUMBER 44-1**

**(1) Summary:**

<b>Name of Applicant</b>	Padraig Thornton Waste Disposal Ltd.
<b>Facility Name (s)</b>	Thornton's Recycling Centre
<b>Facility Address</b>	Killeen Road, Dublin 10
<b>Description of Principal Activity</b>	transfer Station
<b>Quantity of waste (tpa)</b>	150,000
<b>Environmental Impact Statement Required</b>	Yes
<b>Number of Submissions Received</b>	5
<b>INSPECTOR'S RECOMMENDATION</b>	That the proposed decision, as submitted to the Board, be approved.

Notices	Issue Date(s)	Reminder(s)	Response Date(s)
<b>Article 14 (2) (b) (i)</b>	Not Applicable		
<b>Article 14 (2) (b) (ii)</b>	4/6/98, 13/7/98	5/8/98	10/7/98, 15/7/98, 31/7/98, 8/9/98, 14/9/98
<b>Article 14 (2) (a)</b>	17/9/98		
<b>Article 16</b>	18/9/98, 24/5/99	12/2/99	23/11/98, 7/12/98, 14/12/98, 22/12/98, 2/3/99, 11/5/99, 16/6/99, 17/6/98

<b>Applicant Address</b>	Thornton's Recycling Centre, Killeen Road, Dublin 10.
<b>Planning Permission status and date granted (if appropriate)</b>	1) Original planning permission; decision order P591; 15/3/94 2) Extension planning permission; decision order P1168; 9/4/97 3) Bord Pleanala ; ref. 29S.102398; 30/4/98 4) Waste Permit (European Communities(Waste) Regulations, 1979); Permit No. CL 794/6
<b>Planning Authority</b>	Dublin Corporation
<b>Date Application received:</b>	30 <sup>th</sup> April 1998
<b>Confidential Information Submitted</b>	No
<b>Location of Planning Documents in Application</b>	1) and 2) Attachment B.4 of the application 3) Additional information submitted 5/5/98
<b>Location of EIS in Application</b>	Stand alone EIS in one volume.

#### **FACILITY VISITS:**

<b>DATE</b>	<b>PURPOSE</b>	<b>PERSONNEL</b>	<b>OBSERVATIONS</b>
25/5/98	Site Notice check and site visit.	E. Merriman	Site Notice compliant with Regulations. Active transfer station.
26/4/99	Site visit.	E. Merriman	Visit site and surrounds. Active transfer station.

**(2) Class/Classes of Activity**

**The classes of activities for which the applicant has applied are marked below. The principal activity is indicated by (P), other activities by (X).**

<b>Waste Management Act, 1996</b>			
<b>THIRD SCHEDULE Waste Disposal Activities</b>		<b>FOURTH SCHEDULE Waste Recovery Activities</b>	
1. Deposit on, in or under land (including landfill).		1. Solvent reclamation or regeneration.	
2. Land treatment, including biodegradation of liquid or sludge discards in soils.		2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).	X
3. Deep injection of the soil, including injection of pumpable discards into wells, salt domes or naturally occurring repositories.		3. Recycling or reclamation of metals and metal compounds.	X
4. Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.		4. Recycling or reclamation of other inorganic materials.	X
5. Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.		5. Regeneration of acids or bases.	
6. Biological treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		6. Recovery of components used for pollution abatement.	
7. Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		7. Recovery of components from catalysts.	
8. Incineration on land or at sea.		8. Oil re-refining or other re-uses of oil.	
9. Permanent storage, including emplacement of containers in a mine.		9. Use of any waste principally as a fuel or other means to generate energy.	
10. Release of waste into a water body (including a seabed insertion).		10. The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system,	
11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.	P	11. Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.	
12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.		12. Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.	
13. Storage prior to submission to any activity referred to in this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.	X	13. Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.	X

**Class description:**

### **Third Schedule**

Class 11 : This is the principal activity. Non-hazardous, non-liquid commercial, industrial and domestic waste is deposited in Building Number 1 prior to reloading using a mobile grab into large articulated trailers for dispatch to landfill. Some of this waste may be subjected to a pick-off line in the future. Additionally, approximately 5,000 tonnes per annum of road cleansing waste, following initial processing in a designated area on site, is dispatched for disposal.

Class 13 : This refers to the temporary storage of waste from Class 11 above and residues from the Fourth Schedule recovery activities prior to dispatch to landfill.

### **Fourth Schedule**

Class 2 : Waste wood is shredded on site and stockpiled. It is then collected by Finsa Forest Products who transport it to Scarriff, Co. Clare where it is used to make chipboard. Paper may be recovered in the future.

Class 3 : Steel and other metals are separated from C&D waste by hand for off-site recycling by third parties.

Class 4 : Stones, bricks and fines are currently recovered from C&D waste for reuse. The applicant may begin recovery of glass and plastics in the future.

Class 13 : This refers to the temporary storage of recovered materials prior to dispatch for recycling or reuse.

### **Activities recommended for licensing:**

It is recommended that all the above activities, for which the applicant has applied for a waste licence, be licensed subject to the conditions contained in the Proposed Decision.

## **(3) Facility Location**

**Appendix 1 contains a location drawing and a layout drawing showing the significant features of the facility.**

The transfer station is located on the Killeen Road, Dublin 10 within an industrial estate. All the immediate neighbours are industrial or commercial premises. The nearest residential properties are located 175 metres to the north of the site in Ballyfermot. There is good access to main roads such as the M50 and N7.

## **(4) Waste Types and Quantities**

The total quantities and types of wastes accepted by the facility are shown below.

YEAR	NON-HAZARDOUS WASTE (tpa)	HAZARDOUS WASTE (tpa)	TOTAL QUANTITY OF WASTE (tpa)
1997	108,175		
1998	120,000		
1999	120,000	0	
2000	150,000 (Note 1)	0	

Note 1: The applicant originally applied for 120,000 tonnes per annum. However, after the application was certified as being valid, the applicant sought to increase this amount to 200,000 tpa. However, the maximum increase that could be allowed without the submission of a new EIS is 30,000 tpa. Therefore, Condition 5.15 stipulates that the waste intake shall not exceed 150,000 tpa. The applicant has demonstrated that the facility has the capacity for this quantity.

The nature of waste processing, and the associated infrastructure and plant, at this facility has also been altered several times throughout the application process. As a result a new waste handling building, known as Building Number 3, requires the submission of a proposal as to its intended use (Condition 5.8).

#### (5) Activity Summary

This facility is a privately owned transfer station which incorporates recovery of certain materials. Industrial and commercial waste of a similar nature to municipal waste, construction and demolition waste, road cleansing waste and domestic waste is delivered to the facility (Condition 5.2). No hazardous or liquid waste are acceptable (Condition 5.1). Approximately 10% of waste accepted at the facility is recovered at present, though the applicant hopes to increase this amount following recent infrastructure development.

Waste for disposal, the principal activity, is transferred to bulk containers inside Building Number 1 for delivery to landfill. There is also a confidential paper shredding service located in a separate room in Building Number 1.

The newly erected Building Number 2 allows the wood and C&D waste processing to be completed indoors, thus allowing for control of nuisance.

Another new building, Number 3, has recently been erected at the facility, but no active proposal for its use was submitted with this application. Condition 5.8 requires the licensee to submit proposals on any new waste processing procedure for this building.

There is a special area outside Building No. 2 for the acceptance of road cleansing wastes for eventual disposal to landfill.

There is also a garage/office complex on the facility. The garage maintains vehicles and skips belonging to the licensee.

## **(6) Facility Operation/Management**

- **Waste Acceptance Procedures**

Only non-hazardous, solid wastes can be accepted (Condition 5.1), and Condition 5.5 seeks a procedure for the management of unacceptable waste received at the facility. However, as there is no waste quarantine area, Condition 4.5.5 provides for a quarantine area/waste inspection area (currently waste is inspected either at the weighbridge or tipping floor). Condition 5.6 prohibits casual public access and requires initial characterisation of the waste of prospective clients prior to its being accepted at the facility. Condition 5.4 requires the submission of waste acceptance procedures. Condition 5.3 requires the classification of all industrial waste received at the facility according to the EWC code. Road cleansing waste, which is subjected to a special handling process, is defined in the Interpretation. However, Condition 5.14 conditions acceptance of road cleansing waste to clients agreed with the Agency so as to control the source of the cleansing wastes. These conditions should ensure that this facility only handles the waste types specified for acceptance in this licence (Condition 5.2).

- **Waste Handling**

Condition 5.9 seeks a proposal for the recovery of appropriate components of the waste accepted at this facility.

There are currently five waste streams at this facility.

1. Confidential paper shredding in Building Number 1. The plant for this operation consists of a 15 kilowatt and a 45 kilowatt shredder, both of Ulster Engineering manufacture, and two associated conveyor belts. This process is located in a first-floor, dedicated room of Building No. 1 (Condition 5.13).
2. Domestic and commercial waste bulking for dispatch to landfill. The waste for this operation is tipped into a pit on the ground-floor of Building No. 1 (Condition 5.10). Large, open-topped articulated trailers are backed down a ramp adjacent to the deposited waste, and a mobile grab transfers and compacts the waste into these trailers. The trailers are then covered prior to dispatch to landfill. None of this waste stream is currently recovered. However, the applicant has acquired a materials pick-off conveyor system and proposes recovery of materials from this waste stream though no details have been provided.
3. Construction and Demolition waste recovery. C&D waste is tipped into pits in the floor of Building No. 2 (Condition 5.12). From there it is transferred by mobile plant to a shredder/trommel/hand-pick-off line. Recovered metal is dispatched for recycling to Cummins Metals. Recovered wood is chipped (see item 4 below) prior to dispatch for recycling. Recovered fines are used for landfill cover material. Stones and brick are also recovered for reuse.
4. Wood recovery. In addition to wood removed from the C&D waste stream, some waste wood is delivered to the facility as a separated material.

Recovered wood is loaded by a mobile Fuchs MHL 340 grab loader into a mobile Doppstadt AK-420 wood-chipper. The latter stockpiles the chipped wood using an integral conveyor belt. Currently this chipped wood is dispatched to Finsa in Co. Clare for recycling into chipboard. Currently this operation takes place outdoors adjacent to the western boundary of the facility. However, Condition 5.11 stipulates that this process is transferred inside Building Number 2 in order to aid the control of noise and dust nuisances.

5. Road cleansing wastes. Approximately eight road sweepers, each of which contain approximately two tonnes of waste, visit the facility daily. Thus this waste stream will generate up to 5,000 tonnes per annum. A dedicated area for the tipping of road sweeping waste has been installed west of Building No. 2 (Condition 4.18.1: as this is a novel design, this condition will allow for agreed modification in the light of operating experience). Road sweeping vehicles deposit their contents on to a concreted area. Liquid then drains from the deposited waste through a sediment trap and oil separator prior to discharging to foul sewer (Condition 4.18.2 provides for an adequate standard of such treatment). The remaining solid waste is then mixed with other waste destined for landfill disposal.

- **Nuisance Control**

Due to the fast turnaround of any waste with the potential to attract vermin or create odours (Condition 6.1) and the requirement that such waste must be cleaned from the floor of Building Number 1 at the end of the working day (Condition 5.22); the situation where all waste processing, other than road cleansing waste, occurs indoors; the fact that Condition 5.20 prohibits the burning of waste; the fact that Conditions 6.5 to 6.7 are designed to protect the environment at or in the vicinity of this facility from litter, odours and spillages; the fact that Condition 4.4.3 requires the installation of a wheelwash facility; the fact that Condition 6.9 stipulates that there shall be no significant impairment beyond the facility boundary due to odours; then neither vermin, odour or litter problems are anticipated at this facility under normal circumstances.

However, Condition 6.8 seeks a vermin control procedure so that agreed action can be implemented immediately in the event of a vermin problem developing.

Conditions 6.2, 6.3 and 6.4 should quickly control any litter or odour problems that may occur.

Thus the conditions of this licence should form the basis of adequate nuisance control at this facility.

- **Dust Emissions**

Currently wood chipping and associated storage occurs outdoors, but in future it will have to be carried on indoors (Condition 5.11) in order to control inherent dust and noise nuisances. C&D waste processing has also been limited to Building Number 2 for similar reasons (Condition 5.12). Condition 6.6 requires the open yard to be maintained in a mud-free manner so as to alleviate fugitive dust emissions. Condition 4.22 requires the installation of an agreed dust control system

inside Buildings Number 1 and 2. Condition 7.5 requires a dust control procedure which will tie together all the various control avenues. Thus the sources of dust emissions will be controlled by this licence.

Standard dust deposition limits have been set for the boundaries of the facility (Condition 7.1), and Condition 7.3 stipulates no significant impairment of the environment beyond the facility boundary as a result of emissions. Condition 9.1 stipulates a dust deposition monitoring regime. Condition 9.5.2 also requires the evaluation of PM<sub>10</sub> emissions (the processing of C&D and wood waste may be significant sources) once the above controls have been put in place. Condition 9.5.1 seeks a proposal for the location of dust deposition monitoring points (the location of current monitoring points require review in the light of recent infrastructure development at the facility). Thus the dust control procedure and abatement equipment installed under this licence can be continually assessed against the set dust deposition limit.

- **Hours for Waste Acceptance**

Monday to Saturday, 8am to 7pm. (Condition 5.16).

<b>(7) Facility Design</b>
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- **Infrastructure;**

There are five waste handling areas on site:

- a) Building Number 1 (waste transfer area),
- b) Building Number 1 (confidential paper shredding line: Condition 5.13),
- c) Building Number 2 (waste recovery),
- d) Building Number 3 (Condition 5.8 seeks a proposal for its use), and
- e) a dedicated outdoor area to the west of Building No. 3 for road-sweeping waste (Condition 5.14).

There is one other significant building on-site, namely the office/garage building. The garage, comprising three bays, is used for vehicle and skip maintenance.

Other infrastructure includes a vehicle washing bay and steam cleaner shed (Condition 4.7), a borehole and associated above-ground reservoir tank (Condition 4.11 requires adequate protection), bunded fuel tanks (Condition 4.8), a weighbridge of 60 tonnes and a weighbridge office (Condition 4.6 ; this also allows for the installation of a second weighbridge which the applicant proposes), toilet/shower and canteen portacabins (Condition 4.5.1), two stacked portacabins for skip administration (Condition 4.5.1), and staff/visitor car parking area (Condition 4.5.1).

Condition 4.21 requires a fire detection system for all waste handling buildings. Condition 4.3.1 requires a proposal for the facility security to be submitted to the Agency, while Condition 4.3.2 requires facility boundary fencing to be installed to the satisfaction of the Agency. Condition 4.4.2 requires a traffic management plan.



## **(8) Restoration and Aftercare**

No specific Restoration and Aftercare plan was submitted with the application and Condition 8.1 requires the submission of such a plan. Condition 11.2 seeks a financial provision which will also cover restoration costs. However, as this is a non-hazardous transfer station, no special problems are envisaged in the event of site closure other than a site clean-up (primarily waste and fuel removal). No aftercare requirement is envisaged.

## **(9) Hydrogeology**

The facility is located over the moderately productive, locally important Calp limestone aquifer. However, due to the impermeable nature of floors and yards at the facility (Condition 4.4.1), all surface water run-off will be directed either to local authority foul sewer (Condition 7.8) or to the River Liffey system via storm water drains (Condition 7.7), thus precluding the risk of contamination to groundwater other than through a well which is used to obtain a water supply. Condition 4.11 requires the necessary arrangements to prevent any materials entering groundwater through this well should be put in place as appropriate. Condition 4.17 also requires maintenance of underground pipes and tanks, thus protecting against leaks from these sources. Condition 7.6 prohibits both direct and indirect discharges to groundwater. Therefore the risk of groundwater contamination by activities at this facility is extremely low.

In addition to a mains water supply to this facility, the applicant has installed the aforementioned well along with an aboveground storage tank. The yield of this well is estimated at 100 m<sup>3</sup>/day. Currently in Ireland there are no regulations governing abstraction rates from groundwater. However, in view of the relatively low abstraction rate at this facility from a locally important aquifer, it is unlikely to have any significant effect on other groundwater abstractors in the vicinity. However, in order to measure the trade discharge to foul sewer, as required by Condition 9.3, the rate of abstraction from this borehole will be recorded.

## **(10) Emissions to Air**

There are no emissions to air other than dust and odours, both of which are discussed elsewhere in this report.

## **(11) Noise Emissions**

This facility is located within an industrial estate. Noise levels are generally high due to traffic in the vicinity. The nearest sensitive receptors, a housing estate, are located approximately 175 metres north of the facility. Two noise surveys have indicated a slight impact on this housing estate, particularly when the wood chipper, the shredder and the trommel were operating. However, the newly constructed Building Number 3,

which should provide additional noise attenuation to the east and north east of the site, and the relocation of the fixed noisy plant indoors (Condition 5.11 and 5.12.) will reduce this impact significantly. Also, Condition 7.4.2 requires a report on further noise attenuation measures that might be taken at the facility.

Condition 7.1 sets boundary day and night noise emission limits, while Condition 7.4.1 states that there shall be no tonal or impulsive component at the boundary. The control measures above, and new any new measures implemented through Condition 7.4.2, should ensure compliance with the noise emission limits. Condition 9.6 requires the submission of an annual noise survey at four facility boundaries and the nearby residential area as well as two further off-site locations which will aid interpretation of results. However, in light of developments at the facility during the application process, the location of existing noise monitoring points require revision and the submission of new boundary monitoring points if appropriate.

#### **(12) Emissions to Sewer**

The foul sewer drainage is as detailed in Drawing 500-100 (rev. B). Discharges to foul sewer from Buildings Number 2 and 3 will pass through sediment traps and an oil separator. Condition 4.15.2 requires the maintenance of these sediment traps. Discharges to foul sewer will only occur at two locations F.1 and F.2 (Condition 7.8.1). In addition to domestic type effluent, there will be trade effluent comprising of wash bay effluent, roadsweeper waste area effluent, possibly wheel wash effluent, surface water run-off adjacent to fuel bunds, and any liquids emanating from the three waste handling buildings (Numbers 1 to 3). Dublin Corporation, the relevant sanitary authority, submitted conditions in response to a section 52 notice, and these were incorporated into the licence. Monitoring of the two emissions is stipulated by Condition 9.1, while emission limits are set by Condition 7.1.

Additionally there is a risk of spillages reaching the foul sewerage network. Condition 4.20, in addition to requiring adequate sampling points, stipulates cut-off valves for these two discharges, while Condition 4.14 specifies in situ labelling of these valves. In conjunction with Conditions 7.8.3 and 10.1 to 10.3, the foul sewerage system should have adequate protection against spillages. Condition 3.8 requires notification of the Sanitary Authority in the event of any incident which relates to foul sewer discharges.

#### **(13) Emissions to Surface Water**

Surface water discharges from this facility are directed to storm drains, thence to the Cammock River before finally discharging to the River Liffey just upstream of Heuston railway station. The quality of surface water discharges has been poor, with high suspended solids and oil content in particular. Thus a sediment trap cum oil separator is required (Condition 4.19.1).

The surface water drainage is as detailed in Drawing 500-100 (rev. B). These drainage arrangements (Condition 4.9) and Condition 4.10, which stipulates that dirty surface

water run-off from waste processing areas is directed to foul sewer, should ensure that only relatively clean run-off discharges to storm drain.

There are two discharges to storm drain from this facility (Condition 7.7.1). SW.1 is the primary discharge and Condition 9.1 requires its monitoring. SW.2 is for the discharge of clean water run-off from the roofs of two buildings only (Condition 7.7.2), and therefore monitoring of this discharge not required. Condition 7.7.3 stipulates that there shall be no visible oil in either of these discharges, while Condition 7.3 requires that no emissions have a significant impact on the receiving environment..

Once all waste processing is relocated according to the conditions of this licence, the main risks to surface waters arising from activities at the facility will be poor yard maintenance, accidental spillages and improper maintenance of both the surface water and foul sewer drainage networks. The headings below detail measures to guard against these risks, as well as ensuring adequate emergency control/mitigation procedures and monitoring of surface water discharges to gauge the effectiveness of these controls.

#### Yard Maintenance

1. Condition 6.6 requires the yard area to be kept in a tidy and mud-free state.

#### Protection Against Accidental Spillages

1. Condition 4.8 stipulates bunded storage for all fuel storage tanks/drums, including cleaning materials for the Wash Bay, waste oil and diesel (the existing diesel bund is not satisfactorily designed).

#### Drainage Network Maintenance

1. Condition 4.16 requires routine maintenance of the drainage network. This will optimise the capacity and efficiency of sediment traps and oil separators, thus allowing for maximised mitigation in the event of a spill. It will also protect against cross-over between the foul sewer and storm water discharge networks due to blockages.
2. Condition 4.15.2 requires a procedure for the maintenance of sediment traps.

#### Emergency Situations

1. Condition 10.1 requires the submission of an emergency response procedure.
2. Condition 4.19.3 stipulates a cut-off valve at the primary surface water discharge point, SW.1. Thus, if a spill occurs, it can be easily contained pending remedial action. No cut-off valve is required for the second discharge point as it should only discharge clean roof run-off water (Condition 7.7.2).
3. Condition 10.2 requires a stockpile of absorbent materials which can be used to clean up any spills.
4. Condition 10.3 requires immediate remedial action in the event of a spill.
5. A sediment trap and a full retention Class 1 separator shall be located immediately upstream of the discharge at SW.1 (Condition 4.19.1). As well as routine control of surface water discharges, this installation, will protect against spills in all weather conditions.

#### Monitoring

1. Condition 4.19.2 requires the installation of an agreed monitoring station for SW.1.
2. Condition 9.1 requires monthly monitoring of key parameters which will highlight any problems with the discharge.

#### **(14) Waste Management, Air Quality and Water Quality Plans**

1. The Water Quality Management Plan for the Liffey Catchment only relates to the Liffey catchment upstream of Islandbridge. The relevant plan is the Dublin Bay Water Quality Management Plan. Other than noting that the Cammock river is supportive of fish life whilst being eutrophic, no water quality objectives are set for it. Condition 7.3 states that there shall be no impairment to the environment beyond the facility boundary.
2. There is a draft Air Quality Management Plan for Dublin. The only target of relevance to this application is that for PM10's. As therecovery of C&D waste may potentially lead to emissions of PM10's, Condition 9.5.2 requires a report on PM10 emissions within twelve months of the grant of this licence. Measures to reduce dust emissions from this facility, as previously discussed, should also reduce any PM10 emissions.

#### **(15) Submissions/Complaints**

Five submissions have been received in connection with this application. They are summarised below:

1. Mr. Jack Cahill, a consultant for C&C (Ireland) Ltd. Mr. Cahill raised concerns about the impact of dust emissions from Thornton's recycling Centre on his client, C&C (Ireland) Ltd, a soft drinks manufacturers located east, and therefore generally downwind, of the applicant.

*A report was sought from Dublin Corporation. The Corporation replied that they had carried out several inspections of the facility, and that their requests were complied with. They believed the applicant was employing the Best Practical Means under the Air Pollution Act, 1987. Additionally, the measures discussed in Dust Emissions of this report should see a large reduction in dust emissions from this facility. The dust deposition limit, Condition 7.1, which applies to the facility boundary, should ensure that dust emissions from Thorntons do not cause a nuisance to C&C (Ireland) Ltd.*

2. The Heritage Service, Duchas. No archaeological objections to the granting of this licence.

*No response required.*

3. Mr. Jack Cahill on behalf of C&C (Ireland) Ltd. Three concerns were raised;
  - a) Dust Monitoring Frequency. *Condition 9.1 sets the monitoring frequency for dust deposition monitoring to monthly. This will allow assessment of the dust control measures instigated by this licence. Eleven sets of dust monitoring results have been submitted with this application. These results show that the facility may on occasion be generating nuisance to the surrounding environment. However, the activities which give rise to dust emissions are being controlled through conditions of this licence. Additionally, the facility is located within an industrial estate and other sites may be contributing to dust deposition in the vicinity.*

- b) Dust Suppression. The submitter requests that the dust control system proposed for Buildings Number 1 and 2 in the EIS be monitored and recorded. *The applicant now proposes a third waste handling building (Number 3). Therefore a revised dust control procedure must be installed and maintained by the applicant for all three waste handling buildings within six months of the grant of this licence subject to the agreement of the Agency(Condition 4.22). Also a procedure on dust control must be submitted within three months of the grant of this licence for the agreement of the Agency (Condition 7.5). It is envisaged that this procedure will address this particular concern of the submitter. Condition 1.5 will also allow the Agency to require further dust control measures in the event of non-compliance with any of the conditions of this licence.*
- c) Proposed Well. The submitter was concerned that water abstraction from a borehole at the facility was a needless waste of a groundwater used by C&C (Ireland) Ltd. *There are no regulations governing groundwater abstraction which apply to this borehole. It can be said, however, that the activities at this facility should not cause any contamination of groundwater, and therefore pose a risk to the supply of C&C (Ireland) Ltd.*
5. Ken Spratt, Department of the Environment and Local Government. Passed on a complaint received by his Department from C&C (Ireland) Ltd. concerning dust emissions from Thornton's Recycling Centre. This complaint again referred to dust emissions from the facility causing C&C (Ireland) Ltd. concern. *A second report was sought from Dublin Corporation on the matter complained of. Again, Dublin Corporation said that the facility owner had cooperated with their requests to prevent/limit the continuance of an air pollution nuisance. However, it was acknowledged that dust and odours have on occasion been a problem. The measures discussed in Dust Emissions of this report should see a large reduction in dust emissions from this facility. The dust deposition limit, Condition 7.1, which applies to the facility boundary, should ensure that dust emissions from Thorntons do not cause a nuisance to C&C (Ireland) Ltd.*
6. National parks and Wildlife Service, Duchas ; no objections to the granting of this licence. *No response required.*

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_

Eamonn Merriman,  
Inspector,  
Environmental Management and Planning.

**APPENDIX 1**  
**LOCATION PLANS**

## **APPENDIX 2**

### **SUBMISSIONS**

1. Jack Cahill on behalf of C&C (Ireland) Ltd.,
2. The Heritage Service, Duchas. No archaeological objections to the granting of this licence,
3. Jack Cahill on behalf of C&C (Ireland) Ltd.,
4. Ken Spratt, Department of the Environment and Local Government. Passed on a complaint received by his Department concerning dust emissions received from C&C (Ireland) Ltd., and
5. National Parks and Wildlife Service, Duchas ; no objections to the granting of this licence