



**OFFICE OF  
LICENSING &  
GUIDANCE**

**INSPECTORS REPORT ON A LICENCE APPLICATION**

<b>To:</b>	DIRECTORS	
<b>From:</b>	ANN MARIE DONLON	- LICENSING UNIT
<b>Date:</b>	04/02/05	
<b>RE:</b>	APPLICATION FOR AN WASTE LICENCE FROM PARDRAIG THORNTON WASTE DISPOSAL LIMITED, LICENCE REGISTER 206-1	

**Application Details**

Type of facility:	Non-Hazardous Materials Recovery Facility and a Civic Amenity Facility
Class(es) of Activity ( <b>P</b> = principal activity):	3 <sup>rd</sup> Schedule: 11, 12, 13 4 <sup>th</sup> Schedule: 2, 3, 4, 12, 13 ( <b>P</b> )
Quantity of waste to be managed per annum:	50,000 t
Classes of Waste:	CA: Dry, recyclable, non-hazardous and hazardous household waste. MRF: Dry, recyclable household waste, dry, non-hazardous skip waste (household, commercial, industrial and construction and demolition projects).
Location of facility:	Dunboyne Industrial Estate, Dunboyne, Co. Meath.
Licence application received:	15/04/04
Third Party submissions:	279
EIS Required:	Yes
Article 14 Notices sent:	26/05/04, 27/07/04
Article 14 compliance date:	23/12/04
Site Inspection:	10/05/04, 11/05/04, 29/11/04

## 1. Facility

Padraig Thornton Waste Disposal Limited (PTWDL) was granted a waste permit by Meath County Council to operate a Civic Amenity and Materials Recovery Facility at this location (WMP 2002/33). The facility is currently permitted to handle 5,000 tonnes of non-hazardous waste. The facility commenced operations under the permit on the 1/11/04. PTWDL propose to intensify the waste acceptance activities to 50,000 per annum. This intensification will broaden the waste types to be accepted at the facility. The applicant proposes to accept hazardous recyclable material at the civic amenity facility. The bulk of the waste will be construction and demolition waste (28,020 tonnes).

The principle activity is Class 13 of the Fourth Schedule Waste Recovery Activities : 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.

Other activities:

Fourth Schedule; waste recovery activities: Class 2 (recycling & reclamation of organics), Class 3 (recycling & reclamation of metals), Class 4 (recycling & reclamation of inorganics), Class 12 (exchange of waste).

Third Schedule; waste disposal activities: Class 11 (blending), Class 12 (repackaging), Class 13 (storage).

The facility will employ approximately 15 full time staff. Staff number includes eight site operatives. Waste acceptance hours are from 0800 to 1900 Monday to Saturday. The site will be operational for an additional one hour after closing.

The facility is located approximately 600m north of Dunboyne village centre and 180m north of the industrial estate. Its immediate surroundings are cultivated and undeveloped land. Within 200m of the facility is a mixture of industrial/commercial developments, agriculture and residential developments.

### Infrastructure

The facility consists of a material recovery building where bulking, mechanical segregation of waste types and storage of waste occurs. The building also includes a maintenance shop and a waste quarantine area. The plant equipment includes a grab, trommel, compactors, overband magnet, windshifter and shredder.

It is proposed that the civic amenity area will have 35 receptacles servicing 18 different classes of materials (1500 tonnes non-hazardous, 480 tonnes hazardous). There are three bays in the main process yard for the bulking of CA recyclables and subsequent storage.

Other ancillary infrastructure includes an administration building, weighbridge and office, wheel wash and truck wash, storm water drainage system and sanitary and trade effluent drainage system and car parking.

Padraig Thornton Waste Disposal Limited operates a waste licensed facility at Kileen Road, Dublin (Reg No. 44-2) and is in the process of applying for another waste licence (Reg. No. 179-1).

PTWDL was refused planning permission by Meath County Council for the intensification of activities on this site. The reasons for refusal relate to traffic congestion, traffic hazards and increased levels of noise and disturbance generated by traffic and therefore are contrary to proper planning and sustainable development of the area. The decision is currently being appealed to An Bord Pleanala.

## 2. Operational Description

### Civic Amenity Facility:

The civic amenity facility is located in the south west corner of the site and is separated from the materials recovery facility by walls and gates. Household recyclables will be deposited into approximately 35 containers. The facility will be supervised. Types of waste collected are as follows:

*Hazardous waste:* waste oil, oil filters, batteries and accumulators, fluorescent tubes and other mercury containing waste, fridges and WEEE,

*NonHazardous waste:* glass, aluminium cans, steel, steel cans, cardboard, newspaper & magazines, timber & wood, green waste, textiles, plastic film, plastic bottles and tetra pak.

Some containers in the CA will be suitable for bulk haulage whereas others will be emptied into larger containers in three storage bays. These bays may also have a hopper and compactor for bulking certain recyclables e.g. green waste.

#### Materials Recovery Facility (MRF):

Dry, non-hazardous waste will be segregated and stored in the MRF building. Waste loads will be inspected at the weighbridge and again on the floor of the MRF building. Any unacceptable waste will be identified, segregated and stored temporarily in the waste quarantine area prior to transfer to an appropriate facility.

Occasionally bags of domestic waste will be found and placed in a hopper, which feeds a compactor located outside the MRF building. Domestic waste will be disposed off-site.

C&D waste (28,020 tonnes/annum) and commercial waste skips, industrial waste skips and household waste skips originating from C&D projects will undergo segregation and temporary storage in this building prior to transfer to other facilities. Household, commercial and industrial skips not originating from C&D projects will be tipped on the floor of the MRF building where the recyclable fraction will be separated out using the grab and the remainder will be temporarily stored and then loaded into a bulk haulage container. Green bin recyclables will be tipped on the floor of the MRF for bulking into larger containers.

Segregation of C&D waste will be by mechanical means. Waste will initially be shredded. An overband magnet will separate ferrous metals, which will be delivered to a storage skip outside the MRF building. The residual waste will be feed to a trommel, which separates the fines fraction. The larger fraction is conveyed to the windshifter that segregates the remaining waste into hardcore, timber and paper/plastic/cardboard. The fines, hardcore and timber will be stored in individual bays within the MRF building. The paper/cardboard/plastic will be conveyed to a compactor in the maintenance building.

Run-off from the waste will be directed to the trade effluent drainage system. The fines storage bay will be sealed by means of a hydraulic door to prevent migration of dust emissions. The trommel and all conveyors will be fitted with dust canopies to reduce dust emissions. The three roller doors will be lined with dust curtains.

The significant noise sources from the MRF will be the trommel, compactor, grab and shedder.

The capacity of the equipment is limited by the windshifter. The windshifter has a 40tonne/hour capacity. Taking into account breakdowns and inconsistent feed, the capacity is estimated at 65,000 tonnes per annum. The storage bays within the MRF consist of three active and three spare bays, each with 100m<sup>3</sup> capacity. The waste reception area on the MRF floor is 300m<sup>3</sup>. There is no separate loading access for the segregated fractions. This will limit the capacity of the MRF as loading and unloading will occur at the same points.

### **3. Use of Resources**

- Fuel: utilised for mobile machinery
- Electricity: utilised for MRF plant equipment.

- Water: used for truck wheel wash.

## **4. Emissions**

### **4.1 Air**

There are no point source emissions to atmosphere from this facility. The main emission to atmosphere from this facility is fugitive dust from the MRF. As detailed above dust curtains, dust canopies and a hydraulic door on the fines bays are proposed to prevent dust emissions from the MRF. A wheel wash is proposed to prevent contaminants from being carried onto the main road. It is also proposed to regularly clean hardstanding areas. As a result no significant impact is predicted. The abatement techniques are considered to represent BAT. The RD requires the provision and maintenance of these dust control facilities.

The RD specifies ambient limit values for dust deposition and fine particulates in line with the BAT Guidance Notes for the Waste Sector: Waste Transfer Activities (Draft April 2003).

Putrescent waste may not be accepted onto the site and therefore odours will not be significant emission. The RD specifies that domestic, putrescent and liquid waste will not be accepted on-site. The RD requires all waste for disposal to be removed from the site within 48 hour or 72 hours in the case of a bank holiday weekend. Further, the RD requires an odour management programme to be established and maintained.

Green waste will be accepted onto the site via the civic amenity and skips. The RD requires green waste to be compacted into an enclosed compactor at the end of each working day.

### **4.2 Emissions to Sewer**

Trade effluent arises from the MRF building, wheel wash and the truck wash facilities (max. 30m<sup>3</sup>/day). It is discharged to sewer via an oil interceptor and silt trap and treated at Navan waste water treatment plant prior to discharge to the River Boyne. Domestic sewage is also directed to the public sewer. The Navan waste water treatment plant consists of secondary treatment only and is sized to serve 25,000 population equivalents.

#### **Section 52 response:**

In their response to a notice under Section 52, Meath County Council specified parameters, limits, frequency of monitoring and conditions to be attached. These requirements were transposed into the RD. A requirement to monitor heavy metals on a bi-annual basis was also included in the RD.

### **4.3 Storm Water Runoff**

Storm water run-off from all concrete areas of the site will be directed to the storm water collection system, through a silt trap and an oil interceptor and discharge to a local stream forming the northern boundary of the site. Discharges shall be via one outfall (S3). The stream is a tributary of the Tolka River. It was observed during a site visit that part of the stream forming the northern boundary was culverted since the initial application. The EIS did not identify the stream as significant in terms of flora and fauna. The culverting of the stream is not advantageous from an ecological point of view. The RD requires that no further culverting of the stream shall occur.

All tanks shall be bunded. The MRF building has been designed for firewater retention with the floor of the MRF constructed 850mm below the surrounding ground level. In the event of a fire the trade effluent and storm water systems may be shut off by a closure device controlled from the site office. The drains in the MRF are normally open.

### **4.4 Emissions to ground/groundwater:**

There are no emissions to ground from this facility. This facility was built on a green field site. Upon cessation of activities the site shall be returned to a satisfactory state i.e. green field state.

#### 4.5 Noise:

The nearest noise sensitive locations are less than 200m from the facility. A high wall (2.4m) separates the site from Lutterall Hall residential area to the south west of the site. A green field separates the site from residences along a minor road to the east of the site.

The background noise levels at noise sensitive locations were measured for both weekday and weekend. The  $L(A)_{90}$  noise level was 45.5dB(A) and 39.9dB(A) at two noise sensitive locations during the weekday. The  $L(A)_{90}$  noise level was 32.2dB(A) and 36.8dB(A) at the two noise sensitive locations during the weekend.

The main noise sources on-site are the trommel, compactor, grab, shredder and teleporter. The predicted maximum noise levels to be experienced at the boundary of the site range from 51dB(A) to 82dB(A). The predicted maximum noise levels to be experienced at noise sensitive locations are 57dB(A) during weekdays and 51dB(A) and 56dB(A) at the weekend. It is proposed that acoustic screens will be used as required. As part of noise mitigating measures detailed in the EIS, the applicant described best work practices in relation to plant operation.

The RD specifies noise limits at noise sensitive locations in line with the BAT Guidance Notes for the Waste Sector: Waste Transfer Activities (Draft April 2003). The background noise levels at noise sensitive locations during the weekend are less than or marginally above  $35dB_{LA90}$ . To mitigate noise impact, a maximum of 10dB more than the measured  $L_{A90}$  background level is applied where the background noise level is less than  $35dB_{LA90}$ . During the weekday the daytime noise limit is  $55dB_{LAeq}$  and during the weekend the daytime noise limit is  $45dB_{LAeq}$  at noise sensitive locations. The RD requires an annual noise survey and the preparation and maintenance of best work practices to control noise emissions. It is considered that activities carried on during the weekend will be limited initially by the proposed noise limit ( $45dB_{LAeq}$ ) until such noise reduction measures deemed necessary are implemented.

#### 4.6 Nuisance:

Litter control measures proposed include: waste loads shall be covered, skip waste shall be handled in the MRF, the light fraction of C&D (paper, pastics) shall be compacted in the maintenance building, waste accepted at the CA shall be stored in specially designed containers, daily litter patrols and yard swept regularly. The RD specifies these measures to be undertaken.

As domestic, putrescent or liquid wastes may not be accepted at the facility, nuisances associated with birds, aerosols, vermin or pests are unlikely to occur. Any domestic waste which may arrive inadvertently within a skip will be segregated and fed to a waste compactor via a hopper and removed from the site. However the RD specifies requirements for a vermin control programme, an odour management programme, nuisance monitoring and a range of dust control measures.

### **5. Visual Impact**

The proposal is for the intensification of the existing Civic Amenity and Materials Recovery Facility. No additional construction is required. However, trees have been planted along the southern and eastern boundaries of the site, which, when mature, will provide screening of facility.

### **6. Cultural Heritage, Habitats & Protected Species**

The site is not located on or near any nature conservation designation. The closest designation is the proposed NHA, the Royal Canal is located approximately 5.5km to the south of the site.

The significant air emissions from the facility are fugitive dusts. Trade effluent is directed to the public sewer. The uncontaminated storm water is discharged to the River Tolka. No

significant nuisances are associated with the activity. The facility will not impact on the designated site.

## **7. Waste Management Policy and Plans**

The Regional Planning Guidelines for the Greater Dublin Area 2004 to 2016 (July 2004) set 12 to 20 year strategic policy that shall be considered by local authorities in their development plans. The guidelines promote a coherent solid waste management strategy for the whole region (includes Meath). The guidelines note that the targets identified in waste management plans will not be achieved within the specified timeframes and there is a serious lack of waste management infrastructure in the Greater Dublin Area (GDA). The guidelines promote that new waste management infrastructure should be considered in the context of the GDA rather than the existing waste management regions. The guidelines also state that revision of Waste Management Plans is a matter of urgency. The proposed facility is in line with these guidelines.

With respect to waste management infrastructure the Waste Management Plan for the North East Region 1999 to 2004 contains the following policies:

- Provision of 10 standalone recycling stations.
- Recycle 43% of household, commercial and industrial waste.
- Each county will have a small facility possibly served by mobile plant recycling stockpiled C&D waste.
- Transfer station to be provided at four sites and maybe constructed at MRF or recycling centres.

The proposed facility is in line with the policies of the plan with respect to the provision of a recycling station (in part) and the recycle target of 43%. The overall objective of the plan is to achieve the aims and targets set out in the government policy statement – Changing Our Ways. Government waste policy is set out in the document ‘changing our ways’. *Changing our ways* set the following ambitious targets for achievement over a fifteen year timescale:

- Recovery of at least 50% of construction and demolition waste within a five year period, with a progressive increase to at least 85% over fifteen years.

The proposed facility is considered to be in line with the objectives of the plan.

## **8. Environmental Impact Statement**

I have assessed the EIS and am satisfied that it complies with the EIA and Licensing Regulations in so far as environmental pollution from the activity is concerned.

## **9. Fit & Proper Person Assessment**

The applicant was convicted of offences under the Waste Management Act, 1996 under Waste Licence Register No. 44-1 (waste facility at Kileen Rd., Dublin) in April 2001. Offences related to failing to restrict waste activities to the area of land permitted by the licence, non-submittal of reports and exceedance of emission limit values to foul sewer. The applicant paid the fine in full.

The applicant has 25 years experience in the waste business and currently handles approximately 300,000 tonnes of waste. The proposed management structure for the facility includes a site manager and an environmental manager. The applicant proposes to forward full details of all site personnel to the EPA when the facility is operational.

The applicant submitted financial statement for the year ended 2001 and 2002. The accounts indicate a profit on ordinary activities after taxation of €1.95 million in 2001 and €4.3 million in 2002. Net assets are growing; €6 million in 2001 and €12 million in 2002. The accounts

indicate that the company is financially capable of meeting the requirements of a waste licence. The applicant has stated upon closure the site will be decommissioned.

The RD requires the site to be decommissioned in a safe manner.

## 12. Recommended Decision

The significant environmental aspects of this proposal are dust and noise emissions. The RD specifies requirements for the prevention of fugitive dust and sets limit values for dust and particulates. The RD specifies ELV's for noise at the nearest noise sensitive location that observe BAT. Although odour is not considered a significant aspect the RD requires an odour management programme, monitoring and the removal of waste for disposal at regular intervals. This inspector is satisfied that the conditions set out in the RD will adequately address all emissions from the facility and will ensure that the carrying on of the activities in accordance with the conditions will not cause environmental pollution.

## 13. Submissions

There were 279 submissions made in relation to this application. A full listing of all persons who made a submission is appended to this report.

Due to the lengthy nature of submissions, in certain instances all or part of the submission have been paraphrased.

The residents of Lutterall Hall, Plunkett Hall, Chestnut Grove, Woodview Heights and Hamilton Hall account for 190 of the submissions. A template letter was used for each submission. In some submissions additional comments were added.

The residents of Millfarm represent 80 of the submissions. Another template letter was used for each submission. Additional comments were made in some submissions.

The submissions are divided into five subgroups and these are considered below.

### 13.1 Submission from Lutterall Hall Plunkett Hall, Chestnut Grove, Woodview Heights and Hamilton Hall Residents, Dunboyne (190)

There are ten points common to all.

(i) *Our Village: Although this facility was originally billed as a civic amenity and public amenity centre, the mix of materials appears to have changed. Of the original tonnage 50% was to be domestic recyclables. Now the prediction is for 80% to be derived from builders skip waste or commercial and only 20% domestic. The proposed tonnage and materials have very little benefit for the people of Dunboyne and a strong adverse effect on neighbouring residents. This must surely conflict with the proximity principle.*

Comment:- The BAT Guidance Notes for the Waste Sector: Waste Transfer Activities (Draft April 2003) gives guidance on selecting a suitable site location for a materials recovery facility. The basic requirement is that the facility will not cause environmental pollution. The activity, if carried out in accordance with the conditions of this licence, will not cause significant environmental pollution.

(ii) *Lack of Fire service: An increase in waste to 50,000 tonnes automatically increase the likelihood of hazardous material on site so volumes of flammable and combustible goods at this site will increase correspondingly. The baling procedure, which deal with cardboard papers and similar dry good are also prone to fire hazards. Dunboyne has no fire service so in the event of a fire or explosion we do not believe that a fast response could be given considering the proximity of nearby houses.*

Comment:- The risk of fire and fire control in the area is a matter for the Local Authority. The licence specifies the types and quantities of waste materials to be accepted at the site, predominantly dry non-hazardous waste. Hazardous materials is limited to 480 tonnes per

annum, all of which will be received and stored in the civic amenity area. Low levels of flammable material will be accepted on-site. This material will be predominantly paper which will be stored in dedicated enclosed containers. Explosive material will not be accepted on-site. The RD also includes conditions regarding Accident Prevention and Emergency response.

*(iii) Children's health: Lutterall hall was built quite recently and there is a high percentage of toddlers and young children some of whom are asthmatic. We believe the maps and photo in the EIS misrepresent our proximity to the waste site and are deeply concerned about living so close to dust and noise pollution, vermin and hazardous waste. We are concerned about the cumulative effects of these over time on our children's health.*

Comment:- The RD sets sound pressure levels for noise sensitive locations to mitigate against significant impact. The RD specifies limits for dust levels and particulate matter on-site. These limit values observe relevant air quality standards and BAT. The RD requires a vermin control programme. Hazardous waste accepted onto the site is limited to hazardous household waste which will be stored in a designated and secure area. Operation of the facility in accordance with the conditions of this waste licence shall not cause significant environmental pollution.

*(iv) Children's play areas: Dunboyne has no public park so any green areas on our estate are important to us. Our largest such green area is situated only 40 metres from the waste facility and separated by a wall from the site access road.*

Comment:- The RD requires the facility to be secure against unauthorised entry. The wall offers noise attenuation. The RD sets emission limit values for dust, particulate matter and noise levels that observe relevant air quality standards and BAT. Operation of the facility in accordance with the waste licence conditions shall not cause significant environmental pollution.

*(v) Noise: although the waste site has not yet officially opened, it is already possible to hear trucks and skips entering and exiting the site from adjacent properties through closed windows, including truck reversal alarms. If increased tonnage is granted this constant noise source will be audible all day.*

Comment:- Noise levels experienced relate to the construction phase as the facility was not operational under the terms of the waste permit at the time of the submissions. The RD sets noise limits and if the facility is operated in accordance with the limits it shall not cause significant impact. Further, the applicant has identified a number of best practice measures to reduce noise emissions including smart alarms.

*(vi) Visibility: Houses in Lutterall hall have complete visibility to trucks and cars entering/exiting the facility and in particular the exposed roller entry doors of the MRF. As these doors are to be left open during business hours 0800 to 1900 six days a week, all truck and skip activities will be visible to adjacent residents.*

Comment:- Landscaping and visual considerations are a matter for the Planning Authority. However, planting along the southern and eastern boundary of the site shall reduce visibility upon maturity.

*(vii) Flooding: waste batteries are included in the original application to be accepted at this waste facility. Due to their heavy metal content they can cause poisoning of groundwater. Given the fact that Dunboyne is one of the most flooded villages in Ireland the location of this facility so close to houses and agricultural land is a risk. The rainfall data contained in the EIS is only given until 1990 and makes no mention of the 1999-2003 annual floods. We accept that the batteries may be temporarily stored in bunded containers. However, no groundwater analysis has been performed for blank comparison at this site.*



Comment:- Baseline data relating to environmental media is only relevant and required where the medium is likely to be affected by the project. There are no significant emissions to groundwater or soils as a result of the operational phase of this project. Hazardous waste materials shall be stored in covered receptacles.

The risk of the site flooding is a matter for the Planning Authority. However additional information relating to the risk of flooding was sought under Article 14 of the Licensing Regulations. In summary the site is designed to cater for flood conditions that may arise from time to time. Initially the flood waters will be stored in the drainage system, MRF yard and MRF building. The Civic Amenity (CA) is at a higher elevation and will be last to flood. The RD requires an emergency response procedure to address flooding. Further, the RD requires the floodwater will not be discharged to sewer without the agreement of the Sanitary Authority. It should be noted that this site did not flood during the severe 2002 flooding event.

*(viii) Electricity Services: A new ESB substation is to be built at the waste facility. Dunboyne has experienced on average one power cut per month since 2003. We are concerned that a power cut or outage will occur at the site as the majority of equipment in the MRF is electronically run. A power cut could also lead to errors in operating the weighbridge manually.*

Comment:- An ESB substation is located on the edge of the site. This substation will ensure a consistent power supply.

*(ix) Builders skip wastes: the most potentially hazardous type waste accepted at the plant will be builders skip waste which will come from a variety of building sites both new and old. If the waste originates from an older development it may contain asbestos.*

Comment:- Asbestos materials are hazardous waste and the RD does not permit it to be accepted on-site. The RD sets out requirements in relation to waste handling and acceptance procedures. Waste not of the class specified in the RD shall not be accepted. If a waste load is found to be unacceptable it shall be immediately removed to the waste quarantine area within the materials recovery building and transferred to an appropriate facility as soon as possible thereafter. It is not in the interest of the operator to accept waste that cannot be processed on-site.

*(x) Content of wastes: PTWDL has documented no Standard Operating Procedures for dealing with or storing unsuitable material at the site. The application does not in any way outline how possible food waste or contaminated receptacles will be dealt with at the facility. For example, it is naïve to assume that all people will be diligent in their cleaning cans, bottles and containers, prior to submitting them for recycling. As this facility is right beside our housing estate, its location because of this potential health hazard is a huge concern, as this type of material should only be received at refuse dump locations.*

Comment:- The application set out waste handling and acceptance procedures. Section 3.2.2.2 of the EIS describes how the occasional domestic refuse bag shall be removed from waste, placed in a hopper and feed to a compactor. Domestic waste shall be disposed off-site. The RD does not allow for the acceptance of food waste. Recyclables collected in the civic amenity facility shall be stored in appropriate receptacles to prevent leachate run-off or causing environmental nuisances.

### 13.2 Submission from Millfarm Residents, Dunboyne (80)

There are six standard points common to all. Three additional comments made by individuals. Some comments are matters for the Local Authority.

*(i) Traffic congestion: The village cannot at present cope with current congestion. To exacerbate the situation by daily adding up to 100 waste disposal trucks to the chaos is indefensible. These truck drivers will, without doubt, use the Millfarm estate as a short cut to the facility, putting our children at risk.*

Comment:- Traffic is the remit of the Planning Authority.

(ii) *The odours, possibly noxious, certainly disagreeable, which will inevitably emanate from the facility, will be carried directly across residential estates. If this project is given the green light, we will only discover the health implications when it is too late.*

Comment:- Odour is not considered to be a significant aspect of emissions. The facility will not be handling putrescent waste. However, if domestic rubbish arrives inadvertently on-site in skip waste, it shall be removed and placed into an enclosed compactor.

(iii) *Vermin: The granting of planning permission by Meath County Council (prior to issue of refusal) to this facility in such close proximity to housing estates is inexcusable considering the public health implications posed by the predictable rise in the rat population. A tenfold increase in tonnage will clearly aggravate these dangers.*

Comment:- Nuisance associated with vermin is not considered to be likely. The facility will not be handling putrescent waste. However, the RD requires a vermin control programme.

(iv) *Flooding: Flooding has been a feature of life in Dunboyne for many years, with serious floods in 2000 and 2002. The treatment of hazardous waste poses a considerable threat to the quality of ground water in the area if the facility was to fall victim to floods.*

Comment:- The RD requires an emergency response procedure which shall consider the risk from flooding. Hazardous wastes shall be accepted at the civic amenity only and shall be stored in appropriate containers. The CA shall be the last area of the site to flood due to its elevation. The risk of groundwater contamination by hazardous materials is considered low.

(v) *Hazardous waste: The discovery of asbestos during the demolition of the high rise blocks in Ballymun highlights the dangers inherent in the disposal of building waste. The treatment of potentially hazardous substances at this site, directly adjoining residential estates, with children playing on open spaces particularly vulnerable, is totally inappropriate*

Comment:- As discussed above the RD specifies requirements in relation to waste handling and acceptance procedures including the handling of unacceptable loads. The RD does not permit the acceptance of hazardous waste such as asbestos onto the site. Any unacceptable loads shall be stored in the waste quarantine area within the material recovery building prior to transfer to an appropriate facility.

(vi) *Policing: Meath County Council has demonstrated time and again its inability to properly enforce planning regulations. In her recent report the Ombudsman remarked that although Local authorities have significant powers to punish offenders, "there is no evidence to demonstrate that the determination to enforce the law is there". Meath County Council has, in this case, once again failed in its duty of care to the people of Dunboyne. They have no faith in the fitness of the Council to monitor this site and they look to agencies such as the EPA to defend their interests by rejecting the application.*

Comment:- The enforcement of planning condition and permit conditions is a matter for the Local Authority.

### 13.3 Submission from Dunboyne Alliance against the Dump

(i) *Intolerable smells, noise, dust and vermin, 100 waste skip trucks through the village daily, six days per week.*

Comment:- Putrescent material will not be accepted at this facility. Odours and vermin are not expected to be a significant aspect to this facility. The RD sets sound pressure limits at any noise sensitive location and specifies limits for air pollutants to mitigate significant impact. Traffic is a matter for the planning authority.

(ii) *This is a small village community and three housing estates are less than 150 metres from the operation and there are several hundred houses within a half Km. Two school*

*with nearly 1500 students are just a half kilometre away. Already garbage is being dumped on the roadside adjacent to this operation. We urge you not to grant permission for this as it will destroy our village.*

Comment:- Household 'black bin' waste shall not be accepted at this facility. The RD sets out requirements in relation to litter control. In relation to site selection the draft BAT Guidance Note specifies that the basic requirement is that the facility will not cause environmental pollution. The operation of the activity in accordance with the conditions of its waste licence shall not cause significant environmental pollution.

#### 13.4 Submission from North Eastern Health Board (2)

Two submissions were received from the North Eastern Health Board. The second submission was on foot of additional information and referred to the first submission. The Board has no objections to the proposed licence application provided the Agency includes in any licence thirteen conditions which the Health Board consider appropriate.

Comment:The RD specifies conditions that meet or are stricter than the objectives of the conditions proposed by the North Eastern Health Board excepting points (i), (ii), (iv), (v) and (xii). These are detailed below:

*(i) Only solid, dry, non-hazardous wastes, as specified in the EIS are to be accepted at the facility. Every load of waste shall be examined and visually inspected on arrival at the site. Any non-conforming loads shall be detained in the quarantine area and suitably disposed of by a person or company licensed for that purpose by a local authority.*

*(ii) All hazardous wastes shall be stored on imperious bases, which are surrounded by tight bund walls. All drainage from banded areas shall be diverted for collection and safe disposal.*

*(iv) All waste accepted into the transfer station for compaction shall be compacted within 12 hours.*

*(v) At the end of the working day the floor of the transfer station, the hopper and the compactor will be cleaned of all waste.*

*(xii) The licensee shall, prior to the date of commencement of waste activities on site, submit a written emergency response procedure (ERP) to the EPA for its agreement. The ERP shall address any emergency situation which may originate in the facility and shall include provision for minimising the effects of any emergency on the environment.*

The RD allows the acceptance of household hazardous waste at the civic amenity as proposed in the application. The RD requires hazardous waste to be stored in covered receptacles. Waste accepted at the Transfer Station is primarily for segregation of recyclables. The segregation process automatically delivers the paper and plastic fraction to a hopper and enclosed container. The transfer station contains storage bays for waste and therefore cannot be cleared of waste at the end of each working day however the RD includes conditions which require the floor of the materials recovery building to be washed down and cleared of waste at end of each day and for the storage bays to be washed and cleaned when emptied.. The paper/plastic compactor is also a storage container and therefore cannot be cleared of waste. The RD does require that the inspection floor shall be cleared every day and waste for disposal shall be removed within 48 hours. The RD requires that an emergency response procedure to be in place within six months and this is considered appropriate.

#### 13.5 Issues raised in additional comments to template letters and submissions from six parties

A number of issues are common to various submissions and these are grouped and considered below.

*(i) Traffic: congestion, safety issues, noise and dust associated with traffic. The village of Dunboyne is not suitable place to locate a facility of this size due to the heavy volumes of traffic it will generate. The traffic hazards would be intolerable. The village has long suffered HGV traffic avoiding the tolls on the M50. Traffic has increased with the expansion of the village and there has been an enormous increase in the HGVs. Thorntons proposal would exasperate the traffic situation. The potential extra movement of HGVs through Dunboyne village will be equivalent of 200,000 tonnes (based on number of movements).*

Comment:- Traffic is a matter for the Planning Authority.

*(ii) Property value affected: difficult to sell houses already.*

Comment:- The devaluation of properties is outside the scope of the licensing process.

*(iii) Nuisances: Dust and litter pollution, netting used at other sites, dust and litter on the adjacent green area. Vermin & pests nuisances. It gives rise to pests vermin, noise and smells. The facility is located too close to residential areas and that a facility handling 50,000 tonnes of materials will invariably attract a large volume of vermin, emit foul odours and create noise and dust thereby threatening the health and safety of a large number of residents nearby. Intolerable vermin, dust, noise, smells nuisance.*

Comment:- The RD sets out noise, dust and particulate matter limits that will not cause significant environmental pollution. The limits observes relevant air quality standards and BAT. The RD requires all loads to be covered. The RD requires litter control measures. Vermin, pest and odour nuisance are not considered to be a significant aspect of this facility as no putrescent material may be accepted. However, the RD requires nuisance monitoring, a vermin control programme and an odour management programme. The operation of this facility in accordance with the conditions of this licence shall not result in significant environmental pollution.

*(iv) Health: health of children, health risk associated with toxins, airborne disease. Health and safety grounds.*

Comment:- Aerosols or biological agents are not considered to be a significant aspect of this facility as no liquid waste or clinical waste may be accepted at the site. The RD specifies limits for dust and particulate matter that observe air quality standards and BAT. Health and safety is a matter for the health and safety authority in relation to on-site activities. If the activity is carried on in accordance with the conditions of this licence the activity will not cause significant environmental pollution.

*(v) Quality of life: detrimental to the quality of life, expense of smaller communities, moral decision which is owed to this community, our standards of life cannot be changed due to one companies commercial profit. Please do not do this to our village. The question is whether a commercial operation should be allowed to negatively alter the quality of life of 8000 residents due to traffic, noise, dust odours and visual effects.*

Comment:- Where the activity is operated in accordance with the conditions of its licence, it shall not cause significant environmental pollution. The facility includes a civic amenity which shall provide an important service to the local community.

*(vi) Proximity and sitting: house faces the site, close proximity to housing estates, waste disposal facility to locate beside our homes, farmland turned into a waste disposal site, toxic and dangerous facility situated in an already densely populated area. Would you like to live right beside a dump. Location is too close to the Gaelscoil and high density housing population. This facility is located in a village within 100m of hundreds of houses. It is inappropriate to place industrial waste disposal in a village setting. The community would welcome domestic waste recycling facility properly located like Navan. To site a large scale facility so close to residential areas is beyond belief. It is a good time that the EPA live up to the mission statement and do the right thing in order to protect the natural environment for this and future generations of residents. The business*

*is situated on land outside the development boundary of the village. This site is not operational under permit and is located on land adjacent to the industrial estate. This facility if granted permission to operate 50,000 tonnes p.a. is far too big and too close to residential areas.*

Comment:- The proposed activity is for a materials recovery facility and civic amenity facility and not for a dump/landfill. There will be no disposal of waste on-site. The facility will handle dry non-hazardous waste for the most part. Hazardous waste acceptance is restricted to household hazardous waste materials delivered to the civic amenity.

Siting is primarily a matter for the Planning Authority. However, the BAT Guidance Note for the Waste Sector: Waste Treatment Activities (draft April 2003) specifies that the basic requirement in site selection is that the facility will not cause environmental pollution. The activity, if carried out in accordance with the conditions of this licence, will not cause significant environmental pollution.

*(vii) Fit and proper: the reasons that the plant was built in the first place are false, only got planning permission for a small site, very underhand looking for a bigger plant. How can permission be granted to a company who promised in writing only a short time ago to set up a domestic recycling plant handling 5000 tons a year and before it is even built are now applying for 50,000 tons of waste a year. The applicants past record with Planning Regulations is deplorable SEE Copy of DUMP NEWS. This would seem to be appalling by the back door i.e. get permission for 5000 tonnes first and before the facility is even up and running apply for a 10 fold increase, I can't say I'm surprised. The propriety Director Mr. Padraig Thornton and his company do not have a satisfactory legal record to be granted a waste licence. I enclose a copy of Dump News date March 2001. PTWDL has a deplorable record (a copy of Dump news attached). They are on public record of having been through the courts, including the High Court, on numerous occasions in relation to waste disposal matters. The EPA have had their problems with the applicant. The mission of the EPA is 'to protect and improve the natural environment for present and future generations, taking into account the environmental, social and economic principles of sustainable development'. If this facility is allowed to develop what kind of environment would we be creating. Thorntons having gotten permission to recycle 5,000 tonnes of waste annually as a Civic Amenity have decided that there is no need for this Civic amenity for the area, as they never opened the facility. Permission for the lower amount opened the door to allow for the much larger commercial operation. This is patently underhand.*

Comment:- The Agency is responsible for determining waste licence applications. The application is for a materials recovery facility and civic amenity facility. The *Dump News* article relates to legal proceedings under the Planning Acts and as such would not form part of the fit and proper person considerations. As required by the Waste Management Act, 1996 the applicant was assessed for fit and proper person requirements and was found to be satisfactory.

*(viii) Scope of proposal: During the original planning permission process PT always maintained that this site was for local use only yet now he intends to use it as a base for a much wider area. Originally when he was asked why he was using a large site for a small operation with only 2/3 employees he stated that this was because of the nature of the area. The facility is proposing to handle industrial waste from County Kildare and Co. Dublin. Meath Co.Co. has no obligations to facilitate these wastes from these other counties. The tonnage sought is in excess of the total county Meath volumes and this could not be justified on any grounds. Large commercial facility for industrial waste being trucked in from other areas and counties are not acceptable. It was supposed to be a "Civic amenity" employing 2 or 3 persons as per the original application. This is an industrial facility employing 15 persons.*

Comment:- The Agency is responsible for determining waste licence applications. This application is for a materials recovery facility and civic amenity facility. The proposal is

considered to be in accordance with the objectives of the Meath Waste Management Plan and the Regional Planning Guidelines for the Greater Dublin Area 2004 to 2016 (July 2004).

*(ix) This is not a civic resource, 50,000 then increase to what. Does Meath Co Co have the power to control/monitor the site. Where all aspects of first planning application met i.e. was archeologically report completed. EPA survey completed.*

Comment:- The Office of Environmental Enforcement within the EPA is responsible for enforcing waste licences. Planning permission conditions is a matter for the Planning authority.

*(x) Lack of quantitative data regarding current 5000 tons impact. The impact of 5000 tons plant should be ascertained prior to allowing any escalation in the processed volumes. In addition to point 9; the EPA acknowledge that they cannot differentiate between construction waste versus the more hazardous demolition waste. If the plant accepts waste from Kildare this will bring potentially dangerous waste right through the centre of the village passing 2-3 playgroups for children. It is more friendly to our local environment and our health if the increase in tonnage occurs after the ring road opens in 2007 when alternate entrances to the plant can be created.*

Comment:- The Agency is responsible for determining waste licence applications. The Agency has available considerable knowledge, experience and resources in the performance of its functions. The environmental impact of a waste activity accepting 50,000 tonnes per annum is known. As outlined above, the RD specifies requirements in terms of waste handling and acceptance procedures including procedures for unacceptable wastes. The RD also specifies the type and nature of wastes to be accepted. All waste trucks shall be covered. Traffic issues are a matter for the Planning Authority. Trees and plants are proposed on the southern and eastern boundaries.

*(xi) Low lying phylons. If there is a fire, disastrous for Plunkett Hall and Lutterell Hall. Don't have a fire station in Dunboyne. This increased tonnage will demand a high consumption of high voltage electricity.*

Comment:- The hazards associated with low lying phylons is a health and safety matter for the company. Fire risk is a matter for the Planning Authority. The site is remote from other buildings and the risk of fire spread is low. The site contains an ESB substation which will facilitate energy demands.

*(xii) I would not be surprised if there is tribunal in years to come to find out how a company got permission for 5000 tonnes, builds a plant for way in excess of this then has the cheek to apply for 50,000 tonnes before opening.*

Comment:- Meath County Council is responsible for issuing waste management permits in its functional area. The Agency is responsible for determining waste licence applications.

*(xiii) The existing building is a total eyesore and facing out to the houses in Lutterall Hall. No effort was made to have the back of the building facing Lutterall Hall or sheeting the building in a more environmentally friendly product. The lean two annex should be pulled down. Called to provide large mature trees to border the site.*

Comment:- Landscaping is primarily a matter for the Planning Authority. The proposal does not alter the physical appearance of the facility already granted planning permission and a waste permit. However, planting on the southern and eastern boundary shall provide screening upon maturity.

*(xiv) Common sense should prevail when Mr. Thornton has made his money we will be left with a site close to homes and schools that will resemble the mess in Ballyfermot that fire brigades could not put out last December. Should this go ahead I will personally deliver some of the rats to yourselves as I think this would only be fair if we have to live with them why not you too. Doctors bills etc will be forwarded as a bill for the devaluation of property, and anything else that should come up. It would be nice if you could do the job of protection for all.*

Comment:- The RD requires the safe closure of the site upon cessation of the activity. The RD requires a vermin control programme. The RD specifies limits for particulate matter and dust that observes air quality standards and BAT. The devaluation of property is outside the scope of waste licensing. The operation of the activity in accordance with the conditions of the waste licence shall not result in significant environmental pollution.

*(xv) Floods in 2000 and 2002 caused several homes to be destroyed and the families to be evacuated.*

Comment:- The RD requires an emergency response procedure which will address the risk of flooding.

#### **14. Recommendation**

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached RD and for the reasons as drafted.

Signed

---

Ann-Marie Donlon

#### **Procedural Note**

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2003.

Appendix 1: Submissions

No.	Signatures	Signatures	Address	Notes
1	Anonymous			
2	Dunboyne Alliance against the Dump		St Patricks Park	
3	North Eastern Health Board			
4	Maria Murphy		Lutterell Hall	
5	Eileen Cogan		Millfarm	
6	Patrick Egan		Plunkett Hall	
7	R O Dulaing	A Mc Donald	Lutterell Hall	
8	James Barry		Lutterell Hall	comment
9	T Finlay	G O Reilly	Lutterell Hall	
10	R Hennessy	E Mc Aloon	Lutterell Hall	
11	C Redmond		Lutterell Hall	
12	L Hemeryl		Lutterell Hall	
13	G Nugent	T O Sullivan	Lutterell Hall	
14	J Branagan	A Branagan	Lutterell Hall	comment
15	D Kealy	P Kealy	Lutterell Hall	
16	S warfield	J Warfield	Lutterell Hall	comment
17	K Finn	M Finn	Lutterell Hall	
18	K Delaney	J Delaney	Lutterell Hall	
19	G Leahy	C Leahy	Lutterell Hall	
20	S O Connell	P O Connell	Lutterell Hall	
21	M Mc Gee		Lutterell Hall	
22	M ahern	G Ahern	Lutterell Hall	
23	R Kennedy	L Kennedy	Lutterell Hall	
24	S Kavanagh	D Greaves	Lutterell Hall	comment
25	C Mc Donnell	D Mc Donnell	Lutterell Hall	
26	S Flynn	P flynn	Lutterell Hall	
27	H Rogers	B Rogers	Lutterell Hall	
28	E melody	M Bennett	Lutterell Hall	
29	J Ryan	D ryan	Lutterell Hall	
30	D mc Connail	D Mc Connail	Lutterell Hall	
31	D Govender	J govender	Lutterell Hall	
32	m dungan	B sherlock	Lutterell Hall	
33	F monahan	P Monahan	Lutterell Hall	comment
34	M duggan	L Duggan	Lutterell Hall	
35	R Boughton	C Boughton	Lutterell Hall	comment
36	D finlay	S Finlay	Lutterell Hall	comment
37	V carley	S Keogh	Lutterell Hall	
38	B scott	C Fox	Lutterell Hall	
39	C fagan	F Fagan	Lutterell Hall	
40	K Hayes	M hayes	Lutterell Hall	
41	T O Malley	J O malley	Lutterell Hall	
42	F Barnes		Lutterell Hall	
43	J Skelly	A Skelly	Lutterell Hall	
44	H Battersby	N Battersby	Lutterell Hall	
45	D Mc Inerney	R Mc Inerney	Lutterell Hall	comment
46	B Dolan	N Dolan	Lutterell Hall	
47	A Cunningham	D Cunningham	Lutterell Hall	
48	D sinnott	G Mc Feat	Lutterell Hall	
49	R Regan	M Kirwan	Lutterell Hall	
50	m long	E Long	Lutterell Hall	
51	S Mc Clure	T Mc Clure	Lutterell Hall	
52	I kennedy	T dillon	Lutterell Hall	comment
53	M Salerno		Lutterell Hall	comment
54	J hackett		Lutterell Hall	
55	B Cunningham	D Cunningham	Lutterell Hall	comment
56	R Gorby		Lutterell Hall	
57	P Smith	C Cunningham	Lutterell Hall	
58	C Ebbs	R Ebbs	Lutterell Hall	



59	C Maher	F Maher, G Maher	Lutterell Hall
60	B Mulvany		Lutterell Hall
61	J Ryan	A O Toole	Lutterell Hall
62	J sherman	B Reilly	Lutterell Hall comment
63	K hennessy	A hennessy	Lutterell Hall
64	P keating		Lutterell Hall
65	P O Neill	R O Neill	Lutterell Hall
66	H O Reilly	J O Reilly	Lutterell Hall
67	V Brady	S Brady	Lutterell Hall comment
68	N Mullen	C Mullen	Lutterell Hall
69	B Gregan	R Gaughran	Lutterell Hall
70	M Rowan	P Rowan	Lutterell Hall
71	B Kavanagh	C Kavanagh	Lutterell Hall
72	T Fogarty	N O Brien	Lutterell Hall
73	E Smyth		Lutterell Hall comment
74	J Fitzsimons	V Markey	Lutterell Hall
75	D Kane	B Kane	Lutterell Hall
76	A Moran	K Moran	Lutterell Hall
77	C Kilbride, K lawlor	M Doran, T Walker	Lutterell Hall
78	J walsh	P Walsh	Lutterell Hall
79	B Lynch		Lutterell Hall
80	P harman	G Harman	Lutterell Hall
81	A Kennedy		Lutterell Hall
82	B Gogan		Lutterell Hall
83	L Farrell	D Farrell	Lutterell Hall
84	D Ring	D Ring	Lutterell Hall
85	J Hodgens	M Dillon	Lutterell Hall
86	D Whelehan	F whelehan	Lutterell Hall
87	R Doherty	M Doherty	Lutterell Hall
88	M Grant		Lutterell Hall
89	B Ebbs	B Ebbs	Lutterell Hall
90	S Doherty	U Doherty	Lutterell Hall comment
91	D Colohan	A Colohan	Lutterell Hall comment
92	J Hickey	C Hickey	Lutterell Hall
93	G Conlon	T Conlon	Lutterell Hall
94	A Mc Grath	D Mc Grath	Lutterell Hall comment
95	D Rooney	L Ronney	Lutterell Hall
96	C Murtagh, T Murtagh	M Nally	Lutterell Hall comment
97	B Rodden	M Higgins	Lutterell Hall
98	S Regan	M Regan	Lutterell Hall comment
99	T foster	G Foster	Lutterell Hall comment
100	C O Doherty		Lutterell Hall
101	S O Keefe	D O Keefe	Lutterell Hall
102	A Tracey		Lutterell Hall
103	R Carty	B Carty	Lutterell Hall
104	C Hayes	A Hayes	Lutterell Hall
105	F McGrath	p Curtin	Lutterell Hall
106	J Harrison	B Mallenco	Lutterell Hall
107	S Crabbe	J Crabbe	Lutterell Hall
108	M Skackna	I Barbic	Lutterell Hall
109	H Callans		Lutterell Hall
110	S Carrigan	L carrigan	Lutterell Hall
111	C Quigley		Lutterell Hall
112	A Kinsells	L Carolan	Lutterell Hall
113	D Boyne		Lutterell Hall
114	M Finlay	A Guckian	Lutterell Hall
115	L Collins	G Collins	Lutterell Hall
116	A Mc Cabe	T Mc Cabe	Lutterell Hall
117	V Wogan	C O Gorman	Lutterell Hall
118	D Mulholland	S Mulholland	Lutterell Hall

119	D Baggett	E Donaghy	Lutterell Hall	
120	J Canning	S Canning	Lutterell Hall	
121	M Geraghty	A Geraghty	Lutterell Hall	
122	U Bolton		Plunkett Hall	
123	W Brady	L Brady	Plunkett Hall	
124	M Kerr	A Kerr	Plunkett Hall	
125	N Nestor	R Nestor	Plunkett Hall	
126	V O Toole		Plunkett Hall	
127	B Tighe	A Tighe	Plunkett Hall	
128	T Braun	M Braun	Plunkett Hall	
129	S Mullen	H Mullen	Plunkett Hall	
130	C Cunningham		Plunkett Hall	
131	J Sheridan	M Sheridan	Plunkett Hall	
132	J Harper		Plunkett Hall	
133	D Dunning	G Dunning	Plunkett Hall	
134	L thomas	P Thomas	Plunkett Hall	
135	E Moran	S Moran	Plunkett Hall	
136	D Glesson		Plunkett Hall	
137	D Barker		Plunkett Hall	
138	A Fay		Plunkett Hall	
139	E Thorney	P Thorney	Plunkett Hall	
140	G Whelehan		Plunkett Hall	
141	P Mangan		Plunkett Hall	
142	S Nealon		Plunkett Hall	
143	S Cox		Plunkett Hall	
144	R robinson	R Robinson	Plunkett Hall	
145	N Smith	K Fagan	Plunkett Hall	
146	J Mahon	S Mahon	Plunkett Hall	
147	A Daly	P Daly	Plunkett Hall	
148	O Higgins		Plunkett Hall	
149	L Rogers		Plunkett Hall	
150	M Jones		Plunkett Hall	
151	L Grehan		Plunkett Hall	
152	C Norris	A Norris	Plunkett Hall	
153	J Tiernan	N Breslin	Plunkett Hall	
154	D O Connor	F O Connor	Plunkett Hall	
155	D Ahern		Plunkett Hall	
156	A Symth-O'Brien		Plunkett Hall	
157	S Brazil		Plunkett Hall	
158	C Manning		Plunkett Hall	
159	C Mahon		Plunkett Hall	
160	F O Leary	D Nic A Bhui	Plunkett Hall	
161	K Keegan	A Keegan	Plunkett Hall	
162	D Mc Cullough	M Kerley	Plunkett Hall	
163	G Campbell		Plunkett Hall	
164	B Mahady	M Mahady	Plunkett Hall	
165	A Connor	S Connor	Plunkett Hall	
166	S Mc Cormack	S Mc Cormack	Plunkett Hall	
167	A Kavanagh		Plunkett Hall	
168	B Thompson	S thompson	Plunkett Hall	
169	M O Connor	C O Connor	Plunkett Hall	
170	M Byrne	P Byrne	Lutterell Hall	comment
171	M Stewart	L Stewart	Lutterell Hall	comment
172	T O reilly	J O Reilly	Plunkett Hall	
173	M Scannell	E Scannell	Lutterell Hall	
174	A Merrick		Plunkett Hall	
175	I Patton	E Patton	Plunkett Hall	comment
176	Paula Higgins	M Healy	Millfarm	
177	R jackman	M Jackman	Millfarm	
178	G Mc Guinness		Millfarm	
179	R Mc Guinness		Millfarm	
180	R Hynes	R Hynes	Millfarm	

181	P murphy	C murphy	Millfarm	
182	S Butler	A Wogan	Plunkett Hall	comment
183	S Keenan Doyle	C Doyle	Millfarm	
184	J Smith	M Melly	Millfarm	
185	A Howlin	B Howlin	Millfarm	
186	K Mc Keon	R mc Keon	Millfarm	
187	A Power	S Power	Millfarm	
188	R Hayes	S Hayes	Millfarm	
189	L Mc Donnell	D mc Donnell	Millfarm	
190	A Dunne	P Dunne	Millfarm	
191	N Bailey	M Bailey	Millfarm	
192	M Meenan	S Meenan	Plunkett Hall	
193	D Quinn	D Quinn	Plunkett Hall	
194	D Orr	N Orr	Millfarm	
195	M o Meara	D O Meara	Millfarm	
196	N Fallon	T Fallon	Millfarm	
197	D Davis	P Davis	Millfarm	
198	S Kenna	S O Neill	Plunkett Hall	
199	J Mc Grath		Millfarm	
200	P Mc dermott	V Mc Dermott	Millfarm	
201	M O Neill	G Ward	Millfarm	
202	R Stafford	J Stafford	Plunkett Hall	
203	J Dempsey	G Dempsey	Millfarm	
204	J Bergin	B Bergin	Millfarm	
205	N O Loughlin	H Kissane	Millfarm	
206	J O Connor	J O Connor	Millfarm	comment
207	B Sheehan	D Sheehan	Millfarm	
208	J Cooling	C Cooling	Woodview Heights	
209	J Cooling	L Cooling	Woodview Heights	
210	J Travers	D Travers	Millfarm	
211	J Cullen	E Cullen	Millfarm	
212	D Galvin	P Galvin	Millfarm	
213	T Russell	C Russell	Millfarm	
214	M Phipps	J Phipps	Millfarm	
215	A Mc Crossan	G Mc Crossan	Millfarm	
216	D Clarke	E Brennan	Millfarm	
217	P Byrne	W Byrne	Millfarm	
218	C Mc Closkey	E Mc Closkey	Millfarm	
219	J Ring	E Ring	Millfarm	
220	P Murphy	M murphy	Millfarm	comment
221	D Symth	A Smyth	Millfarm	
222	J Doyle	J Doyle	Millfarm	
223	M Phelan		Millfarm	
224	M troy	E Troy	Millfarm	
225	M Reynolds	C Reynolds	Millfarm	
226	M Fitzgerald	C Fitzgerald	Millfarm	
227	S Crawley	J Crawley	Millfarm	
228	E Keeggan	L Keegan	Millfarm	
229	P comerford	D Comerford	Millfarm	
230	W Morrin	G Davis	Millfarm	
231	P Martin	C Martin	Millfarm	
232	G Clancy	L Clancy	Millfarm	
233	R Bruen	V Bruen	Millfarm	
234	M Reeves	J Reeves	Millfarm	
235	P Mc Goldrick	A Mc Goldrick	Millfarm	
236	K Dunne	J Dunne	Millfarm	
237	C Farrell		Millfarm	
238	B kelly		Millfarm	
239	S O Neill	A O Neill	Millfarm	
240	W Carolan	C Carolan	Millfarm	
241	M O Sullivan	A Reynolds	Millfarm	
242	G Dunne	E Dunne	Millfarm	

243	A O Malley	P O Malley	Millfarm	
244	B Clarke	E Clarke	Millfarm	
245	J Dooley	R Doran	Millfarm	
246	V gunning	I Gunning	Millfarm	
247	P Ryan	G Ryan	Millfarm	
248	E Gethin	J Gethin	Millfarm	
249	A Mc Nally	L Mc Nally	Woodview Heights	
250	J Birmingham	T Birmingham	Millfarm	
251	T Walsh	W Walsh	Millfarm	
252	J Eager	A Glynn	Millfarm	
253	M Domican	C Domican	Chestnut Grove	comment
254	K Mc Donnell	G Mc Donnell	Millfarm	
255	B Drennan	S Drennan	Woodview Heights	
256	Darragh Donnelly		Hamilton Hall	
257	D Mooney		Hamilton Hall	
258	P Mc Connell		Millfarm	
259	G Kennedy	L Kennedy	Millfarm	
260	M Blackwell	A Terres	Millfarm	
261	R Materson		Millfarm	comment
262	C Connon	P Connon	Chestnut Grove	
263	M Richardson	B richardson	Millfarm	
264	S Maguire	A maguire	Millfarm	
265			Millfarm	
266	E Behan	K Behan	Chestnut Grove	
267	M O Hara	J O Hara	Chestnut Grove	
268	G Foody	M Foody	Chestnut Grove	
269	M Jenkinson	P Jenkinson	Chestnut Grove	comment
270	P Ryan	T Ryan	Chestnut Grove	
271	F Colley	E Colley	Chestnut Grove	
272	L Hurson	B Hurson	Chestnut Grove	
273	S Latham	J Mc Loughlin	Millfarm	
274	S Laaly		Millfarm	
275	E Sommerville		Warnestown	
276	A Wogan		Plunkett Hall	
277	D Garrett	R Garrett	Millfarm	
278	B Walsh		Summerhill road	
279	North Eastern Health Board			