

BORD NA MÓNA

BORD NA MÓNA ENVIRONMENTAL LIMITED

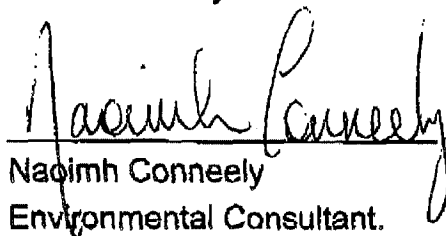
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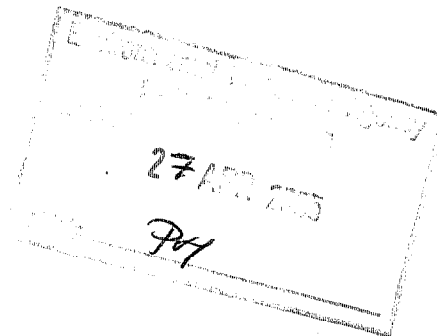
To:	Ms. Perneale Hermansen	From:	Ms. Naoimh Conneely
Company:	EPA	Company:	Bord na Móna Environmental Ltd
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Date:	27 April 2005	Pages:	1
Ref:	Revised NTS for Waste Licence Application (Reg. No. 152-3) for the Oxigen Environmental Ltd. site at Robinhood Industrial Estate, Dublin.		

Dear Perneale,

Please find attached the revised non-technical summary as discussed earlier. Should you have any further questions or queries regarding the attached please do not hesitate to contact myself.

Yours sincerely


Naoimh Conneely
Environmental Consultant.



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

Oxigen Environmental Ltd. are applying to the Environmental Protection Agency to review the existing waste licence, to change the use of the facility from a multi treatment waste facility (i.e. waste sorting, recycling) to a single treatment waste baling facility, and to an increase the volume of waste accepted at the facility from twenty four thousand and six hundred tonnes of industrial, commercial, household and construction and demolition waste to one hundred and sixty thousand tonnes of municipal and commercial waste.

It is intended to upgrade the existing waste facility to a single treatment (i.e. baling of waste) waste facility at Robinhood Road, which will allow Oxigen Environmental Ltd. to provide the necessary service to its other waste facilities, as well as to Local Authority and suitably permitted/licenced private waste contractors. Planning permission for the operation of a waste facility (SD01A/0226) and for the provision of the necessary site infrastructure (SD02A/0382) has been granted by South Dublin County in June 2001 and November 2002 respectively.

The site was previously owned by South Dublin County Council, and had been operated as a cleansing depot for county council waste vehicles. The site was purchased by Oxigen Environmental Ltd. in 1999, where the site was operated as a waste facility under a waste permit granted by South Dublin County Council. In 2001 Oxigen Environmental Ltd. applied to the Environmental Protection Agency for a waste licence to operate a waste transfer facility at the site. A waste licence (Register No. 152-1) was granted in 2001, which permits the acceptance of commercial, industrial, household and construction and demolition waste, to a maximum volume of 24,600 tonnes per annum.

The site is located in the administrative area of South Dublin County Council and is zoned "E - *To provide for industrial and related uses*" under the existing County Development Plan, 1998, and is zoned "E - *to provide for enterprise, employment and related uses*" under the draft County Development Plan 2004 - 2010. Under these

zoning codes the 'Refuse Transfer Station' are classed as being '*permitted in principle*'.

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

Currently, the site is covered by an impervious hardstand cover and there is no exposed soil/green area on site. The site is adjoining an area of historic quarrying and the site itself may have had been subject to quarry activities in the past. The site is located where the old pumping station for Walkinstown is located; this would have required the backfilling of the adjacent quarry to allow for the foundations of the pumping station. As a result of this, the subsoil beneath the site may have been altered.

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

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

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

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

Proposed Review of On-site Operations:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Emissions

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

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

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

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

Potential air emissions are examined under two separate headings:

- i. Traffic Emissions
- ii. Dust

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

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

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

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

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

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

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

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

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

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

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

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

Oxigen Environmental Ltd.

Waste Licence Application

Register No. 152-3

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

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

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

A dedicated Facility Manager and two Assistant Facility Managers shall be employed at the site and shall ensure that operations at the site are undertaken with minimal impact on the environment and in accordance with any Waste Licence Conditions that may be governing the site. The management of the site shall have completed all relevant training and awareness courses (such as the FAS Waste Management course), and shall have a suitable amount of experience in the waste management sector. All managers and assistant managers at the site are to be supplemented by an experienced management team within the Oxigen Environmental Ltd. company, which will ensure that all aspects of waste management within the Robinhood Industrial Estate site are undertaken responsibly.

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

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