

Attachment A - Non Technical Summary

As required by Article 12 (1) (q) of the Waste Management (Licensing) Regulations, 2000 a non technical summary is provided below which contains information on the matters listed in article 12(1)(e) to (p).

A.1 Nature of the Facility

This section relates to Article 12(1)(e)

Seamus Kelly & Sons (SK&S) operates a waste management centre at Gorey Business Park, Ramstown, Gorey, Co. Wexford. The facility is primarily used as a recycling centre for construction and demolition waste, commercial and industrial waste and household waste.

In response to a marked demand for recycling services in the south-eastern waste management region, the Company intends to expand the existing facility to allow for an increase in the volumes of waste handled and recycled at the facility. A waste licence is required to allow the expansion of the waste management centre and this environmental impact statement (EIS) will accompany SK&S application for the licence review.

The facility currently handles household, commercial, industrial, and construction and demolition waste as described above. All wastes handled are non-hazardous in nature. Recycling at the facility comprises recovery of paper, wood, cardboard, metal, plastic and construction and demolition materials. There is one picking lines for the recovery of construction and demolition waste. This picking line can also be used for the recovery of other waste types. Any non-recyclable waste is bulked up on the premises and transferred to licensed landfill sites in covered trailers. SK&S also provide a service for the collection of dry recyclables from householders and the Company hopes to expand this service in the region.

The existing facility consists of one main building dedicated to waste handling which also houses the office areas, canteen and changing rooms. The site also contains a weighbridge, a weighbridge cabin, toilets, vehicle wash bay, recycled materials storage bays and a fuel storage area.

The facility currently to handles approximately 16,500 tonnes per annum. The opening hours at the facility are from 8.00a.m. to 5.00 p.m. Monday to Friday and 8.00a.m. to 1:00p.m. on Saturdays. It is proposed to extend the opening hours to 7:30am to 6:30pm Monday to Friday and from 8:00am to 2:00pm on Saturdays. This Waste Licence Application includes a proposal to increase the current licensed tonnage to 30,000 tonnes per annum over five years. The proposed changes to the facility include a proposal to construct a new building which will cover the entire site ensuring all activities take place indoors.

The Banoge River to the east of the site which drains into a tributary of this river. The site is located within 1km of the N11 Dublin to Rosslare road. Surrounding activity is primarily industrial, with mixed agriculture and some residential developments.

The facility design, operation and management is fully described at Section 3 of the Main Text of the EIS that accompanies this Waste Licence Application, and on Figures and Drawings that are enclosed.

A.2 Classes of Activity

This section relates to Article 12(1)(f)

In accordance with the Third and Fourth Schedules of the Waste Management Act, 1996 (WMA, 1996) the following classes of activity will be carried out on the site:

Third Schedule-Waste Disposal Activities

11. *Blending or Mixture prior to submission to any activity referred to in this (Third) Schedule.*
12. *Repackaging prior to 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 (Third) Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.*

Fourth Schedule-Waste Recovery Activities

2. *Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).*
3. *Recycling or reclamation of metals and metal compounds.*
4. *Recycling or reclamation of other inorganic materials.*
11. *Use of waste obtained from 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 of waste intended for submission to any activity referred to in a preceding paragraph of this (Fourth) Schedule, other than temporary storage, pending collection, on the premises where the such waste is produced.*

A.3 Quantity and Nature of the Waste to be Disposed

This section relates to Article 12(1)(g)

The SK&S facility handles commercial, construction and demolition, industrial and household wastes. The Company handles 16,500 tonnes per annum of non-hazardous waste. It is proposed to increase the amount of waste handled to 30,000. It is expected to recycle approximately 50% of this material.

A.4 Raw and Ancillary Materials, Substances, Preparations used on the Site

This section relates to Article 12(1)(h)

The main raw materials used on site are diesel, well water and electricity. Minor amounts of engine oil and hydraulic oil are used in the day-to-day operation of the facility. The quantities are provided in Section 3.5.7 of the EIS.

A.5 Plant Operating Procedures

This section relates to Article 12(1)(i)

The facility is currently operates from 8:00 am to 5.00 pm Monday to Friday and from 8:00am to 12:30pm on Saturday. The Company employs a total of 35 full time staff. Plant currently used at the facility includes 1 (No.) trommel, 1 (No.) front end loaders, 1 (No.) timber shredder, 1 (No.) forklift, 1 (No.) picking station, 1 (No.) shredder, 1 (No.) cardboard baler. It is proposed to purchase 1 (No.) new telehandler with claw and 1 (No.) excavator.

Waste processing operations on site are currently carried out in the existing waste recycling building. Skip waste from commercial premises and construction and demolition sites is segregated on the floor of processing yard and processed on the picking line. Metal and wood are extracted for recycling and stored in the recycling bays in the yard area. Cardboard is segregated and baled for transfer to markets. Residual waste is sent to landfill.

The Company will agree all processes and engineering works in advance with the EPA.

The site will be operated and monitored in accordance with conditions issued by the EPA and specified in the Waste Licence. Regular environmental monitoring will be carried out and an annual status report will be prepared and submitted to the EPA.

A.6 Emissions

This section relates to Article 12(1)(k)

The potential emissions from the facility are divided into emissions to air, groundwater, surface water and noise emissions.

Emissions to Air

See Section 3.7.1 of the EIS

Emissions to Groundwater

See Section 3.7.2 of the EIS

Emissions to Surface Water

See Section 3.7.3 of the EIS

Noise Emissions

See Section 3.7.4 of the EIS

A.7 Assessment of the Effects of Emissions on the Environment

This section relates to Article 12(1)(1)

The impacts on groundwater and surface water from effluent discharge and future noise impacts were seen as potential negative effects of the development and mitigation measures for each of these issues are proposed. It is predicted that there will be no significant adverse effects from the development after mitigation measures are in place.

A.8 Information related to Section 40(4) (a) to (d) of the WMA, 1996

This section relates to Article 12(1)(j)

A.8.1 Compliance with Emissions

Dust

There are no National or EU standards for dust deposition. By law the plant will be required to be in compliance with Air Pollution Act, 1987. The dust levels measured at the site were elevated when

compared to the EPA recommendation of 350 mg/m²/day, however, high dust levels were attributed to earth movement works taking place off-site and not associated with the SK&S facility. Dust emissions are not expected to pose a problem at the upgraded facility as the entire site will be roofed-in thereby preventing the escape of any dust.

Odours

Odours from the site have not been a problem in the past. For this reason it is not considered necessary to monitor odours at the site. There are no National or EU standards for odour emissions. In the event of receiving complaints from neighbouring premises with regard to odours, details will be taken on a complain form and appropriate remedial action will be taken to reduce odour emissions and this action will have regard to the principles of BATNEEC.

Noise

There are no legal limits currently in place for noise emissions from industry. The EPA have set a day-time guideline for L_{Aeq} of 55 dB(A) at sensitive locations. Mitigation measures for such negative impacts of the development are proposed.

Water

The risk to the groundwater posed by the activities at the site are considered insignificant and no groundwater monitoring is proposed.

A.8.2 Environmental Pollution

The design and operating practices that ensures that environmental pollution is avoided are listed below.

Risk to Waters is avoided by:

- All hydrocarbon tanks are and will be bunded.
- Only clean roof water will discharge to the surface water drains.
- Non-inert waste materials are, and will be, handled in a covered building with concrete floors.
- All hardstandings are, and will be, concreted.
- All foul water will be contained in underground storage tanks.

Risk to the Atmosphere is avoided by:

- The retention time of waste at the site is insufficient to allow formation of decomposition gases.

Risk to Land, Soil, Plants or Animals is avoided by:

- Risk to land and soil beneath the site is avoided by the same controls that avoid risk to Waters as described above.
- Risk to plants and animals is avoided by location of the development removed from areas of special ecological importance. The flora and fauna in the vicinity of the site are not considered sensitive to the site activities.

Nuisance through Noise, Odours or Litter is avoided by:

- All wastes will be handled in a contained building and all vehicles carrying these wastes are and will continue to be covered.
- Daily litter patrols are, and will be, carried out at the site.

These pollution control measures will also have the effect of reducing the nuisance of dust emissions from the site.

Adverse effects on the country side or places of interest are avoided by:

- Operating the site with adequate environmental controls.

A.8.3 - Best Available Technology not Entailing Excessive Costs (BATNEEC)

With respect to the SK&S facility the principal of employing BATNEEC is being applied in respect to emissions as follows.

SK&S has, and will, employ modern management practices and continue to commit financial resources in order to control all nuisance emissions and ensure protection of the environment. The existing modern management practices include transporting waste within covered vehicles, regularly cleaning site surfaces and regularly patrolling for litter.

The existing and proposed equipment on site such as picking lines, shredder, loading shovels, baler, compactor and weighbridge are examples of the best available technology for such facilities.

Specialist consultants have and will also be retained as required to monitor potential nuisances and all relevant environmental media set out by the EPA. The consultants will inform the company on a regular basis of improvements in pollution abatement or other relevant technology. The costs of the facility and adhering to the modern management practices are paid for out of SK&S's annual revenues or short term bank loans.

A.8.4 Fit and Proper Person

As stated in Section L.1, no employee of SK&S has been convicted of an offence under the Waste Management Act 1996.

As outlined in Section L.2, the Managing Director has 20 years experience in the waste business. Financial commitments may be required to cover decommissioning, aftercare management and environmental pollution. The Company's sound financial position and its ability to cover the cost of environmental issues at the site are outlined in Section L.3.

A.9 Monitoring and Sampling Points

This section relates to Article 12(1)(m)

The proposed monitoring is as follows :

Dust	-three times a year (twice in Summer and once in Winter)
Noise	-annually
Surface Water Discharge	-quarterly
Foul Water Discharge	-one load in four

A.10 Off-site Treatment or Disposal of Wastes

This section relates to Article 12(1)(n)

The destination of wastes currently leaving the facility are outlined in Section 1.7.2 of the EIS. All residual wastes that cannot be recycled are disposed of at licensed landfill sites.

A.11 Emergency Procedures to prevent Unexpected Emissions

This section relates to Article 12(1)(o)

In the event of unexpected contaminated water emissions, the surface water discharge pipes will be cut off with shut-off valves.

Additional measures outlining procedures to be taken in the event of emergencies are outlined in Section 3.10 of the EIS.

A.12 Closure, Restoration and Aftercare of the Site

This section relates to article 12(1)(p)

Operations at the facility are ongoing with an open ended life span and to date a closure plan has not been developed. In the event of the closure of the facility a closure plan will be developed as outlined in Attachment G.1 (and in Section 3.9 of the EIS).

For inspection purposes only.
Consent of copyright owner required for any other use.

Attachment B1 — Applicant Details

B.1.1 Company Information

The applicant is Seamus A. Kelly & Sons (SK&S). Seamus Kelly is a Sole Trader.

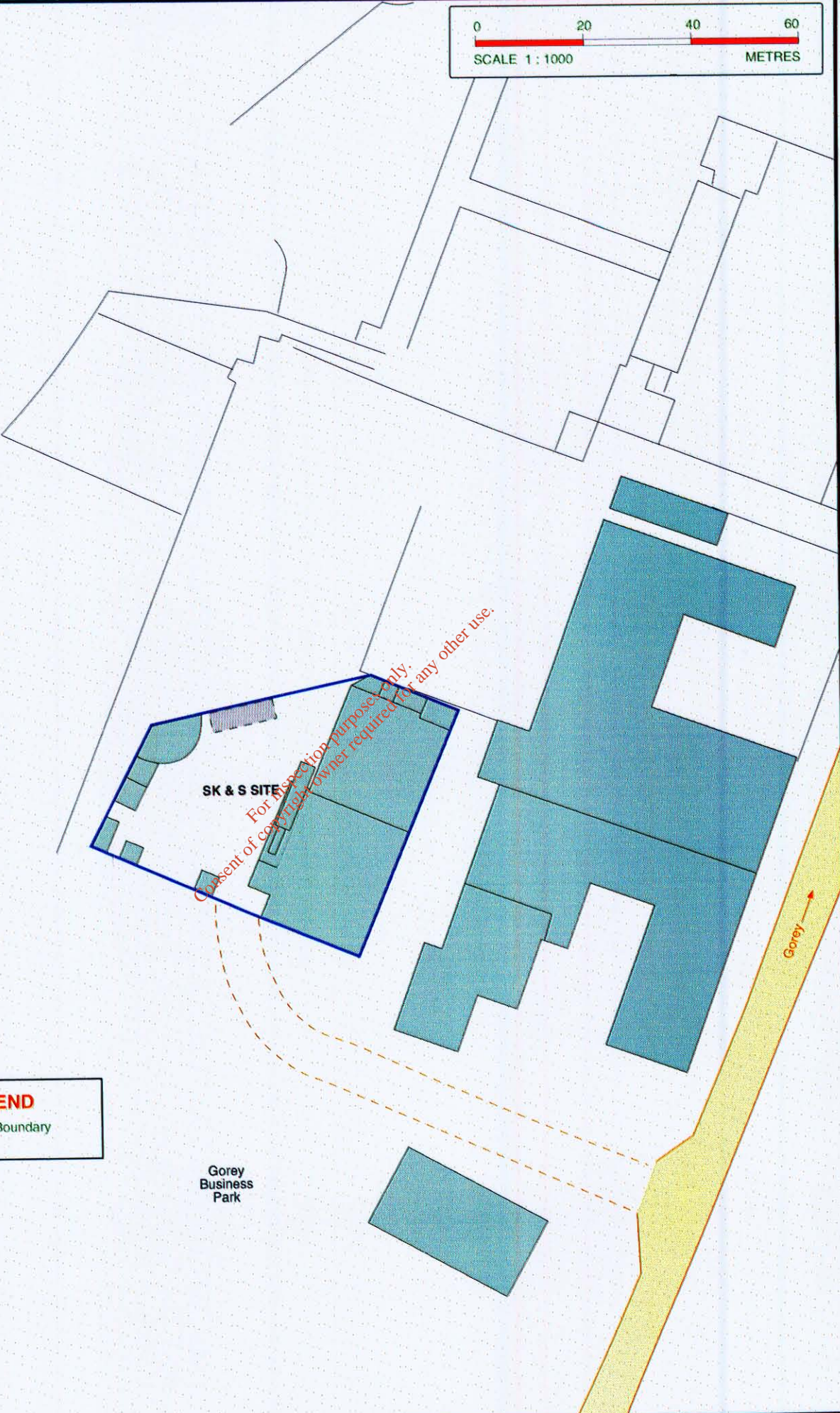
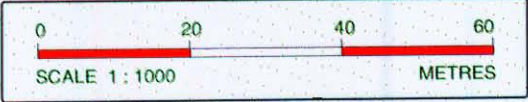
(c) The Company Manager owner is:

- (i) Mr Seamus A Kelly

B.1.2 Land Ownership

Figure B.1.1, which is drawn at a scale of 1:1000, shows the land ownership for the facility. The Applicant owns the land as detailed on the Application Form.

*For inspection purposes only.
Consent of copyright owner required for any other use.*



SK & S SITE

*For inspection purposes only.
Consent of copyright owner required for any other use.*

LEGEND

— Site Boundary

Gorey Business Park

Gorey →

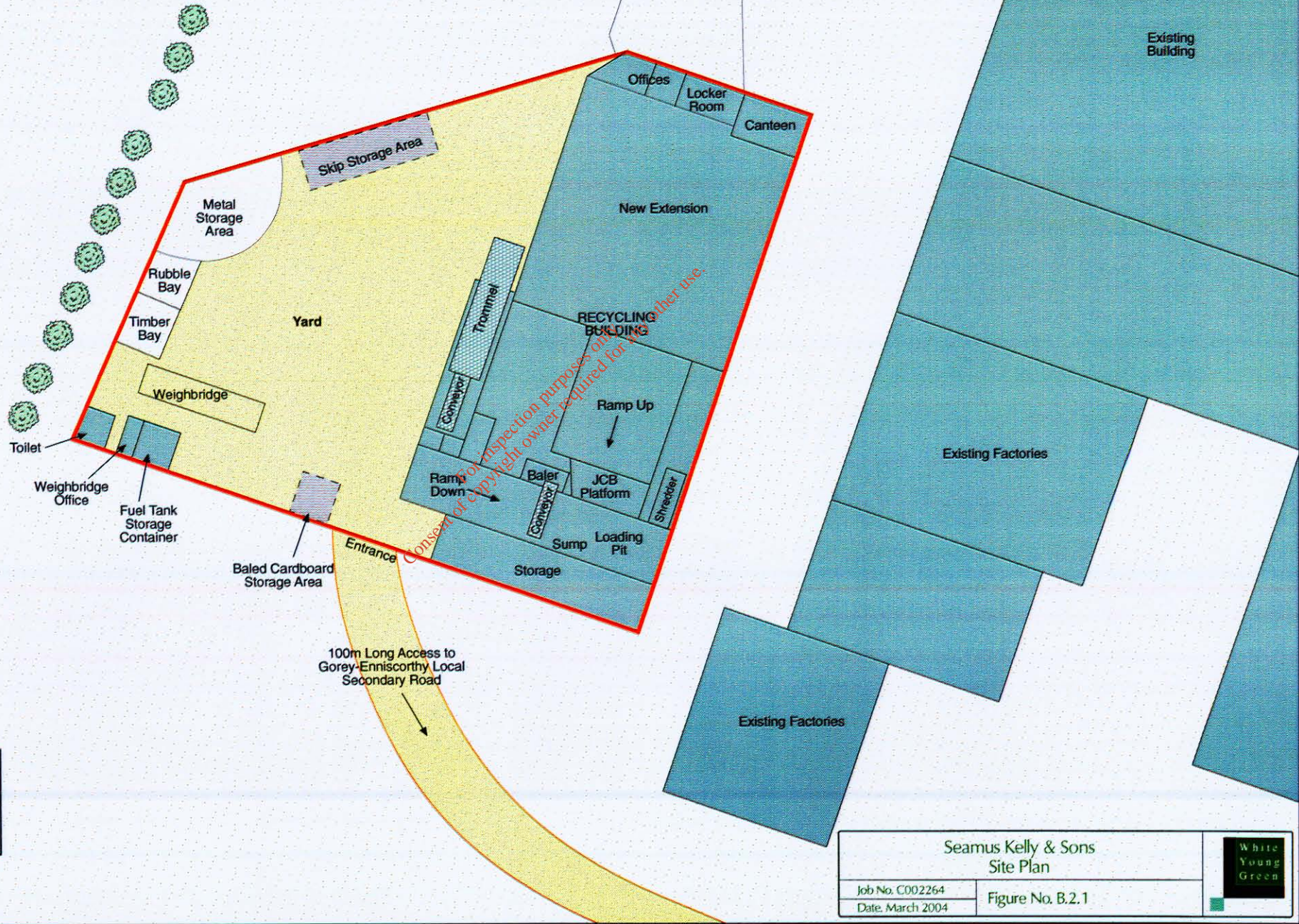
Seamus Kelly & Sons Site Location			
Figure No. B.1.1	Job No. C002264 Finalised By - AR	Date: Feb. 2004	

Attachment B.2 - Location of Activity

For the clarity of the EPA, the following should be noted:-

- The Site Plan is illustrated on Figure B.2.1, at a scale of 1:500. The boundary of the Site to which the licence application relates is outlined in red.
- The location of the site is shown on Figure B.2.2. at a scale of 1:2500. The boundary of the Site to which the licence application relates is outlined in red.
- The attached Ordnance Discovery Series Map No. 69 has the site location marked as a red X. The grid reference can be read from this map.

*For inspection purposes only.
Consent of copyright owner required for any other use.*



LEGEND

- Site Boundary
- Buildings
- Coniferous Trees

Seamus Kelly & Sons Site Plan		
Job No. C002264	Figure No. B.2.1	
Date. March 2004		

20'

15'

13 14 15 16 17 18 19 20 21 22

Aklow
16km / 10mils

