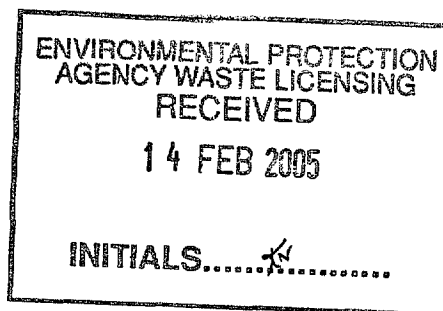


**Environmental**

Environmental Consultancy  
Hydrogeology  
Contaminated Land  
Management Systems  
Waste Management  
Health & Safety  
Geographic Information Systems

Licensing Unit,  
Office of Licensing & Guidance,  
Environmental Protection Agency,  
Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford



9<sup>th</sup> February 2005

RE: Register Number 202-1  
Ref: 202-1/Art14(2)(b)(ii) dated 17/01/05

Dear Sir/Madam,

Please find enclosed an original plus 2 paper copies and 11 CD-ROM copies of information requested for Article 14 Compliance for the above facility.

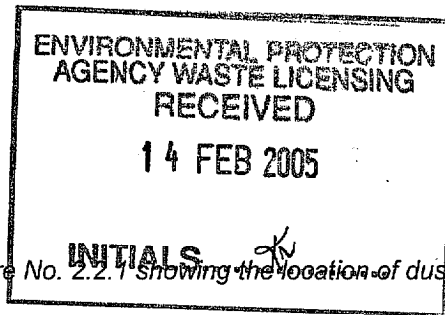
Yours sincerely,

**On behalf of Seamus Kelly & Sons**

Donal Marron MSc BSc PGeo  
Regional Director  
White Young Green

Apex Business Centre, Blackthorn Road, Sandyford, Dublin 18

■ Tel: +353 1 293 1200 ■ Fax: +353 1 293 1250 ■ Email: dublin@wyg.com ■ Website: www.wyg.com



C1 Air

Please provide Figure No. 2.2.1 showing the location of dust monitoring gauges D1, D2 and D4.

Please see Figure No. 2.2.1 enclosed in Annex 1 of this submission.

**C8 Noise**

- In addition to the tonal noise element recorded at a frequency of 5kHz at N6, the noise graphs show that a further tonal noise element was recorded at 63 Hz. Please provide an interpretation / explanation for these tonal noise elements given that noise from the business park was audible at monitoring locations N5 to N9 and the tonal elements recorded at N6 correspond to tonal noise elements recorded at on site locations N2 and N3.
- Further tonal noise elements were recorded at the following NSLs all of which correspond to tonal noise elements recorded on site. Please provide an explanation / interpretation therefore.

NSL	Frequency
N10	63 Hz
N13	250 Hz
	500 Hz
N14	1.25 kHz

- A noise survey was carried out at the Seamus Kelly & Sons facility on the 14<sup>th</sup> and 15<sup>th</sup> of October 2004. Four noise measurements were carried out at the site boundaries, N1 (southern boundary), N2 (western boundary), N3 (northwestern boundary) and N4 (outside the eastern boundary). The analysis of the 1/3-octave frequency spectra measured at each of the on-site noise monitoring locations shows that there is a general broadband noise spectrum associated with ambient noise generated in the vicinity of the facility. There are a number of frequency bands, which exceed their neighboring band by more than 5dB. It is reasonable to conclude that this is as a result of the operation of items of plant, reversing warning alarms and Heavy Goods Vehicle (HGV) movements on-site, loading trucks with metal.

The analysis of the 1/3-octave frequency spectra measured at noise monitoring locations N5 – N9, located to the northeast of the facility, shows that the frequencies at which the on-site tonal elements occur do not correspond to those at these points with the exception of N6. Tonal noise was recorded at a frequency of 63 Hz and 5kHz at noise monitoring location N6 which corresponds to the tonal noise element recorded at noise monitoring locations N2 and N3, located at the western and northwestern boundary of the facility respectively. This tonal noise element may be attributable to activities within the facility. The plan for the proposed facility is to cover the entire site so that all operations will take place indoors, thereby containing the operations and greatly reducing the potential noise impacts. Further noise mitigation measures will include fitting all vehicles and mechanical plant used for the purpose of works with exhaust silencers. Also machines in intermittent use shall be shut down in the intervening period between work or throttled down to a minimum. Mitigation measures such as these will help to ensure that noise from the site does not impact on the surrounding environment.

2. The noise levels recorded at the two potential noise sensitive receptors N13 and N14, located to the west of the facility were significantly influenced by existing background non-site road traffic. Tonal noise elements were recorded at these points which corresponded to tonal noise elements recorded at noise monitoring locations N1 and N3. However Seamus Kelly & Sons site activities were not audible at these locations during the monitoring period, the predominant noise sources at these monitoring locations were due to passing traffic on the adjacent N11 road. Therefore it is reasonable to conclude that the tonal elements at N13 and N14 are not attributable to site activities.

The noise level recorded at the potential noise sensitive receptor N10 within the nearby housing estate was influenced by distant road traffic noise and barking dogs within the estate. A tonal noise element was recorded at this point which corresponded to a tonal noise element recorded at noise monitoring locations N2 and N3. Seamus Kelly & Sons site activities were not audible at this location during the monitoring period. Therefore it is reasonable to conclude that the tonal element at N10 is not attributable to site activities.

As previously discussed in Point 1 the plan for the proposed facility is to cover the entire site so that all operations will take place indoors, thereby containing the operations and greatly reducing the potential noise impacts. A number of additional mitigation measures will also be in place during the operation of the facility to ensure that noise from the site does not impact on the surrounding environment.

## **D1 Site Infrastructure**

1 *Revised Figure No. 2.6.1 shows the surface water drainage in blue going to the drain at the site entrance however, documentation provided relating to the planning application states that the surface water is to be disposed of to existing surface water drain in centre of the existing yard. This proposal is supported in the site layout plan, which constitutes part of the planning application. Please clarify and revise Figure No. 2.6.1 accordingly.*

We confirm that earlier plans for the site including those submitted as part of the planning application showed roof drainage directed to a drain in the centre of the existing yard. However, it is considered that a superior method of discharging the roof drainage to the local storm water drain is to collect the roof drainage in the roof guttering and direct it down the sides of the building via downpipes directly to the storm water drain located just outside the site entrance. The roof drainage will not be in contact with any contaminated surfaces and will comprise pristine rainfall and will not require any treatment in silt traps or oil interceptors prior to its discharge to the storm drain.

The drain in the centre of the yard will be maintained and used for internal floor drainage inside the proposed new building. This drain will collect any leachate or floor washdown water generated inside the building and will be directed through the two 3-chamber interceptors and from there to the underground foul water storage tanks.

2 *Reproduce Figure No. 2.6.1 (site drainage) showing the precise location of the proposed wheelwash facility and corresponding drainage within the site.*

Figure 2.6.1 is attached in Annex 1. This shows the location of the proposed wheel wash just inside the site entrance. All trucks will be required to pass through the wheelwash when entering or exiting the site.

## **J5 Discharge to Sewer**

*In estimating the quantity of wastewater effluent arising from the toilet, canteen, floor wash, shredder and vehicle wash bay it is stated "it is planned that there will be 12 permanent staff on site". This conflicts with the waste licence application non-technical summary, which states that "the company employs a total of 35 full time staff". Please clarify this discrepancy in employee*

*numbers, and with an accurate final figure for staff numbers, estimate the quantity of wastewater effluent arising from the toilet, canteen, floor wash, shredder and vehicle wash bay.*

The company employs 35 full time staff in total. It is planned that there will be approximately 10 to 12 staff applied full time to operating the Recycling Centre facility. The remaining 23 to 25 staff generally comprise drivers and their assistants and will not normally be present at the site. It is possible that drivers transporting material to/from the recycling centre will make use of the washroom facilities on occasion, however, past experience at the site has shown that this comprises minor usage and would not provide a significant contribution to the overall wastewater volume generated at the site. Notwithstanding the above, it is considered prudent to assign an estimated volume of 150 litres/day to cater for drivers/assistants usage of the facilities.

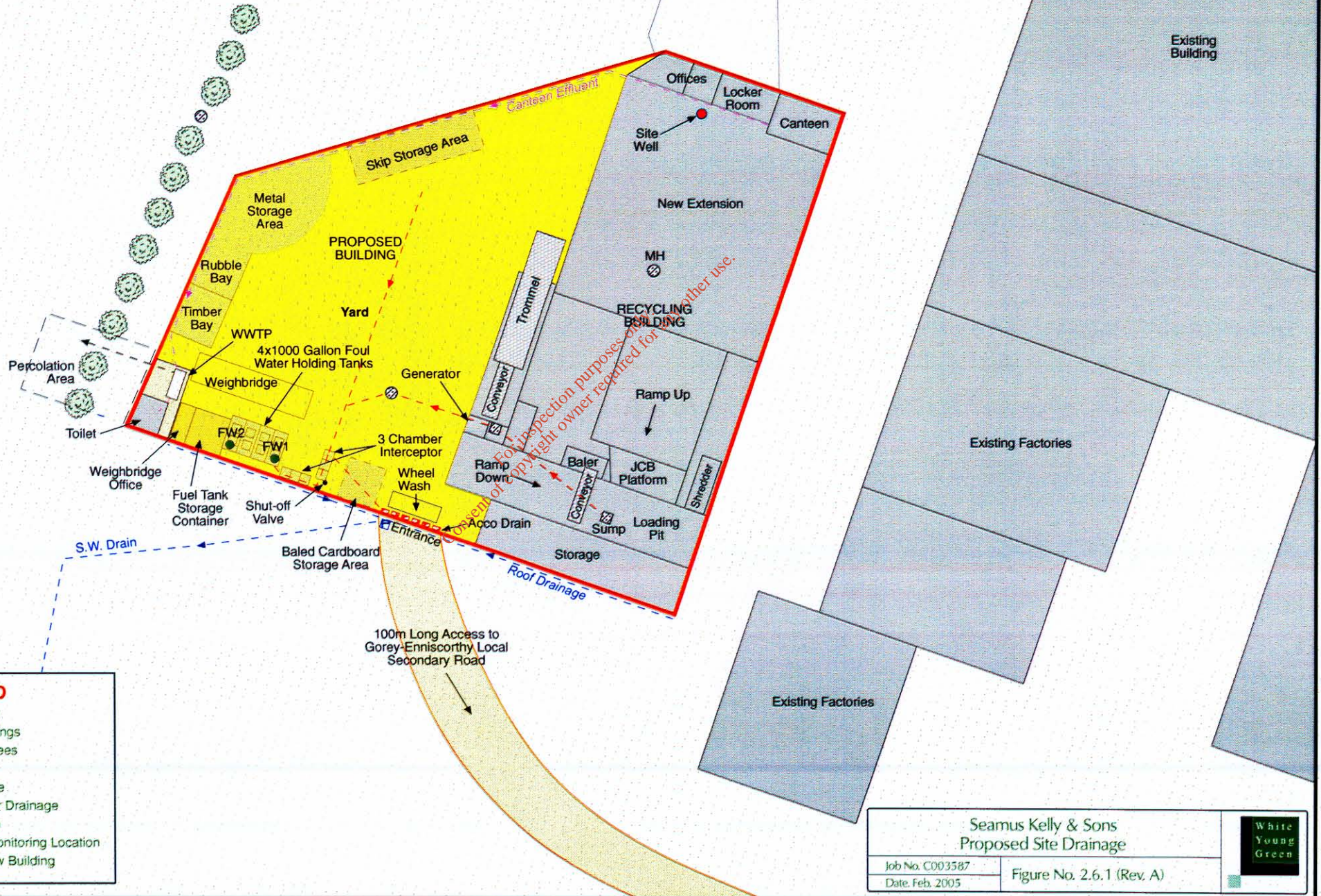
The 12 full time staff will generate 720 litres/day (60 litres/head/day) of wastewater. This will give a total of 870 litres/day wastewater generated at the site and is equivalent to approximately 4.6 population equivalents (189 litres/day = 1 PE). There will be no other wastewater inputs to the WWTP from the site.

The wastewater will be directed to the new wastewater treatment plant (WWTP) to be located in the southwestern corner of the site. The WWTP will be designed to cater for approximately 20 permanent staff and the effluent from the WWTP will be discharged to the percolation area as detailed in earlier submissions.

Wastewater generated by floor washdown or floor drainage and from the proposed wheelwash will be collected and managed in a separate system to the on-site WWTP. Wastewater from the floor washdown and wheelwash will be collected by internal floor drains and directed through two 3-chamber interceptors prior to storage in the four contained underground storage tanks located in the southwestern corner of the site. It is estimated that the volume of effluent from these sources will amount to some 5,600 L per month (4,000 L/month from the wheelwash and 1,600 L/month from floor washdown). The underground storage tanks have a capacity of 4,000 gallons or 18,000 litres. The effluent will be collected from the storage tanks on a regular basis and exported off site by road tanker for treatment at the wastewater treatment plant operated by Wexford County Council at Enniscorthy, Co. Wexford.



NOTE: Drawing is schematic. No measurements to be taken.



**LEGEND**

- Site Boundary
- Existing Buildings
- Coniferous Trees
- MH** Manhole
- Floor Drainage
- Surface Water Drainage
- Sewage Drain
- FW1** ● Foul Water Monitoring Location
- Proposed New Building

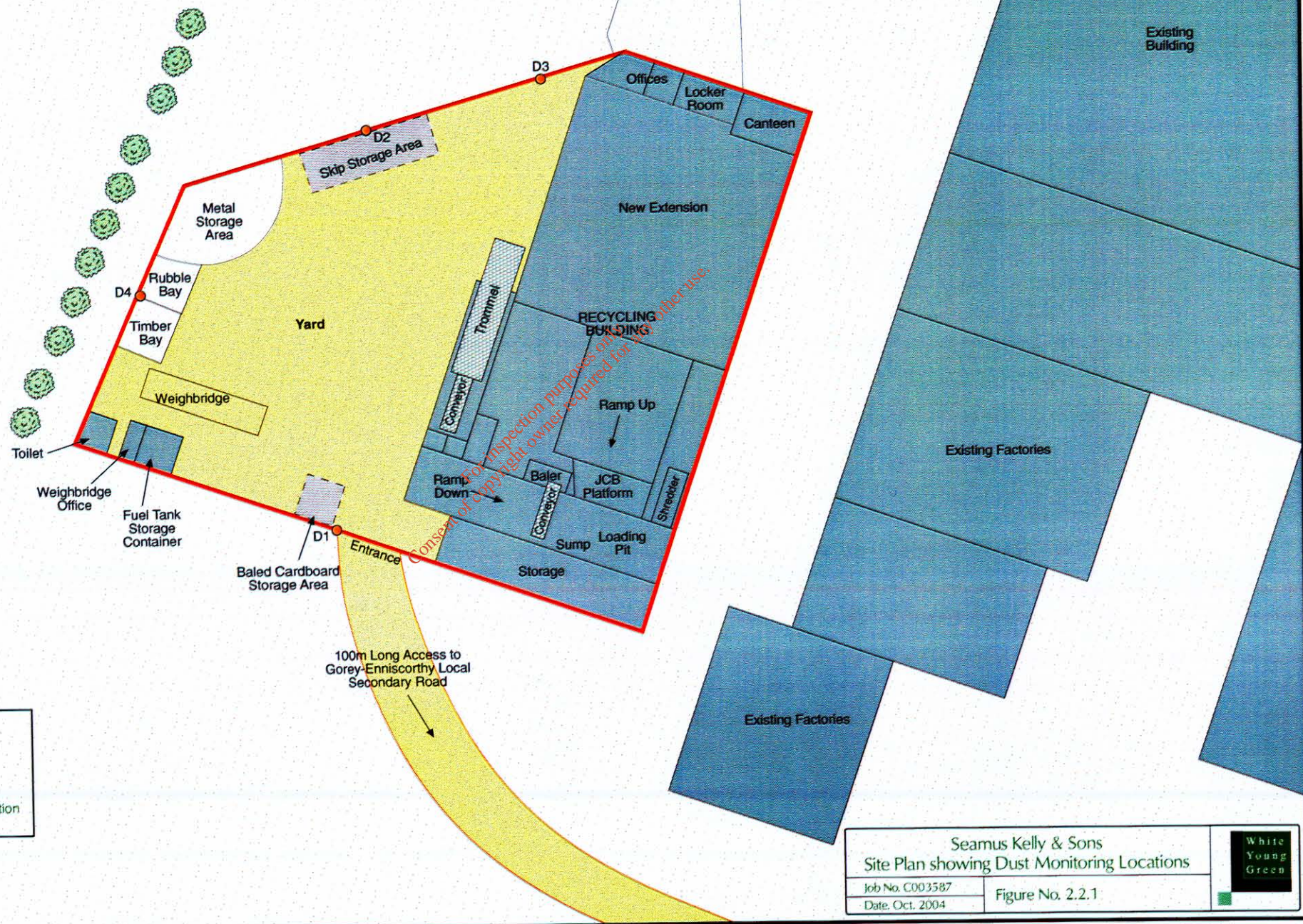
Seamus Kelly & Sons  
Proposed Site Drainage

Job No. C003587	Figure No. 2.6.1 (Rev. A)
Date. Feb. 2005	





NOTE: Drawing is schematic. No measurements to be taken.



**LEGEND**

- Site Boundary
- Buildings
- Coniferous Trees
- D1 ● Dust Monitoring Location

Seamus Kelly & Sons  
Site Plan showing Dust Monitoring Locations

Job No. C003587	Figure No. 2.2.1
Date: Oct. 2004	