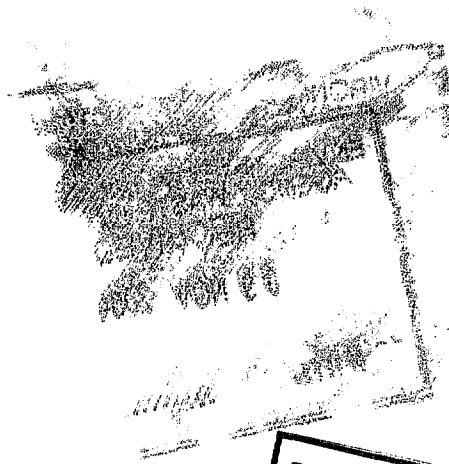
White Young Green



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

5th November 2004

ENVIRONMENTAL PROTECTION AGENCY WASTE LICENSING RECEIVED
09 NOV 2004
INITIALS.....

RE: Register Number 202-1
Ref: 202-1/Art16(1)01BM

Dear Sir/Madam,

Please find enclosed the original plus 15 copies of information requested for Article 13 Compliance for the above facility.

Yours sincerely,

Eleanor Flood

Eleanor Flood MSc BSc
Environmental Scientist
White Young Green

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White Young Green Ireland Ltd
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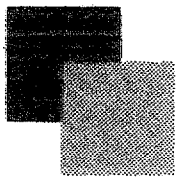
A list of directors may be inspected at the above address.
Belfast - Cork - Derry - Dublin - Limerick - Offices throughout the UK and overseas

thinking beyond construction



SEAMUS KELLY & SONS,
WASTE RECYCLING CENTRE,
GOREY BUSINESS PARK,
GOREY,
CO. WEXFORD.

ARTICLE 13 COMPLIANCE INFORMATION

REG. NO. 202-1

OCTOBER 2004

Reference: Seamus Kelly & Sons				
Issue		Prepared by		Verified by
V1	Oct. 04			
V2	-			
V3	-			
V4	-	Debbie Good BSc HND		Donal Marron
V5	-	Senior Environmental Scientist		Project Director
File Reference: C003587/Reports				

White Young Green Ireland Limited, Unit 14 Penrose Wharf, Penrose Quay, Cork
Telephone: 00353214861488 Facsimile: 00353214861489 E-Mail: cork@wyg.com

SEAMUS KELLY & SONS,
WASTE RECYCLING CENTRE,
GOREY BUSINESS PARK,
GOREY,
CO. WEXFORD.

ARTICLE 13 COMPLIANCE INFORMATION

REG. NO. 202-1

CONTENTS

ARTICLE 13

1. *Provide a description detailing the inter-relationship between human beings, flora, fauna, soil, water, air, climate, landscape, material assets, in relation to data required to identify and assess the main effects, which the proposed development is likely to have on the environment.*

The interactions identified as part of the Environmental Impact Statement for the proposed development are detailed below. It should be noted that in certain cases there are obvious interactions between environmental media, e.g. climate and flora, however, if the proposed waste recycling facility does not have the potential to impact or affect the interaction, then that interaction is not highlighted

Human Beings / Water

Contamination of surface water at the site has the potential to impact on the water quality in the Banoge River. This impact could potentially affect the amenity value of the river which would affect human beings. Contamination of groundwater beneath the site would restrict any future use of the underlying strata for water supplies and would also have the potential to impact on the water quality in the Banoge River. Mitigation measures to ameliorate these potential impacts are proposed in Sections 4.5 and 4.6 of the EIS, after which the effects are expected to be insignificant.

Human Beings / Air

Dust emissions, noise emissions and odours from the facility have the potential to impact on human beings in the vicinity of the site. Impacts from dust and odours are considered low and mitigation measures are not considered necessary due to the reasons given in Sections 4.2 of the EIS. Measures are proposed in Section 4.3 of the EIS to mitigate against future noise emissions.

Water / Flora and Fauna

Contamination of surface water or shallow groundwater at the site has the potential to impact on the water quality in the streams and river downgradient of the site. This impact could potentially affect the aquatic life in these water courses. Mitigation measures to ameliorate this potential impact are proposed in Section 4.6 and Section 4.7 of the EIS, after which the effects are expected to be insignificant.

Water / Soil

Soil beneath the site can act as a pathway for contaminants reaching both the groundwater and the surface water. Contamination of the soil can therefore lead to contamination of the water environment. Mitigation measures to ameliorate this potential impact are proposed in Section 4.4 of the EIS, after which the effects are expected to be insignificant.

Human Beings / The Landscape

The visual impact of the facility has the potential to affect human beings. Mitigation measures are proposed in Section 4.10 of the EIS.

2. *Under Section 4.13 of the EIS, reference is made to Table 4.13.1, however this table is not produced. Provide table 4.13.1 highlighting impacts and effects on interactions between environmental media and identifying the sections of the EIS where the interactions are addressed.*

Table 4.13.1: Impacts and Effects on Interactions between Environmental Media

	Human Beings	Flora	Fauna	Soil	Water	Air	Climate	The Landscape
Human Beings								
Flora	none							
Fauna	none	none						
Soil	none	none	none					
Water	Sections 4.5 & 4.6	Sections 4.6 & 4.7	Sections 4.6 & 4.7	Section 4.4				
Air	Sections 4.2 & 4.3	none	none	none	none			
Climate	none	none	none	none	none	none		
The Landscape	Section 4.10	none	none	none	none	none	none	

Note: This table identifies the section of the EIA where impacts or effects on interactions between environmental media are discussed. Any interactions which will not be impacted upon or affected by the facility are not described in the EIS.

2. *Provide details on the estimated type and quantity of expected residues and emissions resulting from operation of proposed development affecting vibration.*

There will be no vibration impacts resulting from the operation of the proposed waste recycling facility. The construction phase will be carried out in accordance with *BS5228 Noise and Vibration Control on Construction and Open Site*, in order to mitigate against any potential vibration impacts associated with construction.

4. *Section 2.1.1 of the EIS states "The annual average rainfall data for the Rosslare station is presented in Table 2.1.1". Table 2.1.1 provides details of wind direction at Rosslare as opposed to average rainfall data. Provide Table 2.1.1 containing data for annual rainfall at Rosslare station.*

The annual average rainfall data for the Rosslare station is presented in Table 2.1.1 below.

Table 2.1.1 Annual Average Rainfall Rainfall Data for the Rosslare Station

Rainfall Station	Period Covered	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Average
Rosslare	1961 to 1990	94.8	69.9	67.8	55.7	55.8	50.6	50.7	68.7	73.3	94.9	97.1	97.8	877.1
Wind Direction at Rosslare														
Wind Direction (from)		N	NE	E	SE	S	SW	W	NW					
Frequency (%)		8.6	10.1	7.1	6.4	15.9	25.4	16.0	10.5					

5. *Section 2.2.4 of the EIS states "The odours emitted from non-hazardous solid waste are considered a nuisance to the public rather than an environmental hazard and controls of this potential nuisance are presented in Section 3.4.6". Provide details of the controls that will be put in place to keep odours from putrescible waste to a minimum.*

It is proposed that the recycling building will contain all of the plant and machinery and the southern portion of the building will contain a storage area. All commercial and domestic wastes will be handled within the recycling building and all vehicles carrying these wastes will be fully covered in order to limit the odours to within the building. Wastes on the site are generally processed within 12 hours and within a maximum of 48 hours, which limits the intensity of any potential odours generated form the putrescible fraction of the waste.

In order to further control any odours from putrescible waste it is proposed to install a deodorising system in conjunction with the proposed dust suppression spray system within the recycling building. This system will disperse a perfumed aerosol spray throughout the building and will be used to control odours if they should arise.

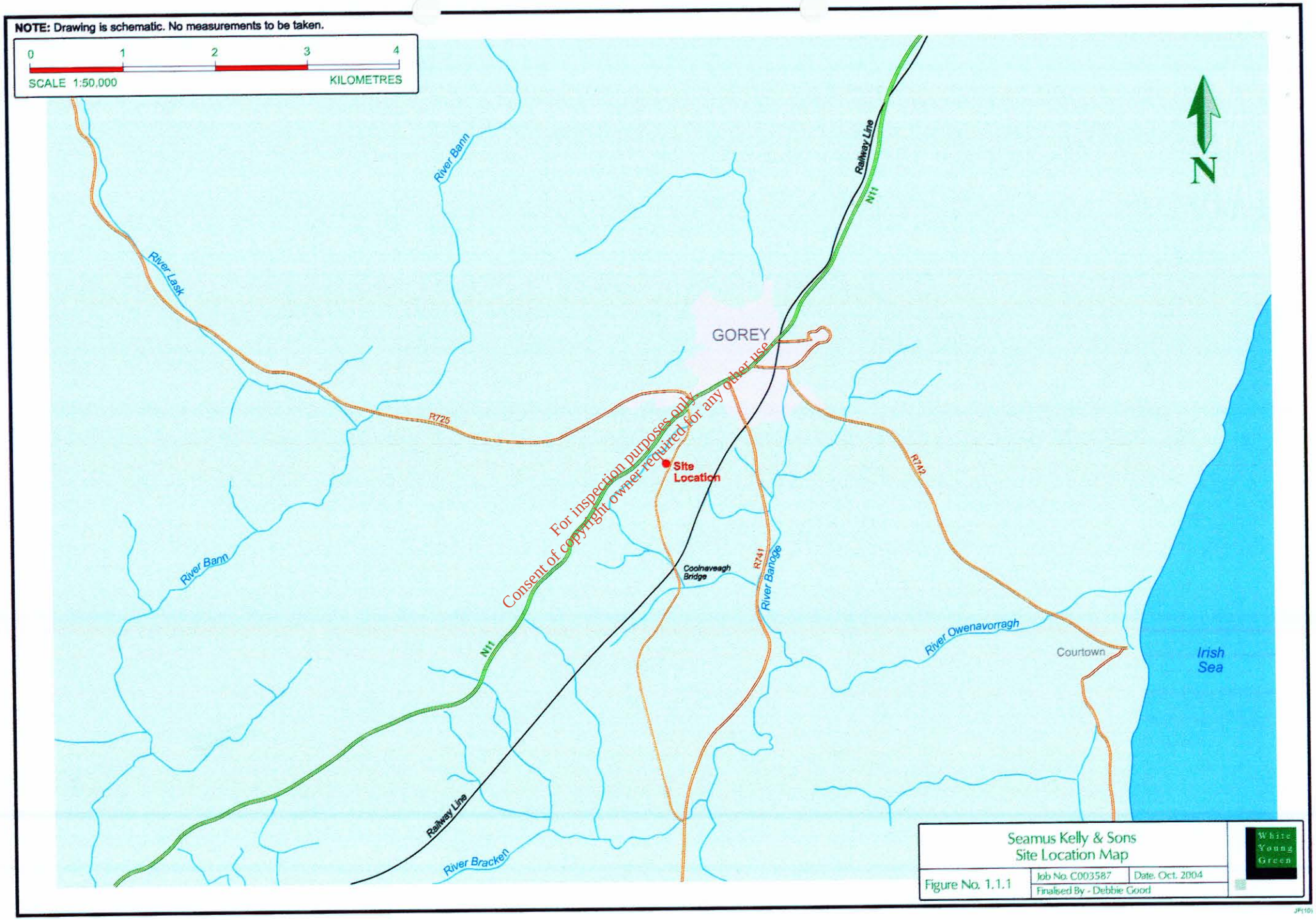
6. *Reproduce Figure No. 1.1.1 "Site Location Map" showing the location of Coolnaveagh Bridge in relation to the location of the Waste Transfer Station.*

Refer to Figure No. 1.1.1.

7. *Provide an updated EIS non-technical summary of all information supplied, including that supplied in response to this notice.*

Refer to Attachment A for a copy of the updated EIS Non-technical summary.

Figures



ATTACHMENT A
EIS, NON-TECHNICAL SUMMARY

EIS, Non Technical Summary

1. General

This non-technical summary is provided as required by Article 6 of the European Communities (Environmental Impact Assessment) Regulations, 1998 (S.I. No. 351/1998) which amends Article 25 of the European Communities (Environmental Impact Assessment) Regulations, 1989 (S.I. No. 349/1989).

Seamus Kelly and Sons (SK&S) operate a domestic, commercial and industrial waste collection and recycling business from Gorey Business Park, Ramstown Gorey, Co. Wexford. The facility has planning permission to operate a waste transfer station since 1995. Significant changes are now necessary to allow the company to expand its recycling processes and to improve the environmental performance and the overall efficiency of operations at the site. This environmental impact statement (EIS) will be sent to the EPA to accompany the waste licence application which was submitted in February 2004.

2. Description and characteristics of the development

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 landfill 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, fould water storage tanks, percolation area, vehicle wash bay, recycled materials storage bays and a fuel storage area.

The facility currently 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. The Waste Licence Application accompanied by this EIS 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 and the provision of a proprietary wastewater treatment plant.

3. Data necessary to identify and assess the main effects which the development is likely to have on the environment

The data necessary relates to the site development characteristics and the existing environment in which the development has been situated as follows:

Site Statistics and Development Characteristics

Although strictly speaking, site statistics are not an aspect of the environment, per se, they form the database upon which most of the calculations related to impacts on the environment are based. The site statistics include site area, building size, hours of operation and traffic generation.

Climate

Climatological data for a number of stations in County Wexford relating to rainfall, wind and evapotranspiration was compiled as a baseline for evaluating the development. The annual rainfall at the site was estimated at 877mm/annum and the prevailing wind was determined to be from the west and southwest.

Air Quality

Dust measurements were made at three monitoring stations. Elevated dust levels were recorded at the site with higher levels recorded upwind of the site on the west and northwest boundaries. Historically the handling of C&D waste had been an additional source of dust on site but the proposed enclosure of C&D waste handling inside the proposed new building and the provision of a dust suppression spray system inside the building will minimise the risk of future dust emissions from this activity.

Noise Environment

Baseline noise levels were recorded at four boundary locations on site and at ten of the nearest sensitive receptors. Noise assessment was carried out during daytime operations at the site. Background noise levels in the surrounding area are influenced by a combination of site activities, passing road traffic and neighbouring activities.

Geology and Soils

The site is underlain by the Campile Formation, which forms the top of the Duncannon Group, Lower Palaeozoics. The overlying soils consists of glacial drift of sandy, gravelly clays. Previous investigations within the Ramstown area recorded deposits of clayey material ranging in thickness from 9.5m to 20.5m.

Groundwater

The groundwater direction flow in the bedrock is most likely in an easterly direction towards the Banoge River. The site is underlain by rocks of the Campile Formation of the Duncannon Group which is considered to be a major aquifer.

A groundwater sample collected from the on-site well recorded groundwater with elevated levels of manganese, sodium, chloride, conductivity and to a lesser extent sulphate. There was little evidence of organic contamination as indicated by the low levels of ammonia, nitrite, nitrate, phosphate, TON and a relatively high concentration of dissolved oxygen.

Surface Water

The site is located in an industrial area therefore surface water from roofs and paved areas of the site currently runs-off to constructed storm drains. All non-roof surface water passes through 2 (No.) petrol interceptors prior to discharge to a percolation area. It proposed to roof in the entire site therefore all surface water run-off will be in the form of clean roof water.

Flora and Fauna

The site is not covered by any designations of nature conservation interest. There are no natural or semi-natural habitats on site.

Human Beings/Local Population

The site is located in an industrial area, which is zoned *"To provide for Industrial Uses"* in the Gorey Local Area Plan 2002. Therefore the predominant land use in the vicinity of the site is industrial. An urban residential area is located 200m to the northeast.

Traffic and Road Network

A traffic survey carried out at the site indicated that the existing junction, site entrance, and circulation areas work well with the existing traffic volume. The site is convenient to the N11, thus providing good access to the National Roads network.

Landscape

The existing recycling centre is located within an extensive area of industrial development and therefore has low impact on the landscape environment. The site boundary comprises concrete block walls fitted with corrugated sheeting.

Cultural Heritage

An appraisal of the cultural heritage was undertaken, detailing relevant aspects of local history and providing an archaeological assessment of the site and its environs. The study concluded that historical industrial development had removed or disturbed any areas on the site where archaeological remains could have survived. Nothing of archaeological significance was noted in the field assessment.

Material Assets

The material assets of the local area comprise other industrial premises, housing some distance away together with public infrastructure including roads, a railway and overhead electric wires. The N11 is dominated by heavy commercial traffic. There are no tourist sites of note in the vicinity of the development.

4. Likely significant environmental effects and measures envisaged to avoid, reduce or remedy them

Climate

No significant adverse impact upon the climate is predicted as a result of the operation of the facility.

Air Quality

No adverse effects on air quality from aerosols or decomposition gases are predicted. Further dust control measures will be put in place at the at the facility including the construction of a new building to entirely cover the facility and the installation of a dust suppression spray system. This will further reduce potential dust emissions from the site.

Noise

The proposed expansion of the Recycling Centre is likely to increase the number of waste haulage vehicles and associated noise. Additional noise from daytime traffic will be insignificant in terms of existing heavy industrial traffic on the N11. All on-site operations will be totally enclosed by the new building which will reduce noise emissions. Other mitigation measures will include using modern plant and equipment, maintaining/servicing plant and equipment and switching off or throttling back plant when not in use.

Geology and Soils

The concrete floors and drainage systems in the existing and new buildings and yards at the site will prevent any contaminants from the waste materials migrating into the underlying clay and no impact on soil quality is predicted. This boulder clay provides a very good barrier between the development and the bedrock and no impacts from the development are predicted.

Groundwater

The vulnerability of the bedrock aquifer is moderate. All rainwater falling on the upgraded site will be in the form of clean roof water. Foul water generated within the site from toilets/canteen etc. will be treated on site in a wastewater treatment system and discharged to the percolation area. Any leachate generated within the processing building (from floor wash down etc.) will be directed to the storage tanks and tinkered off site to the Enniscorthy wastewater treatment plant as and when required.. The risk of groundwater pollution will be reduced by the proposed development and therefore the net impact of the development is considered to be positive in groundwater terms.

Surface Water

The proposed roofing of the entire site, by the construction of the new building, is considered as a positive impact in terms of surface water quality. All rain falling on the site will run off the roofs to the storm water system and will consist of clean rainfall. No additional mitigation measures are considered necessary.

Flora and Fauna

Pest Control measures are in place on site for the control of vermin. The proposed roofing of the entire site will mitigate for any potential impacts on water quality in the Banoge River and its tributaries. With these mitigation measures in place no negative impact is anticipated on flora or fauna in the vicinity of the development.

Human Beings/Local Population

The proposed expansion is not expected to have a negative impact on the residents living adjacent to the site. The construction of the additional building will have a positive effect on dust, noise and odour control in the surrounding area. The expansion of the facility will lead to an increase in employment locally. With appropriate emissions-related mitigation measures in place no adverse significant impact is anticipated to human beings.

Traffic and Road Network

The proposed increase in traffic associated with the expansion of the SK&S facility will be easily absorbed by the existing capacity of the N11 and the adjacent national network. No adverse impact on the surrounding road network or road users is predicted from the proposed expansion of the SK&S recycling centre.

Landscape

The proposed development is visually in keeping with the surrounding industrial land use. The development has no conflict with the County Wexford Development Plan or the Gorey Local Area Plan. No negative visual or landscape impact is anticipated.

Cultural Heritage

The nature of pre-existing industrial development has rendered the survival of archaeological remains highly unlikely. There is no discernible impact on the archaeological or historical resource and no mitigation measures are recommended.

Material Assets

No negative impact is predicted on the material assets of the Ramstown or Gorey areas.

Interactions

A number of potential impacts resulting from interactions between environmental media were identified. Mitigation measures for these potential impacts are proposed in specific Sections of the EIS (e.g. surface water, air, noise etc.). Impacts from interactions of environmental media at the site are considered low or insignificant.

5. Effects of the Development due to use of Natural Resources

No natural resources, other than groundwater, are used directly to operate the facility. Fossil fuels are used to power vehicles and plant. Electricity is used which is derived from the burning of fossil fuels by the ESB. The overall effect of the development on natural resources is considered insignificant. Since wastes handled by the facility are produced regardless of the development some other similar operation would still be required.

6. Effects due to Emissions

The effects of emissions from the facility are addressed in Section 3 of the EIS. This includes the short, medium and long term effects, and the permanent, temporary, positive and negative effects of any environmental emissions.

7. Forecasting Methods Used to assess any Effects on the Environment

Professional judgement based on site reconnaissance, desk studies and calculations were used to assess effects of the proposed development on the environment.

8. Alternatives

The alternatives available to the operator are addressed in Section 1 of the EIS. These include alternative locations, alternative processes and the do-nothing alternative. In practical terms the expansion of an existing facility is favourable to the installation of a new facility. The location of the existing centre in an industrial estate with good access to the national road network is considered a very favourable location for a waste management centre. SK&S are attempting to improve the recycling infrastructure at the site to maximise the volumes of material recycled and minimise landfilling, as required by National and EU Policy. The do-nothing alternative is considered less favourable than the present situation.

9. Difficulties encountered in compiling specified information

No difficulties were encountered.