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Dr. Thomas McLoughlin, Inspector, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford.

RE: Reply to Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations for Application 221-1

Dear Dr. McLoughlin

On behalf of our client, Dublin City Council, and with reference to you letter dated the 3rd of October 2005, in relation to Article 14(2)(b)(ii) request for information pertaining to the Waste Licence Application by Dublin City Council to develop a Civic Amenity Site at a site in Labre Park, Ballyfermot, Dublin (221-1), please find below the information as requested.

You indicate in your application that materials have been infilled at the proposed Civic Amenity facility at Labra park and I note that you have furnished a site specific risk assessment for the infilled material. Please give an estimate of the amount of material that has been infilled at the proposed site.

The lands within the Labre Park site, and in the wider naturally low lying Ballyfermot area, have been historically infilled to raise topographic levels and thus improve underfoot ground conditions.

A detailed site investigation programme was undertaken within the Labre Park site in March/April 2005. As part of the site investigation programme 30 No. trial pits were excavated cross the site to determine the nature and extent (both lateral and vertical) of the materials infilled above natural ground. The findings of the site investigation programme indicate that the thickness of fill material varies from 2.5m to 3m across the site.

The material infilled within the site predominantly comprises Clay dominant fill, with construction and demolition debris embedded. Below the clay dominant fill, old municipal waste fill was encountered.

Based on the area of the site, which comprises approximately 38,000m², the volume of fill material existing within the site is estimated within the range of 95,000m³ (2.5m thick fill) to 114,000m³ (3m thick fill).



The Agency wish to inform you that this infilled material that is deposited at the site is a development under Waste management legislation. Consequently such a development must be applied for in your application under Class 4 of the Fourth Schedule of the Waste Management Act 1996 to 2003.

The following is an amendment to the last paragraph of Attachment B7- Type of Waste, Tonnage and Fee:

Fourth Schedule, Class 4- "Recycling or reclamation of other inorganic materials." Designated containers will be provided for the collection of inorganic materials, such as construction and demolition waste derived from household renovations, conversions, etc.

A detailed site investigation programme was undertaken within the Labre Park site in March/April 2005. As part of the site investigation programme 30 No. trial pits were excavated cross the site to determine the nature and extent (both lateral and vertical) of the materials infilled above natural ground. The findings of the site investigation programme indicate that the thickness of the inert fill material varies from 2.5m to 3m across the site, giving a volume of between 95,000m³ (2.5m thick fill) to 114,000m³ (3m thick fill). This material will be left in-situ and will remain undisturbed where possible.

Please find the revised Attachment B7 in Appendix 2 of the revised Attachment B7 in Appendix 2 of the revised Attachment B7 in Appendix 2

Please provide a map showing the location of the nearest receptor(s) to the proposed facility.

Please refer to Drawing No. 1200 1/301 in Appendix 3, which shows the location of the nearest receptors

of the nearest receptors.

It is stated in the application that the proposed site is owned in the majority by Dublin City Council, while a portion of the south west corner is in private ownership. Please provide clarification if and when DCC propose to purchase this portion of the site.

The purchase of the lands in the southwest corner of the proposed Civic Amenity Site are part of a land swap agreement between Dublin City Council and Thorntons Waste Disposal Ltd. Dublin city Council gave formal agreement to the proposed land swap on the 4th of July 2005. Agreement has been reached between the two parties on the details of the transaction and those details are currently being finalised by the Law Department of Dublin City Council. Please refer to Drawing No. 1260/01/301, which shows the area of land being acquired from Thorntons Waste Disposal Ltd.

Please find attached a response to request for further information on Environmental Impact Statement (EIS) for proposed Civic Amenity Facility at Labre Park, Ballyfermot, Dublin 10, as submitted to An Bord Pleanála in April 2005, for your further information.



Please also find attached a disc containing photographs of a clean-up operation that was carried out at Labre Park in August 2005 by Dublin City Council. The Council removed a total of 2,810tonnes of waste material, at a cost of €574,231.

Should you have any questions or require any further clarification with respect to the above please do not hesitate to contact either Tom Loftus at Dublin City Council or myself.

Yours sincerely,

Dermot Burke B.E., M.Eng.Sc., M.I.E.I.

TES Consulting Engineers

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APPENDIX 1- RESPONSE TO FURTHER INFORMATION ON ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR PROPOSED CIVIC AMENITY FACILITY AT LABRE PARK, BALLYFERMOT, DUBLIN 10, AS SUBMITTED TO AN BORD PLEANÁLA IN APRIL 2005

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Responses to request for further information on Environmental Impact Statement (EIS) for proposed Civic Amenity Facility at Labre Park, Ballyfermot, Dublin 10

April 2005

Dublin City Council
Engineering Dept.,
Floor 4,
Block 1,
Civic Offices,
Fishamble Street,
Dublin 8.

DC0127

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Introduction

The Waste Management Services section of Dublin City Council lodged an Environmental Impact Statement (EIS) for a proposed Civic Amenity (CA) Facility at Labre Park, Ballyfermot, Dublin 10. The application was submitted in accordance with the European Communities (Environmental Impact Assessment) Regulations 1989 to 2001 and the Planning and Development Act 2000.

A request for further information was made by An Bord Pleanala as follows:

- 1. Drawings indicating the following:
 - (a) Indicative boundary wall construction, including details of height, use(if any) of railings, proposed surface treatment.
 - (b) Hydrocarbon interceptors, referred to in text, but not included in Drainage Drawings.
 - (c) Surface water attenuation tanks, referred to in text but not in Drainage Drawings.
 - (d) Drainage details of surface water outfall.
 - (e) Details of entrance with respect to proposed bridge indicated on drawing as being below the entrance.
 - (f) Details of access road with reference to connection (if any) to Labre Park.

 Details of impact on building at the west end of Labre Park.
- 2. In relation to Section 12 of the EIS (Soils and Geology), submit a report on the evaluation of the trial pits, with particular reference to the evaluation of domestic wastes found in the trial pits. Report should contain any recommendations for action/ treatment of such waste.

A response to each of the items above is provided below and in the attached drawings.



1. Drawing Updates

(a) Boundary Wall Construction

Drawing 24014-013 (Appendix 1) details the boundary wall/fence proposed along the southern boundary of the facility, adjacent to the canal bank. The design attempts to provide a boundary which is aesthetically pleasing while also secure but minimises screening of the area outside the boundary, where there is potential for anti-social behaviour to occur.

Drawing 24014-015(Appendix 2) details the boundary fence proposed along the remaining site boundaries. This design has no wall at the base of the fencing to allow for the free flow of water through the site in the event of severe flooding. On the northern boundary of the site access will be provided to the bank of the Galback Stream via gates at the locations indicated on Drawings 24014-003B.

(b) Hydrocarbon Interceptors

Drawing 24014-003B (Appendix 3) has been amended to include the hydrocarbon interceptor referred to in the text of the EIS.

The interceptor used will be manufactured from a robust material such as glass reinforced polystyrene and will be rot-proof. The capacity of the interceptor is 6,600 litres and is suitable for this development, as the site has been classed as low risk - there will be no fuel delivery tanks or fuel storage tanks on the site. The site will be a low risk area where there is a risk of frequent oil contamination of surface water runoff, but in low concentrations and small quantities.

The interceptor will have the capacity to handle low-level surface water contamination from the site it will be encased in a concrete surround, vented to the atmosphere and will have manholes for easy access for maintenance and servicing.

The size of the interceptor is based on Manufacturers Guidelines for the nature and size of the area to be drained. For a site of 11,111 m² or under, the following specifications apply.

Area Drained	11,111 m ²
Net Capacity	6600 litres
Length	3929 mm
Diameter	1500 mm
Overall Height	2750 mm
Maximum Pipe	450 mm

As the site is 11052 m^2 in area, this size of interceptor is suitable for the site.

(c) Surface water attenuation tanks

Drawing 24014-003B (Appendix 3) has been amended to include a storm water attenuation tank referred to in the text of the EIS.



The surface water runoff from the site will be attenuated in an underground tank on the site. The tank will be sized to store 264 m³ runoff, which is the runoff volume calculated for the site from a 1 in 30 year event.

In the case of a 1 in 100 year storm event, flooding of the vehicle stopping lanes will occur in order to accommodate the additional runoff, and prevent flooding of adjacent sites. This is in accordance with SUDS Guidelines.

The surface water runoff from the site will be collected and stored in a sealed tank during heavy rainfall and then released through a flow control device which minimises the risk of flooding. The flow control device will control flow to a rate of 5 l/sec/hectare.

The attenuation tank will be manufatured from long-life polypropylene, fusion welded into a rigid, three dimensional hollow matrix. The actual dimensions of the tank will be 40 m (length) x 10 m (wide) x 0.88 m (depth). The capacity of the tank will be 352 m 3 , allowing storage of surface water runoff from a 1 in 30 year storm event, which is calcualted to be 328.2 m 3 . The calculations for the sizing of the storage are shown below.

Stormwater Runoff		Units
Allowable Runoff*	5	l/sec/hect
Site Area	<u>~</u> 1.1052	Hectare
Maximum Allowable Runoff Rate	5.526	l/sec
Maximum Allowable Runoff over 720 min.	238723.2	litres
and the state of t		
1 in 30 Year Event		
Storm Duration	720	mins.
Rainfall Amount**	51.3	mm
Total Runoff Volume	566.968	m^3
For Wills	566967.6	litres
Ecox.		
Attenuation reguired at Site (30 yr return		
period)	328244.4	litres

^{*} SUDS Figures ** Met Eireann Data

In the event of a 1 in 100 year storm event, an additional 139 $\rm m^3$ of runoff will have to be retained on site in order to maintain the maximum discharge rate of 5.526 l/sec from the site. This will be achieved by flooding of the stopping lanes. This area is 1285 $\rm m^2$. In order to retain 139 $\rm m^3$ of runoff, the stopping lanes will be flooded to a depth of 0.108 m (See Calculations below).

1 in 100 Year Event		Units
Storm Duration	720	mins.
Rainfall Amount	64.8	mm
Total Runoff Volume	716.2	m ³
Minus 1 in 30 Year Event Runoff	567.0	m ³
Additional Runoff from 1 in 100 Year Event	149.2	m3
Stopping Lanes Area	1285.0	m ²
Flood Depth of Stopping Lanes	0.116	m



(d) Drainage details of surface water outfall.

Drawing 24014-014 (Appendix 4) details the proposed headwall for the surface water outfall to the adjacent stream.

(e) Details of bridge at entrance

Drawing 24014-012 (Appendix 5) details the proposed bridge. It is proposed that the bridge will be constructed utilising inverted pre-stressed T- beams in a solid slab and incorporating a stone clad reinforced concrete parapet. The bridge selected allows for the full traffic loading and maintains the vertical and horizontal alignment of the access road. The resulting width under the bridge allows for future maintenance works to the stream without a constriction at the bridge.

(f) Details of access road

As per Section 5 of the EIS access to the site will be gained via Kylemore Park West. There will be no access from Labre Park to the facility.

At present there is a Community Centre located at the western end of Labre Park which is accessible on foot by the residents of Labre Park. It should be noted that there is a separate proposal by Dublin City Council, to construct new housing units and a new Community Centre on the south side of Labre Park. The pre Part VIII process for this development has commenced. A drawing of this development is attached (Appendix 6)

When this development is realised and the new Community Centre has been constructed the existing Community Centre will longer be used therefore access will no longer be required.

Prior to the completion of the new Community Centre and during construction of the Civic Amenity Facility, pedestrian access to the existing Community Centre will be maintained by the provision of footpaths and a pedestrian crossing from Labre Park. During the construction works the crossing will be directed.



2. Site Investigations

In Section 12 of the EIS and in a further detailed report (Findings of Site Investigation at Labre Park (Appendix 7)) it was recommended that a programme of soil sampling and analysis be undertaken at the site prior to development commencing. TES Consulting Engineers have been now been commissioned by Dublin City Council to carry out site investigations at Labre Park, Ballyfermot, Dublin 10

The site investigations, which have commenced, will take the form of the installation of a number of boreholes to monitor the quality of the groundwater and the undertaking of a network of trial pits across the site. The trial pitting exercise will establish the nature of the fill on-site and the nature of the subsoil environment

It is proposed to dig a network of approximately 30No. trial pits to maximum achievable depth (approximately 4m). In certain locations the trial pits will be retrofitted with slotted 50mm ducting, to act as short-term monitoring points. Soil samples will be retrieved during the investigation and these samples will be analysed, by ALcontrol Laboratories, for a wide range of chemical parameters to determine the extent, if any, of ground contamination.

Glover Site Investigations Ltd. have installed 3No. bereholes at the site. Groundwater samples will be obtained and analysed to determine if the infilled material has resulted in contamination of the groundwater environment.

The soil samples will be tested for a number of contaminants, namely:

- Gasoline Range Organics (GRO);
- Diesel Range Organics (DRO);
- Mineral Oils; and
- Heavy Metals (Arsenis, Cadmium, Chromium, Copper, Nickel, Zinc, Lead, Mercury, Selenium and Boron).

Up to 10No. of the soil samples will also be tested Volatile Organic Carbons (VOC), SVOC and Phenols. The 3No. groundwater samples from the boreholes will be analysed for all of the EPA Groundwater Compliance parameters, as well as for GRO, DRO, Mineral Oils, Heavy Metals, VOC and SVOC.

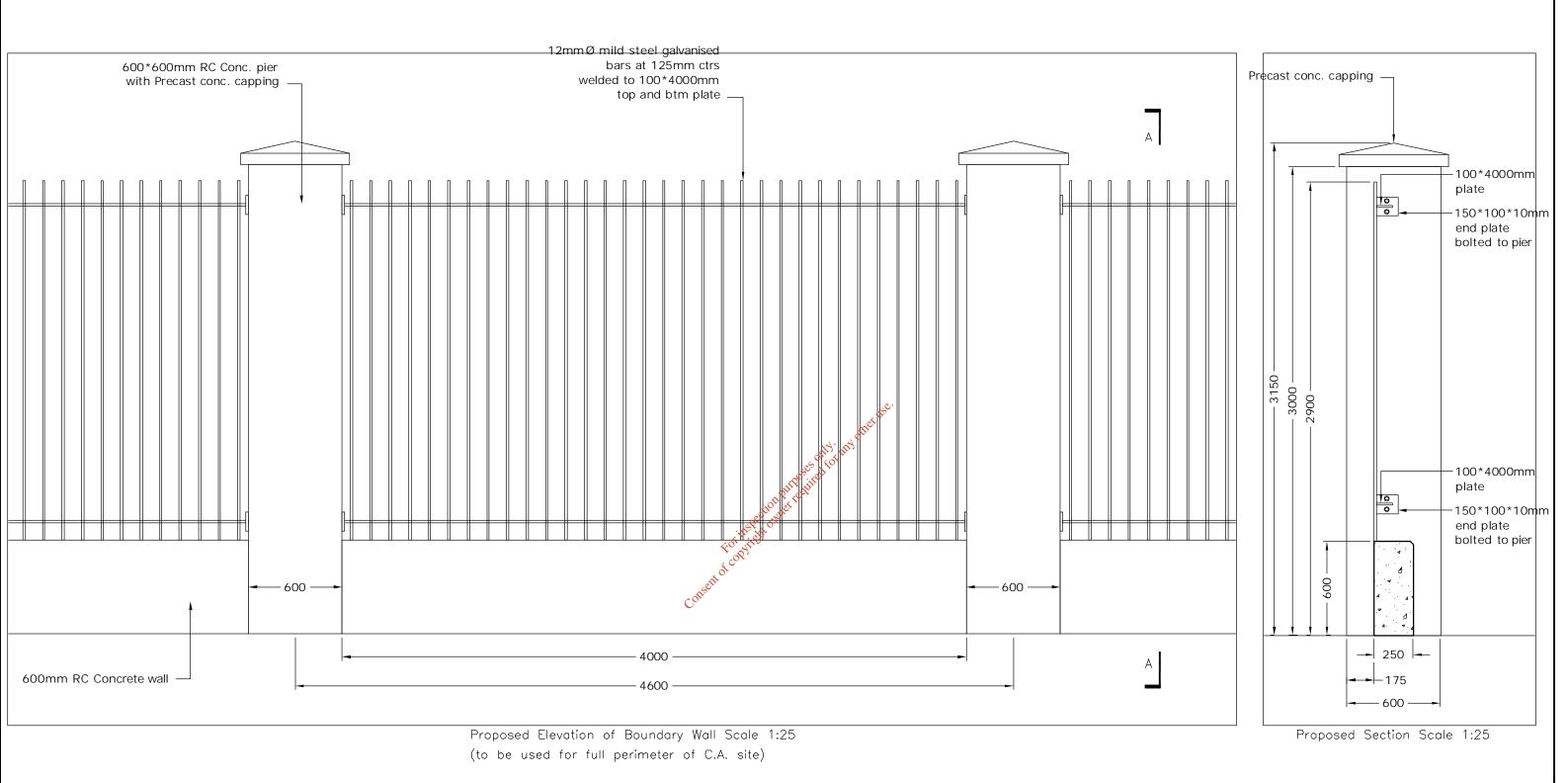
When the results of the laboratory testing are received, TES will issue a factual site investigation report that will include an evaluation of the extent of materials on the site and the degree, if any, of soil or groundwater contamination. The report will also make recommendations for possible removal of waste from the site and action/treatment of any contamination. This report is being prepared as part of the Waste License Application to the EPA for the proposed Civic Amenity Site at Labre Park, Dublin 10.



Appendix 1: Drawing 24014-013







 OFFICE
 Structural Office

 REVISIONS
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 DATE
 29-03-05

VCL Consultants

12 Ashdale, Wheaton Hall, Drogheda (041) 9839958

Client

Dublin City Council

DRAWING TITLE.

Proposed Boundary wall

Job Title

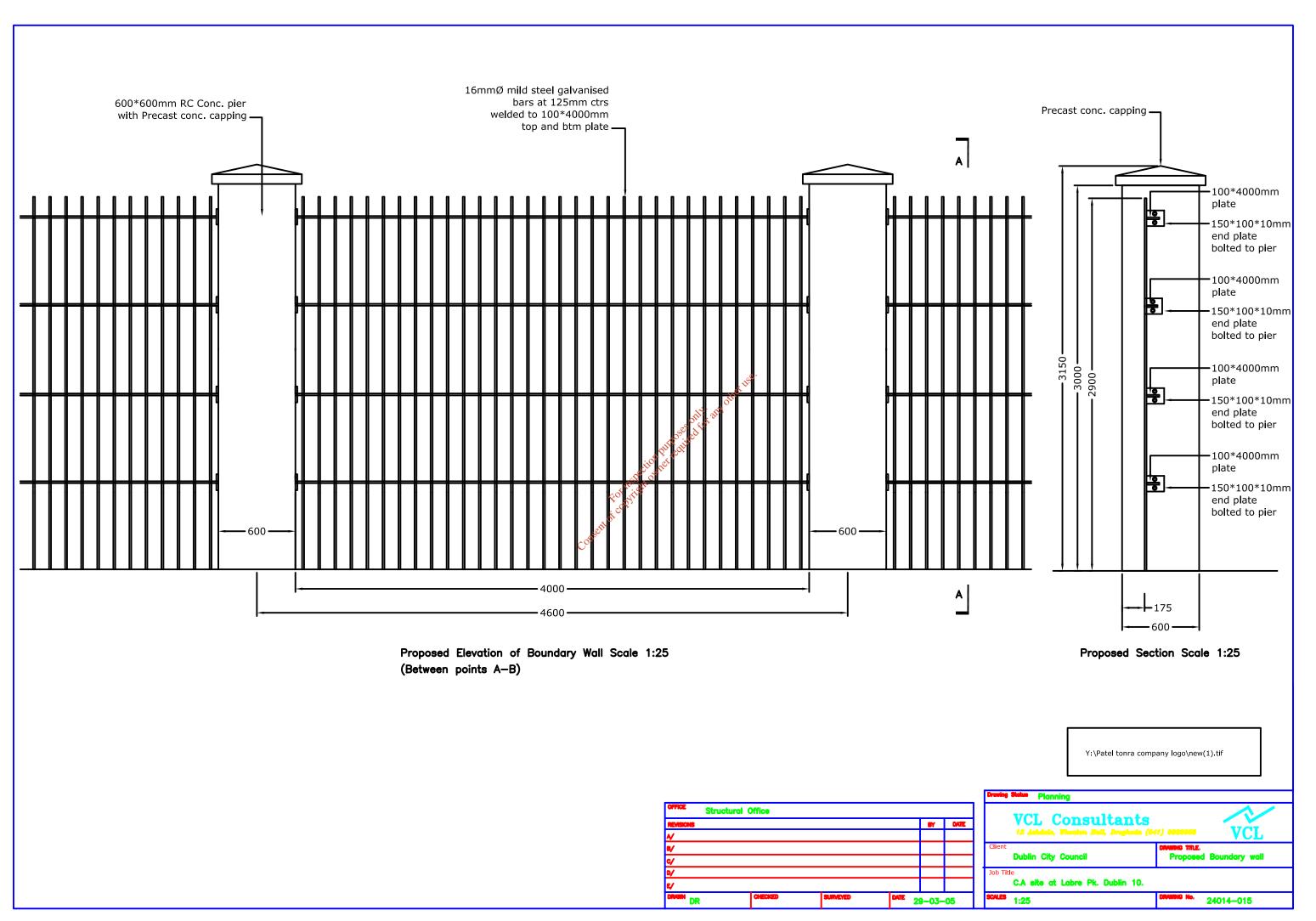
C.A site at Labre Pk, Dublin 10,

SCALES 1:25

Appendix 2: Drawing 24014-015



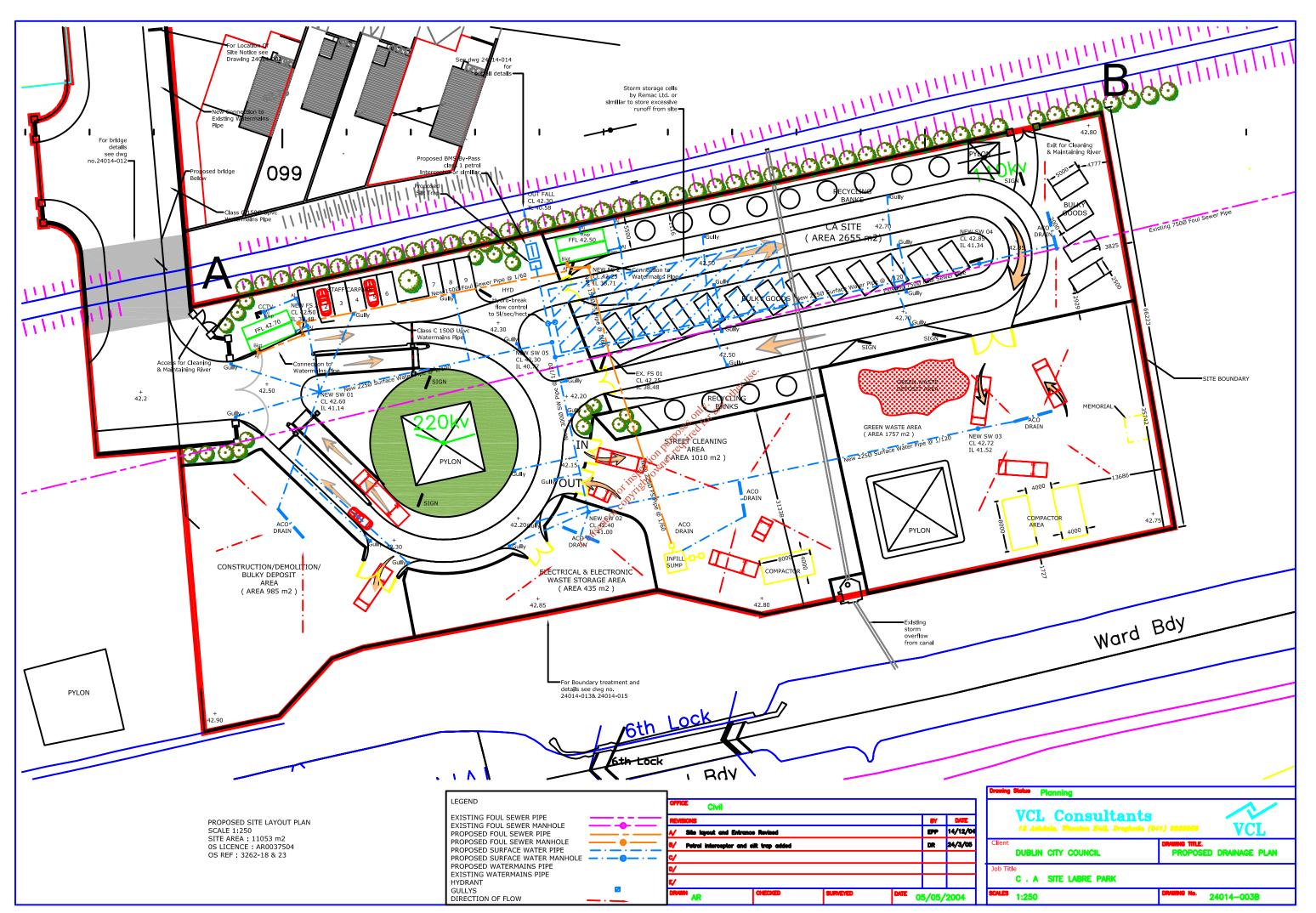




Appendix 3: Drawing 24014-003B



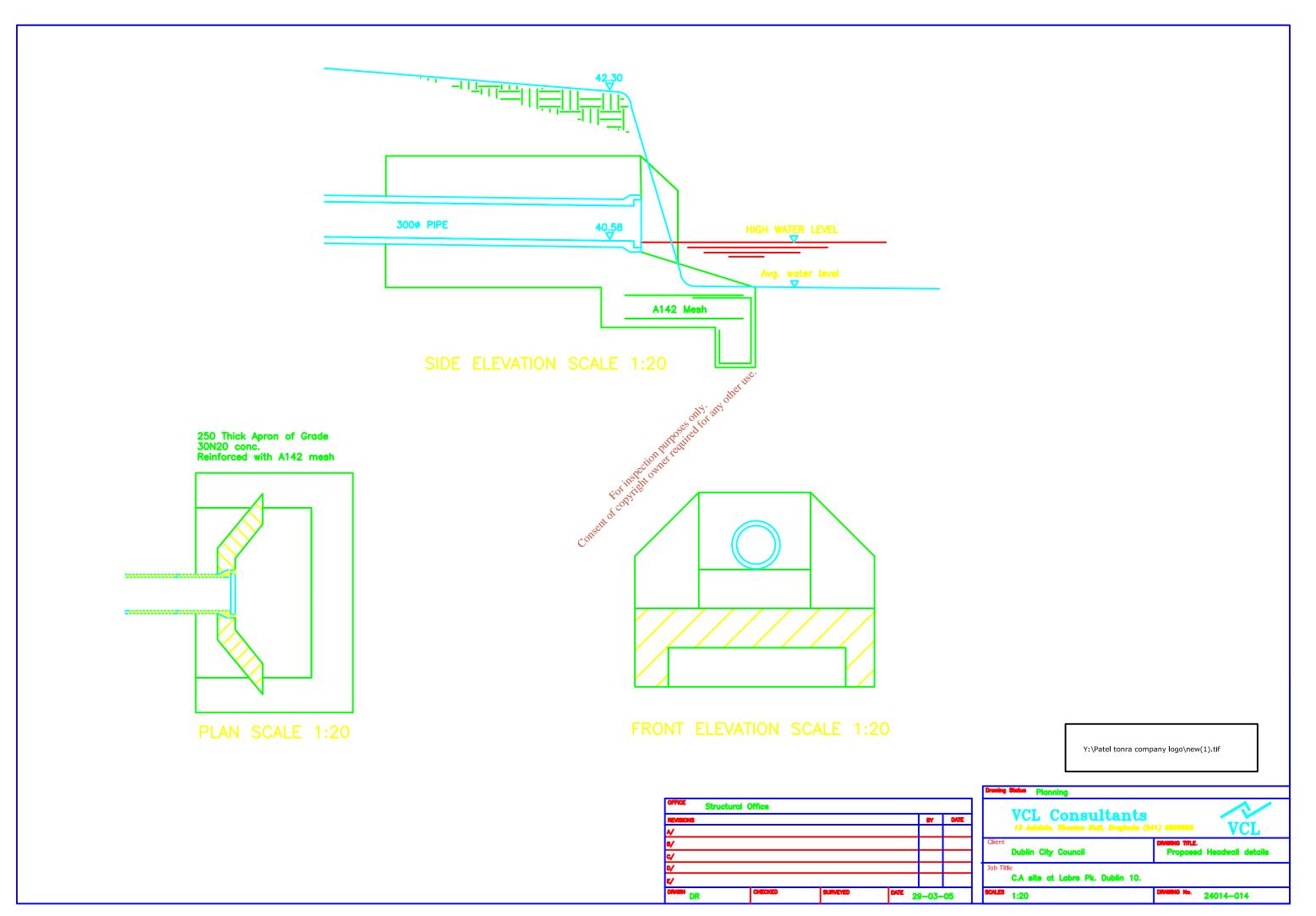




Appendix 4: Drawing 24014-014



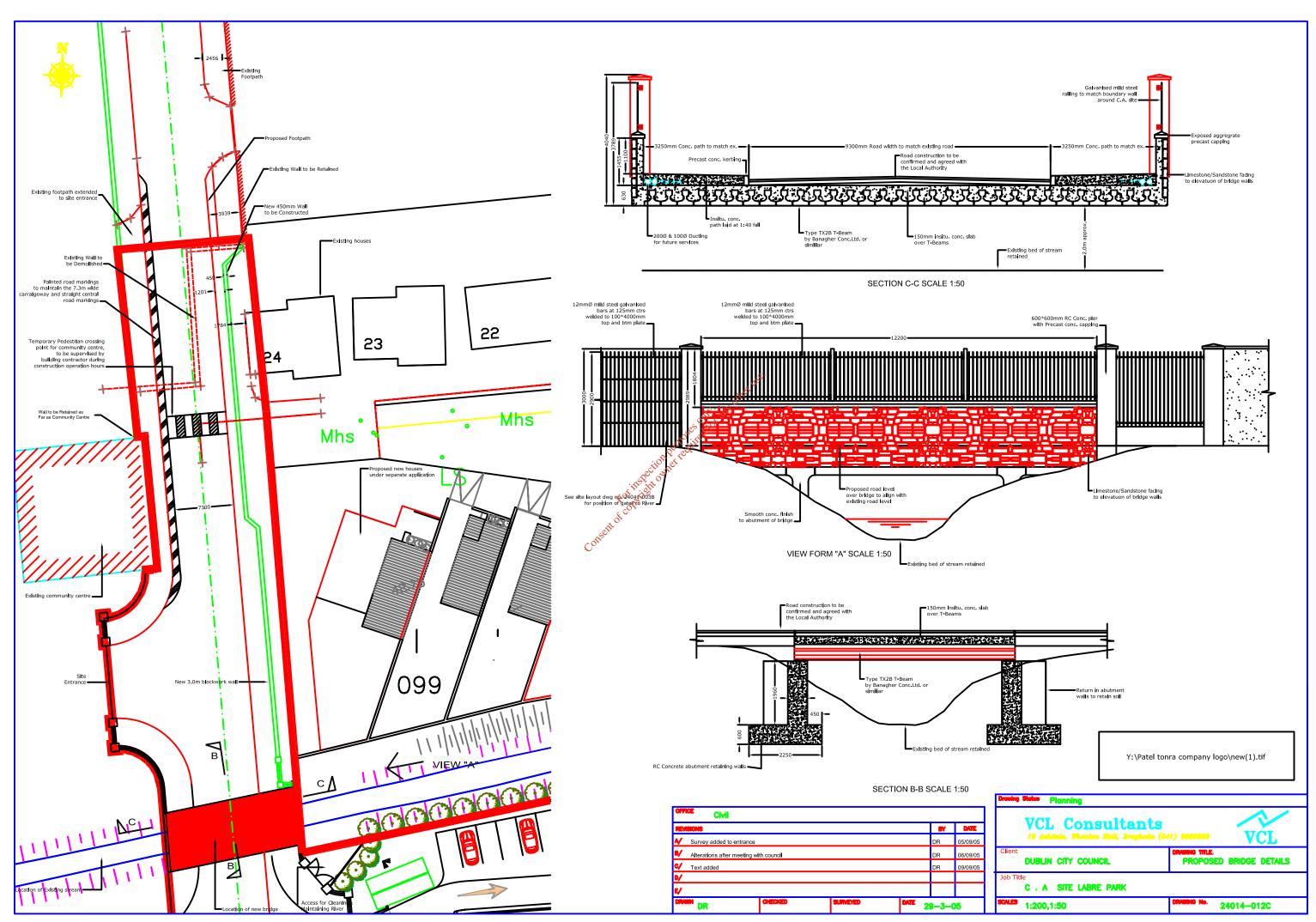




Appendix 5: Drawing 24014-012





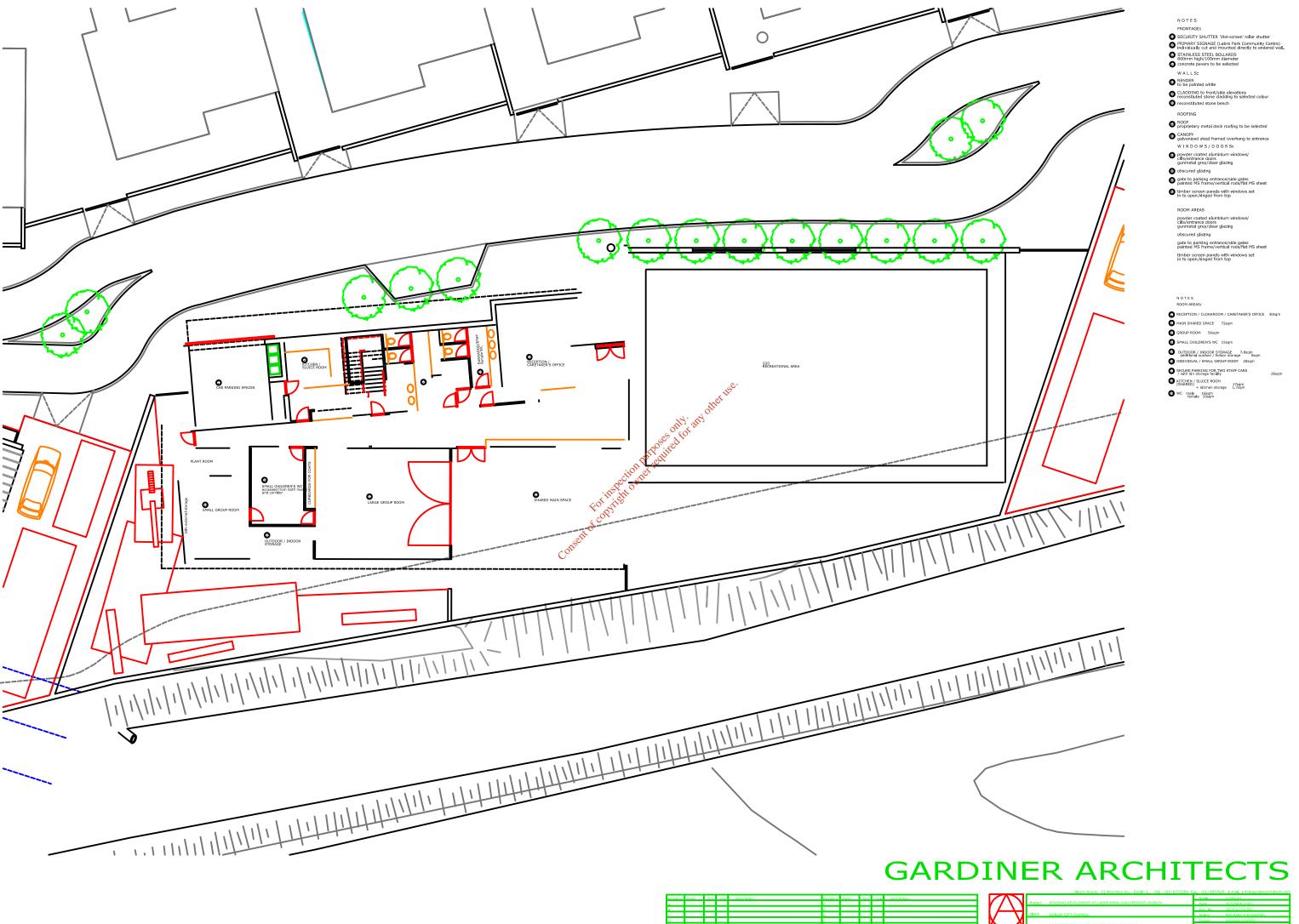


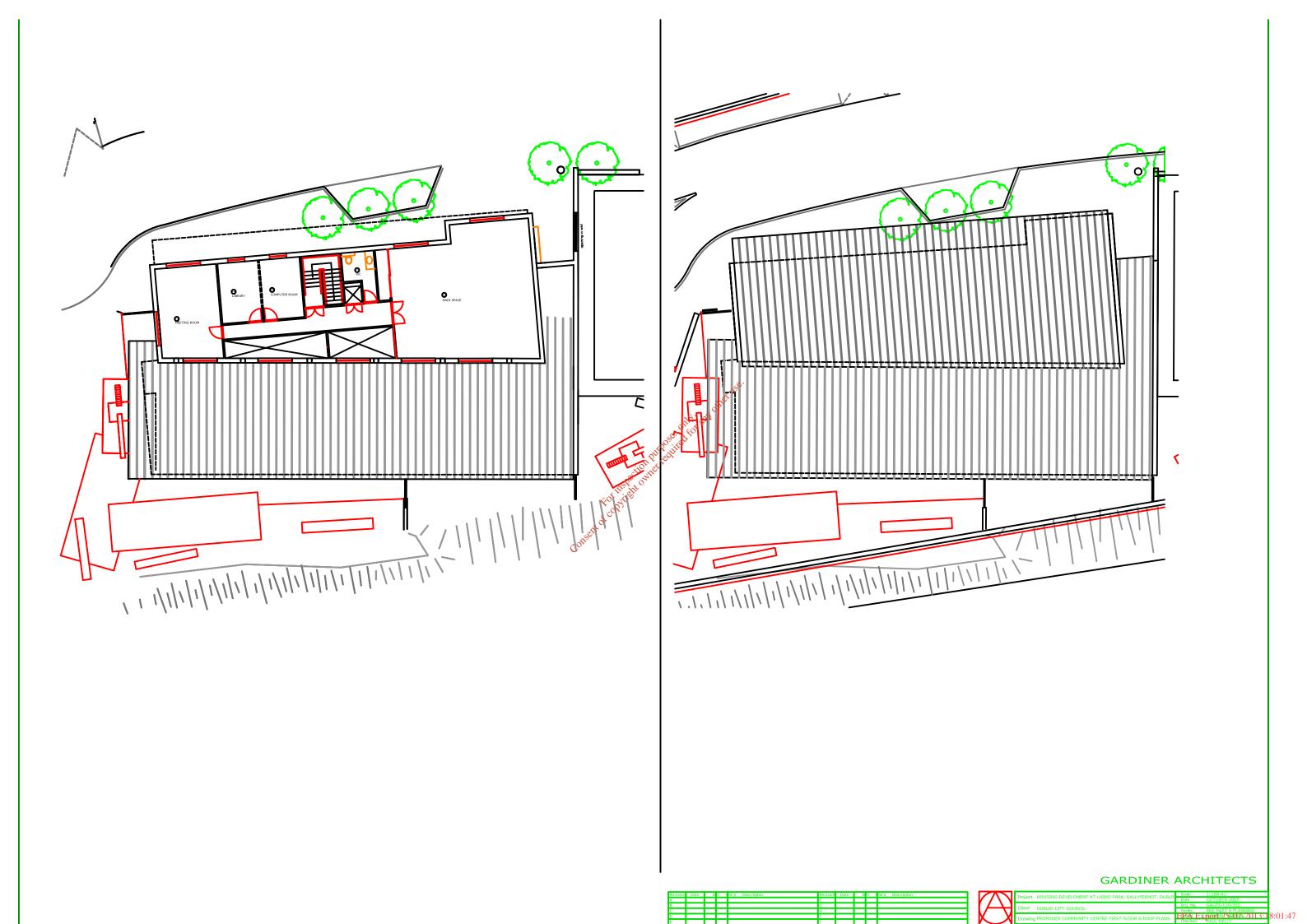
Appendix 6: Drawing of New Housing Development and Community Centre











Appendix 7: Findings on Site Investigation





TECHNICAL REPORT

FINDINGS OF SITE INVESTIGATION AT LABRE PARK, DUBLIN 8

Patel Tonra
Environmental Solutions

Report prepared by: Mairead Morrissey, Environmental Consultant

Our reference: MM/04/2348R03

Date: 14 April 2005

EXECUTIVE SUMMARY

A Site Investigation was carried out on the 3rd December 2004 at a proposed Civic Amenity site at Labre Park, Ballyfermot, Dublin 8. The site investigation was carried out by Mairead Morrissey of AWN Consulting, and was attended by John Rea and Conor Tonra (Patel Tonra).

6 no. trial pits were excavated and logged during the S.I. Photographic records were also taken of the trial pits. Fill material was found in all of the pits, some of which contained C&D waste, and 2 of which contained domestic waste, partially decomposed.

There was a thin layer of topsoil overlying the entire site, between 30 - 80 cm in depth. The trial pit logs indicate that waste material was deposited at the site over a number of years. This fill material was eventually overlaid with a deposit of topsoil, which has a limited amount of vegetation.

It is recommended that a contamination assessment is carried out at the site prior to construction.

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- 2.0 SITE DESCRIPTION AND HISTORY
- 3.0 **DESIGN OF SITE INVESTIGATION**
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- Consent of copyright outlet required for any other use 5.0 DISCUSSION OF SIGNIFICANCE OF RESULTS
- CONCLUSION 6.0

1.0 INTRODUCTION

AWN Consulting were instructed by John Rea of Patel Tonra Environmental Solutions, to undertake a site investigation at the Labre Park site, Ballyfermot, Dublin 8.

The main aim of the site investigation was to determine the presence, nature and possible extent of soil contamination at the Labre Park site.

2.0 SITE DESCRIPTION AND HISTORY

The proposed site is located within Labre Park, in Ballyfermot. Labre Park is bordered to the south by the Grand Canal, to the north by residential housing, to the west by industrial development and to the east by a bridge over the canal (Kylemore Road).

The site itself has not been developed previously. It is believed that the land has been waste ground for a number of years. There is evidence on the site that is has been used as a dumping ground until recently, with scrap cars, glass bottles, waste timber etc found across the site. The site is used by the adjacent halting site as grazing for horses.

3.0 DESIGN OF SITE INVESTIGATION

The site investigation consisted of the excavation of trial pits across the proposed site. A track excavator was used for the purpose of the excavations.

The investigation was designed following guidance provided in BS 10175:2001 - Investigation of Potentially Contaminated Sites – Code of Practice.

Due to the presence of overhead pylons and electricity wires, and also due to an underground foul sewer running approximately west to east, care was taken to avoid using the excavator in areas that may have damaged pipes or created a safety hazard.

4.0 RESULTS

The location of the trial pits is shown in Table 4.1 and can be seen in Figure 4.1 at the end of this report.

Trial Pit	Co-ordinates		Depth
No.	Easting	Northing	cm
1	309889	232583	180
2	309922	232587	190
3	309958	232580	200
4	309995	232572	210
5	310027	232564	210
6	310029	232592	210

Note: Handheld GPS +/ - error 10 m

The trial pit logs are presented as Appendix 1 to this report.

The trial pit logs show that a mixture of waste materials was encountered beneath the top layer of soil, i.e. a minimum of 30 cm below ground level.

Trial Pit No. 1 showed the fill material to be clean C&D (Construction and Demolition) waste, predominantly clay material, with a few stones, plastic fragments, and pieces of asphalt.

Trial Pit No.s 2, 3 and 5 showed what appeared to be commercial waste, again primarily C&D waste, but which also contained bags of un-identified granular material (TP 2 and 5 only) and partially decomposed organic material.

Trial Pit No.s 4 and 6 contained municipal solid waste, including plastic bottles, textiles, cardboard and paper and decomposed organic material.

Boulder clay was encountered beneath the fill layer at depths of between 1.8 and 2.0 m in Trial Pits 2, 5 and 6. Water ingressed slowly into the pits in Pits 4 and 5, at approximately 1.8 m below ground level.

5.0 DISCUSSION OF SIGNIFICANCE OF RESULTS

Trial Pit No. 1 was the most westerly pit, and showed evidence of fill material, which was predominantly C&D waste. There was no staining or odour from the pit when excavated, and therefore no signs of contamination.

The trial pit logs showed that there are significant quantities of waste material across the site, which appears to have been deposited intermittantly over a long period of time. The domestic waste found in Trial Pits No. 4 and 6 was found to be partially decomposed, giving off an odour of rotting material.

Trial Pits 2, 3 and 5 showed mixed C&D waste. Again, no hydrocarbon odour or staining was detected during the investigation, however the fill material should be classed as waste.

In Trial Pits 4 & 6 there was a layer of domestic waste, from 0.8 m to 2.1 m and from 0.4 m to 2.0 m below ground level respectively. This material was decomposing and an odour of hydrgen suphide was noted at each of these locations during the investigation.

The water ingress was not believed to be groundwater, but water confined by the underlying boulder clay.

It is recommended that prior to construction a contamination risk assessment is carried out at the site. Appropriate remediation will be proposed depending on the fingings of the contamination assessment.

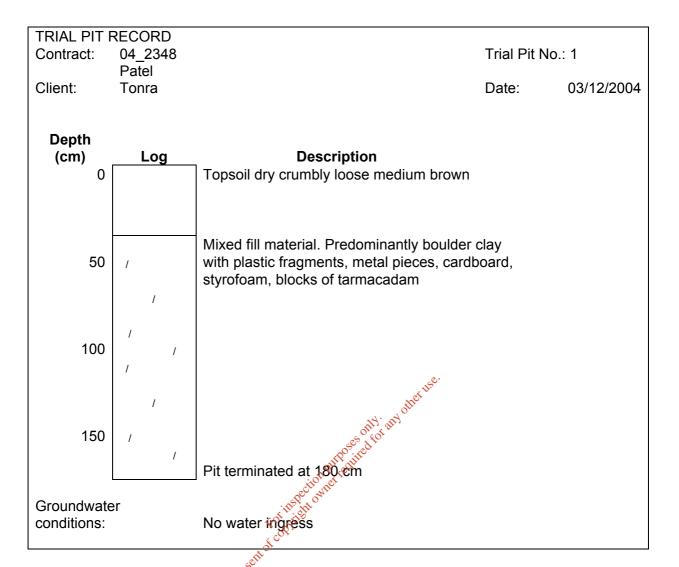
6.0 CONCLUSION

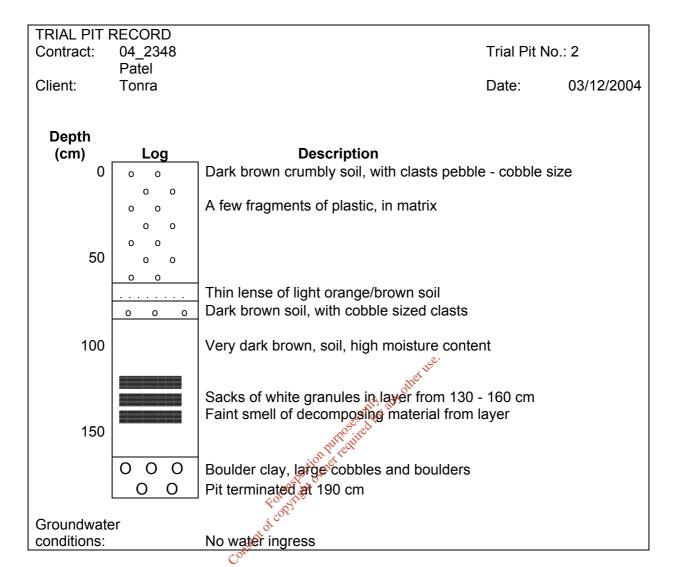
Waste material was found in all of the pits excavated. The predominant waste type was C&C (Commercial & Demolition) waste, however, domestic waste was noted in two trial pits to the east of the site.

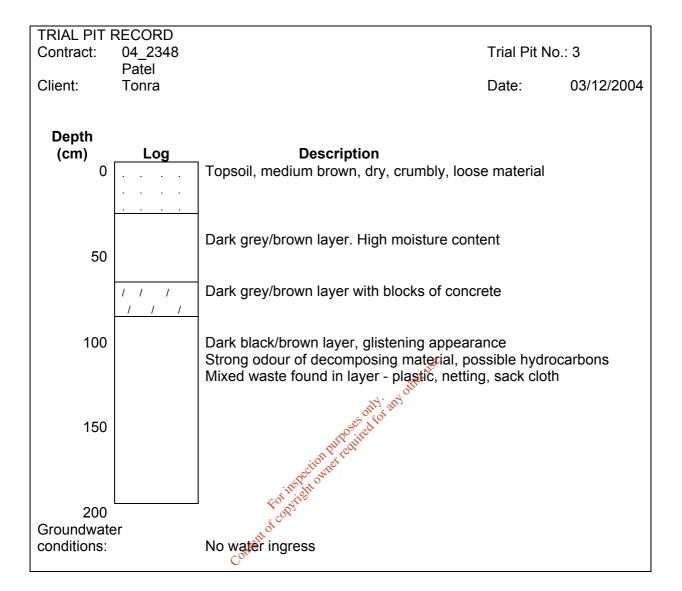
Further investigation will be required in order to determine the exact nature of the waste material.

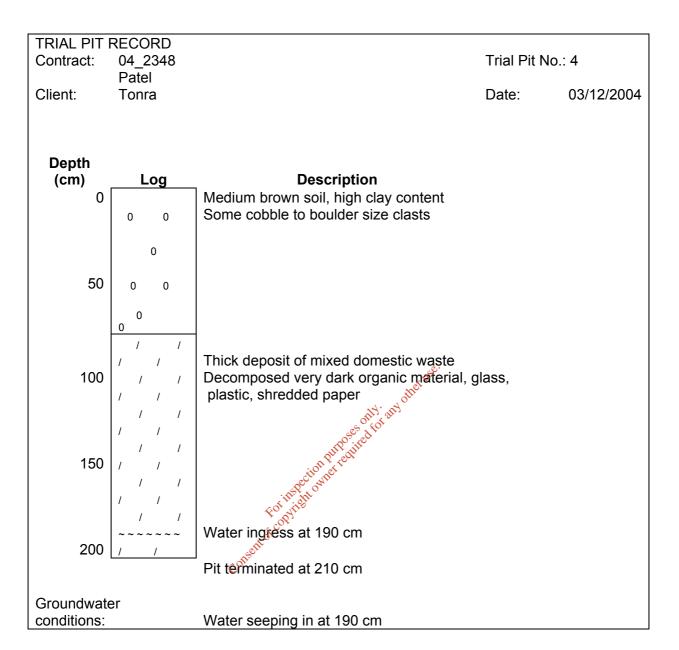
APPENDIX 1 TRIAL PIT LOGS

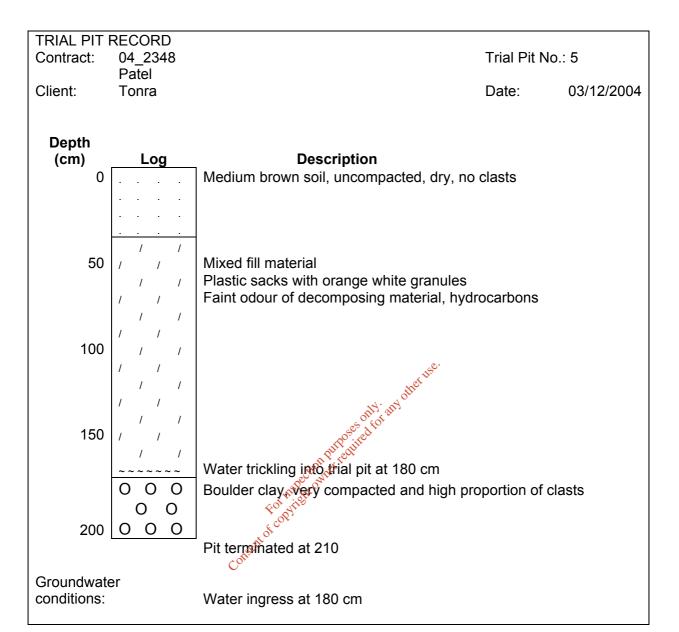
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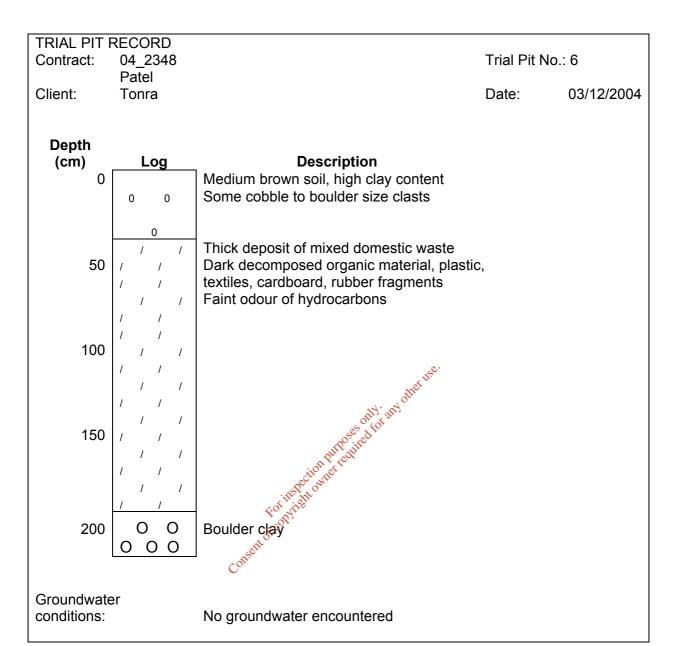












PLATES

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Plate 2 Trial Pit 1 Fill Material



Plate 3 Trial Pit 2



Plate 4 Trial Pit 2 Fill Material



Plate 5 Trial Pit 3



Plate 6 Trial Pit 3 Fill Material





Plate 8 Trial Pit 4 Fill Material



Plate 9 Trial Pit 5



Plate 10 Trial Pit 5 Fill Material





Plate 12 Trial Pit 6 Fill Material

APPENDIX 2- REVISED ATTACHMENT B7

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ATTACHMENT B.7 TYPE OF WASTE ACTIVITY, TONNAGES & FEE

The relevant activities to which this application relates as specified in the Third and Fourth Schedule of the Waste Management Acts 1996 to 2003 are detailed below.

The Principle Activity to be carried out at the site is Class 13, Fourth Schedule. This is defined as:

"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."

The Civic Amenity Site will provide for the collection of recyclable materials such as glass, plastics, beverage cans and textiles. The facility will also cater for the collection of construction and demolition waste derived from households, household hazardous waste and other bulky wastes. The recyclable materials will be stored on site in sealable containers prior to being collected by permitted waste collection contractors and taken off site for recovery. Designated containers will also be provided to facilitate the collection of separate organic waste, i.e. green waste, hedge clippings, tree clippings, etc. Green waste will also be compacted on-site prior to being shipped off-site for recycling.

The development is also covered under the following Classes Herris

Third Schedule, Class 13- "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."

The operation of the facility will involve the temporary storage of residual domestic waste prior to its dispatch from the site to alternative waste disposal facilities. Waste from the street cleaning vehicles will also be temporarily stored on-site prior to removal off site for disposal.

Fourth Schedule, Class 3- "Recycling or reclamation of metals and metal compounds." Designated containers will be provided for the collection of bulky metals e.g. old bicycles, steel frames, copper piping, etc. A separate container for beverage cans will also be provided.

Fourth Schedule, Class 4- "Recycling or reclamation of other inorganic materials."

Designated containers will be provided for the collection of inorganic materials, such as construction and demolition waste derived from household renovations, conversions, etc.

A detailed site investigation programme was undertaken within the Labre Park site in March/April 2005. As part of the site investigation programme 30 No. trial pits were excavated cross the site to determine the nature and extent (both lateral and vertical) of the materials infilled above natural ground. The findings of the site investigation programme indicate that the thickness of the inert fill material varies from 2.5m to 3m across the site, giving a volume of between 95,000m³ (2.5m thick fill) to 114,000m³ (3m thick fill). This material will be left insitu and will remain undisturbed where possible.

APPENDIX 3- DRAWING NO.1260/01/301

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