

Non Technical Summary of the Waste Licence Application for the Access Skips Recycling Centre at JFK Industrial Estate, Naas Road, Dublin 12

Introduction

Lawlor Brothers Waste Disposal Ltd. trading as Access Skips presently operates a Recycling Centre on a 0.77ha site at J.F. Kennedy Road, J.F. Kennedy Industrial Estate, Naas Road, Dublin 12. The existing site comprises two waste processing warehouses (Building 1 to the north of the site and Building 2 to the rear of the site), an open concrete yard in between and car parking to the front (northern side) of Building 1. Building 1 incorporates the site administration offices, a plant maintenance facility and construction and demolition waste processing. The recycling of commercial and industrial waste is handled in Building 2 which houses a trommel screen, conveyor and hand picking station. The company have recently acquired the warehouse premises immediately to the east of their own site and intend to expand their operations over the existing and newly acquired sites. The newly acquired warehouse will be demolished and replaced with a new purpose built waste processing building (Building 3). The new building will occupy the same footprint as the existing warehouse and will be higher, ranging in height from 10m at the front facade to 13m at the highest point near the rear (southern end). Between the two sites it is proposed to process some 95,000 tonnes/annum of waste in total. Waste processed at the site

will include dry, non-hazardous, solid, commercial, industrial, household, construction and demolition waste.

The facility will consist of a waste recycling centre that will sort and segregate different types of non-hazardous, solid, dry recyclable waste. Waste will comprise in the main cardboard, paper, plastics, ferrous and non ferrous metals, clay, stones, bricks, blocks, concrete, glass, household waste, textiles and wood (It is proposed that the domestic type waste will amount to some 9,500 tonnes/annum). Waste segregation will be carried out by a combination of mechanical and manual sorting processes. Waste will be loaded onto a conveyer belt where it will be segregated by various methods including trommel screening (to separate by size), magnet use to extract ferrous metals and handpicking to effect final waste segregation. A shredder may also be used to 'size' the material and some of the segregated wastes such as paper, cardboard and plastic will be baled.

All waste handling will be carried out in doors inside the new main processing building (Building 3). This will significantly reduce the potential for windblown litter, noise and dust. As only minor quantities of organic and putrescible wastes will be processed at the site there will be no significant odours generated. Handling the waste inside a fully contained building with roof, concrete floor and concrete lower walls will eliminate the potential for leachate generation as rainfall will not gain access to the waste.

Segregated wastes will be stored temporarily inside buildings 1 and 2 awaiting collection and transportation to other recycling facilities. It is planned that some 75% of the waste will be recycled and recovered. The remainder will be disposed at EPA licensed landfills or exported to approved recycling/disposal facilities.

All waste delivered to and from the site will be transported in fully contained trucks with tarpaulin covers or netting and will comply with all waste collection permit requirements.

Waste Licence Application

This non technical summary forms part of the Waste Licence Application relating to the proposed development and has been prepared by Access Skips and their Consultants along with an Environmental Impact Statement and a Planning Application which has been previously submitted to South Dublin County Council

The Waste Licence Application describes both the existing and proposed environment into which the proposed development will be placed. Potential impacts resulting from the development, proposed waste intake and stability of the company at present are outlined in the Waste Licence Application together with proposed mitigation measures, which will prevent or reduce the identified potential impacts.

This Section summarises the Waste Licence Application and describes the scale and scope of the proposed development.

Location and Setting

The site is located in John F. Kennedy industrial estate in the functional area of South Dublin County Council. The site measures 0.77 ha., is generally flat at a height of approximately 90 m.OD and is bounded by J.F. Kennedy road to the north and industrial warehouses/premises on all other sides. Killeen road runs north to south some 120m to the west and Nangor road runs west to east some 100m to the south. The existing site infrastructure comprises the aforementioned buildings 1 and 2, a weighbridge, security gate, fencing, lighting and drainage infrastructure. The site is served by three phase electricity, telecommunications, public water mains, storm water drainage and foul water drainage. The eastern part of the site houses the warehouse that is to be demolished and replaced by a new warehouse (Building 3). It is also planned to construct a wheelwash, a truck wash and an oil storage bund and to upgrade the storm water drainage system on site to include new drains, a silt trap and an oil interceptor.

Planning Context

The South Dublin County Council Development Plan was consulted and the development of the Recycling Centre is consistent with the current planning status and policies for the region.

The existing recycling centre obtained planning permission in 2002 and the newly acquired site also had planning permission.

It is proposed to seek planning permission for the expanded facility covering both sites and to include for all of the new development works and for the proposed change of use. The proposed new expanded facility is situated within an area zoned "Industrial" in the County Development Plan.

The Regional Planning Guidelines for the Greater Dublin Area (GDA) were reviewed. The guidelines focus on development within the region and include for the development of waste management infrastructure. The guidelines clearly state the need for additional waste management infrastructure, promotion of interregional solutions and the co-ordination of strategic plans for waste management within the region.

It is considered that the proposed facility fits in with the objectives and requirements of both the GDA regional Planning Guidelines and those contained in the South Dublin County Development Plan.

National and Regional Waste Policies

National Policies on Waste Management and the Waste Management Plan for the Dublin Region (comprising Fingal County Council, Dublin City Council, South Dublin County Council and Dun Laoghaire-Rathdown County Council) were researched to ensure that the proposed Recycling Centre was compatible with the policies and aspirations of these policy documents. National Policy documents include "Changing Our Ways", "Delivering Change"

and "Taking Stock and Moving Forward". The proposed development fits in well with National Policies and the Waste Management Plan in terms of the following: (i) Meeting national targets by promoting recycling, reuse and recovery over landfill and in dealing with priority waste streams (ii) Fits in well with the role of private sector involvement in waste management as stated in the policy documents and waste management plans; (iii) The Proximity Principle – the proposed site will be located proximal to the source of waste arising within the Company's waste collection region in the Greater Dublin region and is easily accessible via the N7 national primary road and the M50 motorway; (iv) Polluter Pays Principle – The full costs of recycling and disposal of waste will be borne by the Access Skips customers by collection fees. (v) The Recycling Centre has been located in accordance with all criteria as set out in the Waste Management Plans and all other relevant environmental Regulations and guidelines.

Alternatives

Alternative waste management practices broadly include the 'prevention' of waste, energy recovery (thermal treatment) and waste disposal. Access Skips is not a waste producer and therefore has no control over the prevention of waste. The proposed recycling centre will provide a better and more acceptable alternative for the management of waste compared to either energy recovery (thermal treatment) or waste disposal (to landfill).

The location of the site in an industrial estate on the edge of the city is considered an ideal location for this type of facility particularly in terms of its proximity to waste sources, access to recycling markets, proximity to disposal facilities and taking into account environmental considerations. Proximity to the N7 and M50 motorways provides excellent access for the facility in terms of sources of waste and destinations of processed materials.

Existing Environment

The development site is located in the middle of an Industrial Estate in the Southwestern suburbs of Dublin City.

The site is surrounded by industrial/commercial warehouses and offices. There are three residential houses located some 110m to the west of the facility on Killeen road.

The development site is flat at a height of approximately 90 m.OD. Drainage from the site will be collected and drained to the main storm water drains servicing the industrial estate. These discharge to the Cammock River, a tributary of the River Liffey.

The average annual rainfall for the area is estimated at 761mm. The main wind direction is from the West and the south west. Average annual temperatures range from 5°C in Winter to 15°C in Summer.

Results from several air monitoring stations operated in the Dublin region indicate that

ambient concentrations of smoke and SO₂, are less than EU standards.

Total dust was monitored at 3 No. Locations on the site and the results indicated that dust levels were well within the recommended deposition limit of 350 mg/m²/day (TA –Luft guidelines).

Noise measurements were made at the site boundaries and nearby sensitive receptors. Baseline values were representative of a setting in close proximity to an industrial estate.

The bedrock underlying the site is composed of Carboniferous limestones with occasional interbeds of shale and is generally referred to as Calp limestones.

The bedrock is overlain by a layer of silty to sandy clay and results from a nearby investigation indicated the overburden as less than 5m thick.

The aquifer status of the bedrock underlying the site has been classified by the Geological Survey of Ireland as a 'Locally Important aquifer (LI). It is extremely likely that all houses/businesses within 500m of the site are connected to the public mains water supply. Regional groundwater flow is likely in a northeasterly direction towards the river Liffey and mirroring the surface water drainage pattern. The available information suggests that natural aquifer vulnerability should be assigned a rating of high.

The site is drained by mains drainage within the industrial estate which discharges to the River Cammock.

A surface water sample was collected from the existing storm drain before it exited the site. The results indicated slight contamination of the water with slightly elevated levels of ammonia, manganese and BOD.

The proposed site is not covered by any nature conservation designations. The nearest designated site is the Grand Canal that flows from west to east about 400m to the north of the site.

There are no significant ecological habitats at the site. There is small ornamental planting in the northwest corner and sparse weed growth recorded along some of the site boundaries. These are of low ecological value.

The site is located in an industrial estate dominated by commercial and industrial units. Therefore the predominant landuse in the immediate vicinity is industrial/commercial.

There are 3 residential dwellings located about 110m to the west of the site on Killeen road. The industrial estate represents a significant source of employment for local population centres and the Greater Dublin area as a whole.

The morning and evening peak traffic hours were recorded in the surveys as being 0800-0900hrs and 1700-1800hrs respectively.

The landscape character in the direct vicinity of the development is commercial/industrial in nature, comprising commercial and industrial units surrounding the site on all sides.

There are no protected views in the vicinity of the site.

There are no Tree Preservation orders identified in the direct vicinity of the proposed site no listed buildings or buildings under consideration for preservation in the direct vicinity of the site and no areas identified as Sensitive Landscapes or Special Amenity Areas in the vicinity of the site.

There is no evidence of any significant archaeology at or in the vicinity of the site. The entire site and surrounds have already been developed as industrial units with warehouses and hardstanding. Therefore, any surficial archaeology at the site or surrounds will already have been removed.

There are no tourist features in the direct vicinity of the site. The Grand Canal runs from west to east about 400m to the north and is not visible from the site due to intervening commercial and industrial structures. Commercial and industrial enterprises are by far the most important material assets in the locality.

The N7 dual carriageway, from which the site will be accessed (via Nangor road and Killeen road) is located to the east of the site. Access to the nearby M50 motorway is

via the N7 south. The facility is served by electricity, water mains, telecommunications, main foul drainage and main storm water drainage. There are no quarries or sand pits of significance within the vicinity of the site.

Description of the Proposed Development

Access Skips propose to develop a recycling centre for the treatment and processing of dry non-hazardous solid waste. The facility will process commercial, industrial, household, construction and demolition wastes comprising in the main of paper, cardboard, plastics, timber, ferrous and non ferrous metals, clay, stones, bricks, blocks, concrete, glass, some domestic waste and textiles. The Company plan to process some 95,000 tonnes/annum within five years (approximately 10% of this will comprise domestic type waste).

The existing site infrastructure consists of the following:

Two large warehouses (Building 1 and Building 2) with an open concrete yard in between and car parking located to the north of Building 1 and south of the JFK road. Building 1 (758 m²) houses the facility offices, canteen, meeting rooms, weighbridge office and washrooms to the front (northern) part of the building. The rear of Building 1 is used as a plant maintenance facility and for the processing of construction and demolition (C&D) waste. Building 2 (615 m²) is used for the processing of commercial and industrial wastes and

houses a trommel screen, magnet and hand picking station. There is a weighbridge located to the east of Building 1. The newly acquired premises consists of a warehouse (Building 3) measuring some 1,882 m², an open concrete yard to the rear (southern side) and car parking to the front (northern side). The proposed development plan includes for the demolition of this building and replacing it with a new purpose built warehouse for the processing of waste. The new building will occupy the same area as the demolished building (1,882 m²) but will be higher rising from 10m at the front (northern) facade to 13m near the rear (southern side). It is proposed to install a wheelwash adjacent to the northern side of the weighbridge (near the site entrance), a truck wash in the yard to the rear of Building 3 and a concrete containment bund for the storage of oils in the southeastern corner of the site. The new Building 3 will be constructed of concrete floor and lower walls with kingspan cladding on the upper walls and roof. All future waste processing will be carried out in this building and it will house a trommel screen, magnet, conveyors, handpicking station, shredder and baler. There will also be a waste inspection area and a waste quarantine area located in the building. Building 1 will be used for plant maintenance and for the processing of C&D waste during extremely busy periods or while maintenance is being carried out in Building 3. Building 2 will be used for the storage of recycled wastes and the processing of commercial and industrial wastes during extremely busy periods or while maintenance is being carried out in Building 3.

The remainder of the site will consist of concrete hardstand and will be used for the marshalling of trucks and for truck and skip parking.

The area to the front of Buildings 1 and 3 will be used for car-parking.

The oil bund will be used for the storage of site plant diesel, oils for truck maintenance, waste oils from truck maintenance and waste oils that may inadvertently arrive on site in the middle or large skip/truck loads.

It is proposed to maintain the existing foul drainage system from Building 1 which connects to the main foul drain servicing the industrial estate. A new storm water system will be installed at the site. This will entail the installation of a silt trap and a class 1 full retention oil interceptor. All yard drainage will be directed through the silt trap and oil interceptor prior to discharge to the mains storm drainage system serving the industrial estate. The site will be secured by palisade fencing around the boundaries and the installation of a galvanised steel palisade gate at the entrance. Adequate lighting will be provided at the site and the need for CCTV cameras will be reviewed.

Traffic will be controlled by signage and direction from the weighbridge operator.

Fire fighting water will be provided by the public mains water system and fire engine trucks. Fire alarms and smoke detector alarms will be installed in all buildings. Fire extinguishers and fire hoses will be installed

strategically within the office and warehouse. Every entrance/exit to the warehouse will have a low concrete ramp installed. In this way the vast bulk of any contaminated fire water will be contained within the warehouse building. A dust suppression system will be installed inside Building 3. This consists of a number of rotary atomisers that produce a water mist that attaches to the dust particles and causes them to sink to the floor. These also have the capability to be used for spraying perfumes or insecticides in the unlikely event that they will be required. Individual parts of the recycling plant (e.g, shredder) will have dust suppression spray systems installed and there is a negative air pressure system in the hand picking station.

Waste will be transported to the site by trucks or skips. All wastes will be covered by tarpaulin or netting. Trucks arriving on site will go directly to the weighbridge where the waste will be inspected and the waste load will be weighed and fully documented. The truck will then be directed to the main processing area of Building 3. The waste will be tipped on the floor and inspected. If it requires detailed inspection it will be removed to the waste inspection area. Any unacceptable wastes will be removed to the waste quarantine area where they will be stored temporarily until they are exported off site to authorised facilities. Acceptable wastes will be processed as follows:

The larger wastes fractions will be segregated from the tipped out waste by a grab machine. These usually comprise large pieces of timber and metals. The

remaining wastes are loaded onto the processing line. The processing line comprises a range of waste segregation elements including trommel screen, magnets to remove ferrous metals and handpicking lines where individual waste types can be picked out and segregated. The end result of the processing segregates wastes into different waste types and sizes. Wastes may then be sized, baled or compacted into trucks for export off site. It is planned that the process will recycle approximately 75% of the waste received on site. Recycled wastes will include paper, cardboard, metals, timber, plastics, cover material for landfills and perhaps refuse derived fuel. These may be baled and will be exported off site to relevant facilities for further processing. The residual waste will be compacted and exported off site for disposal at Balleally landfill or other licensed facilities.

It is proposed that the facility will be open 24 hours a day and seven days a week for the receiving of wastes. The bulk of the recycling processes will be carried on between 8am and 8pm.

All wastes accepted at the site will be inspected, weighed and documented at the weighbridge as it enters the site. There are specially designed waste inspection and waste quarantine areas where wastes can be given a detailed inspection and quarantined if necessary. Any unacceptable wastes will be quarantined on a temporary basis and removed off site to a relevant licensed facility at the earliest opportunity. Wastes that have been processed will be

weighed and documented prior to their transport off site.

The location and the design of the facility along with the specified processes, procedures and mitigation measures will preclude the generation or impact from any potential nuisances such as aerosols, birds, dust, litter, odours, vermin or traffic.

There will be some potential emissions associated with the operation of the facility as detailed in Waste Licence Application and the main body of the EIS. These will include noise, dust and storm water emissions. The facility has been designed and the operation will be such that the volume and duration of these emissions along with the proposed mitigation measures will not allow for any significant impact on the local environment.

It is proposed to carry out dust, noise and surface water monitoring at the facility on a regular basis. Any environmental monitoring programme will be agreed with the EPA and/or the Local Authority in advance and will include all requirements that either of those bodies may have in relation to monitoring.

An outline decommissioning plan has been devised for when all operations cease at the site. It is planned that the site and basic infrastructure will be sold on to a prospective buyer. All other plant, equipment, machinery and infrastructure will either be sold or dismantled and recycled. All waste will be removed off site and the entire property will be swept and cleaned to an

acceptable standard. A post closure monitoring programme will be put in place in order to monitor the decommissioning process and the environment after the facility has closed.

An Emergency Response Procedure (ERP) has been devised and includes contingency planning in the unlikely event of an emergency. Plant and equipment breakdown will be handled rapidly by repairs or hire of alternative plant and equipment. Any leakages or spillages of oil will be handled by use of oil mats and booms and relevant expertise will be contracted immediately. Fire fighting capacity is provided for by the installation of fire alarms, extinguishers and water hoses in all buildings and staff will be trained in the use of this equipment. The fire brigade will be contacted immediately. Certain staff members will be trained in first aid management in order to deal with minor health and safety incidents. Phone numbers for all emergency services will be clearly posted adjacent to all telephones on site. All emergencies will be immediately reported to the EPA, South Dublin County Council and the Eastern Regional Fisheries Board as appropriate.

Potential Impacts, Mitigation Measures and Likely Significant Effects

The proposed Recycling development has the potential to impact on the receiving or existing environment at the industrial estate. However, by designing the facility to best international standards and by operating the facility under a Waste Licence to be issued

by the EPA the potential for impacting on the environment is greatly reduced or eliminated in many instances. Also, the implementation of a range of mitigation measures will ensure that the facility can be operated without causing nuisance to the local environment.

There will be no significant effect on climate from the proposed development

As only minor amounts of putrescible wastes will be handled at the facility and these wastes will be processed within a maximum 24 hours (generally within 8 hours) there will be no significant impact from odours. Potential dust emissions will be mitigated by handling all operations indoors, installation of dust suppression systems and a wheelwash and power sweeping and washing the open yard on a regular basis.

Treating all wastes inside the warehouse provides significant noise abatement for the process. Additional measures include keeping the main entrances/exits to Building 3 closed except when necessary, use of modern plant and equipment which include silencers, regular servicing of site plant and switching plant off or on to low idle when not in use. The bulk of the existing noise is generated by traffic and operations in the industrial estate. Taking into account the existing noise levels at the nearest noise sensitive receptors and the predicted noise levels from the site operations it is likely that there will be no significant impact due to the proposed recycling facility.

There will be no significant impact on soils or geology.

There is a potential to impact on both groundwater and surface waters from the proposed development. Potential impacts could arise from leachate, oil spills/leakages, yard washdown, contaminated fire water and sewage management. The potential for leachate generation will be completely controlled by treating all waste indoors inside a fully contained building. Therefore, any minor amounts of leachate that generate will be fully contained, collected and exported off site to an authorised waste water treatment plant. All oils and diesels will be stored in tanks inside a specially constructed concrete containment bund. Storm water draining from the yard or washdown from the yard will be collected in drains and directed through a silt trap and class 1 full retention oil interceptor prior to discharge to the main storm water drainage system servicing the industrial estate.

In the unlikely event of a fire at the facility water used to fight the fire will be largely contained within the buildings as the floors and lower walls are constructed of reinforced concrete and low concrete ramps will be provided at every entrance/exit to the buildings. Effluent from the facility canteens and washrooms will be directed to the main foul sewer drainage system servicing the industrial estate. All of these measures will ensure that there will be no significant impact on either groundwater or surface water at the facility.

The operation of the facility as proposed will not significantly impact on flora or fauna.

Potential impacts to the local community include impacts from traffic, noise, dust, litter, odours, visual intrusion, vermin, groundwater and surface water. All of these elements are detailed in the Waste Licence Application and the EIS and indicate little or no impact on the local community. The facility will create some employment and will require certain services and this will provide a positive impact in terms of the local economy.

The traffic assessment indicates that there will be no significant impact from the development on traffic or roads in the locality. The site is located in an industrial estate designed to accommodate heavy industry and the associated traffic volumes. In addition, the 24 hour a day opening hours will allow site associated traffic to be spread over 24 hours rather than concentrated into a smaller timeframe and every effort will be made to avoid truck movements during the morning and evening rush hours.

There will be no significant negative visual impacts resulting from the proposed development. The main potential impact will arise from the replacement of the existing warehouse with Building 3 which will be higher than the old warehouse. This is not an unusual situation in the JFK industrial estate where there are numerous examples of buildings higher than the one proposed. In addition, the new building will be finished with materials using a texture and colour that will blend in with the neighbouring

structures. The development will not obstruct any protected views or aspects.

The impact on the cultural heritage of the site and environs by this development will be negligible. It is likely that if any archaeological remains were present on the site they have been destroyed by pre-existing development.

The main possible impacts on local infrastructure include impacts on roads and traffic and are discussed in the main body of this document and are deemed to be negligible. There will be no significant negative impacts on commerce or tourism within the region. There will be a positive impact from the development in terms of providing employment and a much needed facility for waste management in the locality and broader Dublin region.

In summary, the existing site will be redeveloped and the proposed facility constructed in accordance with all relevant Regulations and Guidelines, using best practices, and in some cases with comprehensive mitigation measures put in place in order to minimise any possible impact on the local environment. The Waste Licence Application along with the EIS have detailed all potential impacts on the environment, the mitigation measures proposed and has concluded that it is likely that there will be no significant effect on the local environment arising out of the proposed expansion of the Access Skips recycling centre.