
Attachment A: Non-technical Summary

A.1 Introduction

This non-technical summary has been prepared in accordance with the requirements of Part III, Article 12 (1) (u) of the Waste Management (Licensing) Regulations 2004 and in support of a Waste Licence Application by South Dublin County Council for the operation of a Green Waste Facility at Esker Lane, Lucan, Co. Dublin.

A.2 Name, Address, Contact Details of Applicant

A.2.1 Name of Applicant:

South Dublin County Council

A.2.2 Address:

Environmental Services Dept.,
County Hall,
Town Centre,
Tallaght,
Dublin 24

A.2.3 Telephone/Fax:

Tel: 01 4149000
Fax: 01 4149101

A.2.4 Address for correspondence:

As per Section A.2.2 above.

A.3 Planning Authority

The proposed activity will be carried on in the functional area of South Dublin County Council planning authority.

A.4 Trade Effluent Discharge

There will be no trade effluent discharge.

A.5 Location of Proposed Facility

A.5.1 Postal Address

South Dublin County Council
Green Waste Facility
Esker Lane
Lucan
Co. Dublin

A.5.2 Grid Reference

National Grid Reference E304100, N234506

A.6 The Nature of the Facility

The proposed development currently operates as a Green Waste Facility, managed and operated by South Dublin County Council at Esker Lane, Lucan, Co. Dublin. The facility is currently permitted by the Environmental Protection Agency (EPA) under a Certificate of Registration (Number R261), dated 8th February 2000.

The total area of the site is approximately 8,337m².

The existing facility includes one on-site fixed structure in the north east of the site: a ca. 380m² office / equipment storage building. This is used to house vehicles and equipment overnight. This building will be retained under new proposals. The proposed site layout includes one additional structure on-site, i.e. a small portacabin unit in the west of the site to act as the weighbridge office.

The facility is open to members of the public and small commercial operators to deposit green waste, from where it is transported off-site for processing and composting. In the past, the material was shredded on site but shredding activities were discontinued in January 2006. The Waste Licence application, therefore, is for the acceptance and temporary storage of green waste only; no processing activities are proposed.

The facility offers an important outlet for green waste, both from domestic producers and small-scale commercial gardeners/horticulturists. The material is sent for composting to produce a good-quality, marketable product. The collection and composting of green waste, therefore, is in line with Government policy on waste management and recycling, in that it diverts material away from landfill, in particular biodegradable waste, for which the EU Landfill Directive (1999) sets specific landfill diversion targets. The 1999 Directive sets a progressive target of 65% diversion of biodegradable waste away from landfill.

The site comprises an area of reinforced concrete slab, which acts as the reception area and drop-off point for users. This area is marked and signposted to guide users through a one-way system. The remainder of the site acts as storage and operational areas for the green waste; this part of the site is comprised of compacted fill material.

There are a number of environmental/nuisance controls proposed in the Waste Licence Application, including:

1. It is proposed to extend the concrete slab to cover the entire operational area of the site – this will control dust and mud
2. Construction of boundary walls to minimise impacts on sensitive receptors

3. Silt trap and oil interceptor to control surface water drainage
4. Installation of a weighbridge to ensure that licence tonnage thresholds are complied with
5. Erection of a wind sock, to act as a guide for site operatives, that green waste handling should be minimised during very windy conditions
6. Construction of green waste deposit bays to control incoming waste
7. Use of retaining walls to control green waste storage areas
8. Improved road markings and signage to improve traffic flow and traffic management
9. A dedicated composting/recycling education/demonstration area will be established
10. The rear of the site will be disused and fenced off from site operations

The maximum annual tonnage proposed in the Waste Licence Application is 20,000.

A.7 Class of Waste Activity

The principle activity, in relation to the Schedules of the Waste Management Acts 1996 to 2005, is Class 13 of the Fourth Schedule (Waste Recovery Activities), "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".

Green waste (including hedge trimmings, grass clippings, trees/woody materials, etc.), delivered to the site by members of the public, is stored temporarily at the Esker Lane facility, prior to being moved off-site for shredding and composting.

In the past, green waste was shredded at the Esker Lane facility, prior to removal off-site. Shredding at the facility ceased in January 2006.

A.8 Quantity of waste recovered

It is proposed to accept up to 20,000 tonnes of green waste per annum.

The EWC code for green garden waste is 20 02 01 (biodegradable waste, from gardens and parks).

100% of materials accepted at the facility will be recovered.

A.9 Energy usage, fuel, raw material and other material usage

Energy is used on site in the form of:

- Diesel for site machinery
- Electricity for site buildings

Water is used on site for lavatory and bathroom facilities. A sprinkler system will be operated for dust control when required.

Water is currently harvested from the roof of the building on site.

A.10 Plant, Processes and Operating Procedures

A.10.1 Plant

Four waste handling machines are used at the Esker Lane facility: two are council-owned and operate on a full-time basis, i.e. a 2001 model Landini top 165 tractor with front-end loader, and a JLG telescopic loader with 1.5 cubic meter bucket. Two machines are contractor-owned, i.e. two 2004 JCB telescopic loading shovels 530/70 fitted with 3 cubic meter buckets. It is likely that the number of handling machines will decrease due to the cessation of on-site shredding since January 2006.

A.10.2 Processes

The Green Waste Facility provides a service for the disposal of green waste in a responsible, environmentally sustainable manner. Waste accepted includes all uncontaminated green waste such as tree prunings, leaves and grass cuttings.

The unit operations at the facility are as follows:

- Inspection/acceptance of incoming green waste
- Deposit of green waste by members of the public and commercial users
- Transfer of green waste from deposit area to holding area
- Loading of material for off-site removal
- Weighing of material out (this does not happen currently, but forms part of proposals for the Waste Licence Application)
- Removal off-site for composting

All green waste is inspected in its delivery vehicle at the reception area, prior to the entrance barrier, and again after it has been dropped off, in the waste deposit area. A strict waste acceptance policy is enforced at the facility.

Traffic on site is controlled primarily by the design and layout of the site, along with signage, road markings, barriers and verbal instructions from staff. On-site safety of users and traffic movement has been taken into account in designing the site layout and roads. The classes of vehicle using the proposed facility during operational hours will be as follows:

- Private vehicles using the green waste deposit facility
- Commercial vehicles delivering green waste to the facility
- Service vehicles collecting green waste from the Green Waste Facility
- Staff vehicles and visitors

All green waste brought to the site by domestic or commercial users will be removed off-site for shredding and composting. It is proposed to install an 'out' weighbridge, such that all vehicles removing green waste from the facility to the composting site will be weighed.

A.10.3 Abatement Systems

The following infrastructure is proposed as part of the design of the Green Waste Facility:

- Boundary walls (3m high) on two sides to prevent noise and dust migration
- Push walls and concrete storage areas
- Sprinkler system for dust suppression
- Rainwater collection system using the roof of the building will be attached to the sprinkler system
- Direction of traffic clearly labelled with appropriate signage

A.10.4 Operating Procedures

An EMS (Environmental Management System) will be developed in line with EPA requirements, with relevant procedures, etc. documented and implemented, upon granting of a Licence. Currently operational control procedures are in place and implemented, but undocumented.

A.11 Information Required under the Waste Management Acts, 1996 to 2005

Section 40(4) of the Waste Management Acts 1996 to 2005 states that the Agency shall not grant a waste licence unless it is satisfied that the following points have been complied with:

(a) any emissions from the recovery or disposal activity in question ("the activity concerned") will not result in the contravention of any relevant standard, including any standard for an environmental medium, or any relevant emission limit value, prescribed under any other enactment

The facility will be managed and operated to minimise environmental impact. Environmental monitoring is proposed for dust, noise and odour to ensure that relevant emission limit values are not exceeded.

(b) the activity concerned, carried on in accordance with such conditions as may be attached to the licence, will not cause environmental pollution,

The facility will not cause environmental pollution. Proposed activities are low environmental risk, i.e. the acceptance and short-term storage of green waste, prior to off-site shredding and composting. Routine monitoring will ensure that no pollution is being caused. Furthermore, the Applicant has recently elected to discontinue green waste shredding at the site, with the result of reducing dust and noise emissions.

(bb) if the activity concerned involves the landfill of waste, the activity, carried on in accordance with such conditions as may be attached to the licence, will comply with Council Directive 1999/31/EC on the landfill of waste

Not applicable

(c) the best available technology not entailing excessive costs will be used to prevent or eliminate or, where that is not practicable, to limit, abate or reduce an emission from the activity concerned,

The Applicant has included proposals for significant capital investment to eliminate or control emissions, e.g. surface water management system,

concrete hardstanding, boundary walls, retaining walls for stored green waste, sprinkler systems, in line with EPA BAT (Best Available Technology) Notes for Transfer Facilities.

(cc) the activity concerned is consistent with the objectives of the relevant waste management plan and will not prejudice measures taken or to be taken by the relevant local authority or authorities for the purpose of the implementation of any such plan

The Waste Management Plan for the Dublin Region (2005-2010) makes the following references to the Esker Lane Green Waste Facility:

3.4.2 Green Waste: There were a number of submissions from the private sector gardening and landscaping organisations concerned about the imminent closure of Esker Lane and the lack of proposed facilities for drop-off of both household and commercial green waste within the Region.

18.7.2 Green Waste Capacity: Green Waste facilities are required for garden and landscaping waste, a long-term capacity of up to 50,000 – 80,000 tonnes/annum is required. The Local Authority will consider developing this capacity alongside existing or proposed facilities. Development of capacity in the private sector is also encouraged. South Dublin County Council operates a green waste facility at Esker Lane.

Shredding and/or Transfer facilities will be developed by the Local Authorities, it is proposed that two facilities be operational by the end 2005 and four facilities by end 2006. These will accept green waste from householders and from landscapers. Waste will be shredded or bulked and loaded onto trailers for onward transfer to composting facilities. Locations currently identified as potential sites for reception / shredding/ bulking/ transfer include: Esker Lane (South Dublin), Operational for waste reception

11.3.1 Green Waste Composting

Up until 2004, two facilities were in place in the Region:

- **St Anne's Park** in Raheny, operated by DCC with a capacity of approximately 20,000 tonnes/annum. This facility was forced to close in 2004.
- **Esker Lane, Lucan**, operated by South Dublin County Council with a capacity of approximately 5,000 tonnes/annum.

The 1998 Waste Management Plan had called for an expansion of green waste composting capacity. The Esker facility in South Dublin has provided some of this extra capacity, but the demand for green waste composting services is increasing with the growing numbers of suburban gardens and expanding landscaping industry. With the closure of St Anne's Park, the Region may have to rely on facilities in adjoining counties for green waste composting, until capacity can be developed closer to the source of the waste.

19.6 Policy for Biodegradable Waste

The Dublin Local Authorities will implement the recommendations of the Draft National Biodegradable Waste Strategy, and thereby fulfill the Region's role in meeting National targets under the EU Landfill Directive. This will be carried out by:

- Including prevention and minimization of biodegradable waste in its prevention programme (including the promotion of home composting)
- Separately collecting biodegradable waste from household and commerce/industry:
- Green waste to be collected at appropriate Recycling Centres for onward transfer to green waste composting
- Household and commercial food and garden waste for biological treatment and making high quality compost
- Developing energy recovery capacity at the Dublin Waste to Energy facility to treat any residual biodegradable waste

We conclude, therefore, that the Esker Green Waste Facility is in line with the Dublin Region Waste Management Plan.

(d) if the applicant is not a local authority, the corporation of a borough that is not a county borough, or the council of an urban district, subject to subsection (8), he or she is a fit and proper person to hold a waste licence,

Not applicable

(e) the applicant has complied with any requirements under section 53.

Financial commitments or liabilities will be addressed by the Applicant.

(f) energy will be used efficiently in the carrying on of the activity concerned

The facility will not be an intensive energy-user. The major energy requirements are in terms of equipment operation. Energy will be monitored and reported to the Agency on an annual basis.

(g) any noise from the activity concerned will comply with, or will not result in the contravention of, any regulations under section 106 of the Act of 1992

Regular noise monitoring will be conducted to ensure that noise emission limits are complied with.

(h) necessary measures will be taken to prevent accidents in the carrying on of the activity concerned and, where an accident occurs, to limit its consequences for the environment

Appropriate accident and environmental accident prevention procedures will be put in place.

(i) necessary measures will be taken upon the permanent cessation of the activity concerned (including such a cessation resulting from the abandonment of the activity) to avoid any risk of environmental pollution and return the site of the activity to a satisfactory state.

Appropriate closure and aftercare plans will be agreed with the Agency.

A.12 Emissions

Emissions to atmosphere may include dust and odour arising from the loading/unloading and short-term storage of green waste. The emission points will be from the reception, loading and storage areas located in the facility operational areas.

Surface water on the site drains to a channel along the western boundary. It enters the adjacent Pumping Station via a manhole located in the north-western corner of the site. There is no direct discharge to the Griffeen River, which flows approximately 100m from the site, at its closest point.

There are no direct emissions to groundwater from the site. Lavatory and washing facilities from the site office building are the only emissions to sewer.

The main noise sources associated with the site are traffic flows entering and leaving the site, and the operation of associated site machinery. The emission points will be from the entrance/exit area, the reception, loading and storage areas located in the facility operational areas.

A.13 Effects of Emissions

Dust deposition measured at the facility during November – December 2005 was well below the EPA general limit for dust at licensed waste facilities. This monitoring was carried out while shredding of green waste was still in operation at the facility. On the basis of the acceptable results from the monitoring carried out in 2005 and the cessation of shredding activities at the facility, it is expected that the impact of dust generation from the facility will continue to be insignificant.

Odour monitoring was carried out at the facility in November and December 2005. During monitoring, odour was detected within the facility boundary, with one perceived faint odour impact on sensitive receptors, located to the north east of the facility on Esker Lane. It was concluded that the odour arose from traffic fumes, and the operation of the green waste facility which may be perceived as "possibly offensive".

Surface water and foul water emissions from the facility will have minimal impact on the environment.

Noise emissions from the site were monitored in November and December 2005. In December 2005 the noise levels recorded at two residential locations were above the EPA guidance limit of 55dB during daytime operations. However, the noise levels measured at these locations (and at the school close to the site) do not appear to be dominated by noise from the site but other sources including road traffic and nearby construction activity.

The Esker site is not in operation during the night-time period and therefore has no impact on the night-time environmental noise climate in the area.

A.14 Monitoring Proposals

It is proposed to monitor dust twice per year at four locations within the facility boundary, adjacent to sensitive receptors as shown on Figure F.2.1.

It is proposed to monitor odour at three locations adjacent to sensitive receptors as shown on Figure F.2.2.

It is proposed to carry out surface water monitoring annually at a manhole in the north-west of the site as shown on Figure F.3.1. The monitoring point will be located after the proposed silt trap and oil interceptor, and directly before emission to the Pumping Station.

There are no direct emissions to groundwater, therefore no monitoring is proposed.

It is proposed to monitor noise annually at four locations adjacent to sensitive receptors as shown on Figure F.6.1.

Daily visual inspection of wind force and direction will be carried out to ensure that operations are controlled if weather conditions would cause nuisance to neighbours. It is proposed to install a windsock at the facility so that site operatives can visually assess the wind direction and force (See Figure D.1.1)

A.15 Waste Arising from the Activity

100% of the green waste accepted at the site will be sent for composting and therefore recovered. This is in line with Government and Regional policy on diversion of waste away from landfill. This is particularly important for biodegradable waste, which, if landfilled, will generate landfill gas.

There will be no waste arising directly from the activity. A strict waste acceptance policy is enforced at the facility. Unacceptable wastes will not be allowed on site. In the event that unacceptable waste enters the site, the user will be asked to remove it to an appropriate facility. It is proposed that in the event of illegally deposited waste being left at or outside the facility outside of operational hours it will be held in a dedicated waste quarantine area pending removal to an appropriate EPA-approved facility.

Office/kitchen waste generated by site staff will be disposed of by a licensed/permited waste contractor.

A.16 Waste Treatment Off-site

All green waste deposited at the site will be transported for shredding and composting to a facility operated by Bord na Mona plc. at Kilberry, Athy, Co. Kildare – Waste Licence Number 198-1.

A.17 Contingency Plans

If for any reason the facility is required to cease the acceptance of material, it will be the responsibility of the site operators to redirect those persons wishing to dispose of green waste to the nearest disposal facility. The public will be notified in advance (where possible) to advise of any unforeseen need for non-acceptance of materials at the site.

If the Bord na Mona facility at Kilberry, Athy is not in a position to take green waste from the Esker Lane facility for composting due to any unforeseen circumstances, as a contingency arrangement, material will be diverted to Enrich Environmental, Newtown, Rathganley, Kilcock, Co. Meath (Waste Permit Number 2004/57).

Emergency Response Procedures will be agreed with the Agency, in terms of response to fires or other emergency situations.

A.18 Restoration and Aftercare

It is not envisaged that the activities at Esker Green Waste facility will have an adverse affect on the site, which will result in detailed aftercare management of the site being required. The Applicant will ensure that all environmental aspects relating to the aftercare of the site will be addressed as necessary. Post-closure environmental monitoring at the site will be agreed with the Environmental Protection Agency (EPA) after appropriate closure procedures have been put in place.

A.19 Control of Major Accident Hazards

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 does not apply to the proposed development.

A.20 Emission of List I/II Substances

Fuel will be appropriately stored on site. An oil interceptor is included in Proposed Layout drawings.

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