W0227-01
office

White Young Green

ENVIRONMENTAL PROTECTION AGENCY WASTE LICENSING
RECEIVED
25 OCT 2006
INITIALS.....

ENVIRONMENTAL PROTECTION AGENCY WASTE LICENSING
RECEIVED
2 OCT 2006
INITIALS.....

Noeleen Keavey,
Licensing Unit,
Office of Licensing and Guidance,
Environmental Protection Agency,
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford

Environmental

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

24th October 2006

Reg no.: W0227-01

Re: Notice in Accordance with Article 14(2) (b) (ii) of the Waste Management (Licencing) Regulations

Dear Ms. Keavey,

On the 16th March 2006, White Young Green Environmental (Ireland) ltd., Submitted a waste licence application on behalf of our client Lawlor Brothers Waste Disposal Ltd. trading as Access Skip Hire for the company's Recycling Centre at JFK Industrial Estate, JFK Road, Naas Road, Dublin 12. Subsequently, the Office of Licencing and Guidance issued a notice requesting further information in accordance with Article 14(2) (b) (ii) of the Waste Management (Licencing) Regulations. Please find enclosed one original and three hard copies of the Article 14 Response as well as sixteen copies of the information on CD ROM to clarify the issues raised in the Notice. I declare that the content of the hardcopy is identical to the electronic files provided.

Yours sincerely,

On behalf of Lawlor Brothers Waste Disposal Ltd. (Access Skip Hire)

Charlotte Greene

Charlotte Greene B.Sc. (Hons) Botany, M.Sc. Env., *Grad*CIWM

Environmental Scientist

Apex Business Centre, Blackthorn Road, Sandyford, Dublin 18
Tel: +353 1 293 1200 Fax: +353 1 293 1250 Email: enviro.dublin@wyg.com Website: www.wyg.com

White Young Green Environmental (Ireland) Limited
Registered in Republic of Ireland Number 387 419 Registered Office: Eastgate House, Lock Quay, Limerick VAT No. IE 6407419J
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

Lawlor Brothers Waste Disposal Ltd.
Trading as

Access Skips

WASTE LICENCE APPLICATION
–
ARTICLE 14 RESPONSE

For:

Waste Recycling Centre at
JFK Industrial Estate
JFK Road
Dublin 12

Prepared by:

White Young Green Environmental Ltd
Apex Building Centre
Blackthorn Road
Sandyford Industrial Estate
Dublin 18

TABLE OF CONTENTS

Section 1 – Article 14 Response

1. **Attachment 1 –** Planning Register Reference SD06A/0086
2. **Attachment 2 –** Non-Technical Summary

Section 2 – Revised Drawings

Drawing No. 02 – Existing Site Layout
Drawing No. 03 – Proposed Site Layout
Drawing No. 05 – Proposed New Warehouse Plans
Drawing No. 07 – Proposed Drainage Layout
Drawing No. 08 – Drainage Details Sheet 1

Section 3 – Revised EIS Non-Technical Summary

SECTION 1 – Article 14 Response

Article 14(2) (b) (ii) Response

Article 12 & 13 Compliance Requirements

1. **Submit a copy of Planning Register Reference SD06A/0086**

   Please find in attachment 1

2. **Submit a non-technical summary in accordance with Article 12(1) (u) of the Waste Management (Licensing) Regulations.**

   Please find in Attachment 2

3. **Table 3.4.6 of the EIS states that no electronic or electrical waste will be accepted at the facility, however, Table 3.4.1 specifies the acceptance of this waste category. Clarify the waste categories to be accepted on site and update the affected tables. Please note that WEEE (Waste Electrical and Electronic Equipment) was observed on site on the 28/06/06.**

   It is proposed to accept electrical wastes of white goods items on site. This will include fridges, cookers, freezers, kettles, toasters etc. It is not the intention of Access Skips to accept any electronic waste including computers, printers, scanners, TVs, circuit boards, etc. It is expected that the volumes of white goods accepted at the facility will be relatively small. The bulk of this waste will come from individuals skip hire where private individuals are clearing out a shed perhaps and often require the white goods item to be disposed of along with the other wastes. It is proposed to construct a designated bay inside the new waste processing building in which to store the white goods. These will simply be stored on site for onward transfer to appropriate recycling facilities.

   Please refer to the revised tables below which clarify the waste categories to be accepted on site.

Table 1 Waste Categories (Table 3.4.1 Revised)

EWC Code	Waste Classification	Description of Waste	Method of Recovery or Disposal
15 01 01 to 15 01 09	Waste Packaging	Paper, cardboard, plastic, wood, metal, composite, mixed, glass and textile packaging	Segregated to individual components. Residue landfilled.
1 601 03	End of life tyres	Tyres	Recycled at Crumb tyres.
16 02 14	Discarded electrical equipment	White goods, toasters, kettles etc.	Stored, bulked and exported to licenced

			recycling facilities.
17 0101 to 17 01 03 And 17 01 07	Concrete, bricks, tiles and ceramics	Wood, Metal, Plastic, Masonry, Stones, Bricks, Soil	Wood, metal, plastic segregated. Residue sent to C&D recovery facility.
17 02 01 to 17 02 03	Wood Glass and Plastic	Wood glass and plastic	Segregated for recycling
17 04 01 to 17 04 11 excluding 17 04 09 and 17 04 10	Metals including their alloys	Non hazardous contaminated metals	Segregated and recycled
170504	Clean soil and stones	Soils and stones	Screened, recovered.
17 06 02 and 17 06 04	Other insulation materials	Non-hazardous Insulation from C&D waste	As above
17 08 02	Gypsum based construction materials	Gypsum based construction materials	Segregated and recycled
17 09 04	Mixed clean construction and demolition wastes	Non hazardous clean mixed C&D waste materials	Segregated and recycled
20 01 00	Municipal Waste	Commercial & household waste	Recyclables removed, residual to landfill
20 01 01 and 20 01 02	Paper & Cardboard and glass	Mixed paper and cardboard and glass	Baled for recycling
20 01 03	Small Plastics	Plastic bottles, bags	Baled for recycling and/or disposal
20 01 04	Other Plastics	Film	Baled for recycling and/or disposal
20 01 05	Small Metals	Cans, metal packaging	Segregated for metal recycling
20 01 07	Wood	General wood waste	Segregated for wood recycling
20 01 08	Biodegradable kitchen and canteen waste	v. small quantities will be processed on site and will arrive as mixed municipal waste	Recovered where possible, residue landfilled.
20 01 21*	Fluorescent tubes	Fluorescent tubes	Segregated for recovery
20 01 28	Paint, inks, adhesives[1]	Paint, inks, adhesives	Segregated for recovery/disposal
20 01 36	Discarded electrical equipment	White Goods, fridges, freezers, cookers, toasters kettles etc. No computers, printers, TVs, scanners etc.	Segregated for recovery
20 01 38 to 20 01 40	Wood plastics and metals	Wood plastics and metals	Segregated and recycled. Residue landfilled.

20 02 01 to 20 02 03	Garden and park wastes	Green wastes comprising grass, leaves, trees, branches etc. V. small quantities expected.	Segregated and recovered
20 03 00	Other Municipal Wastes	Mixed municipal waste	Recovered where possible. Residue landfilled.
20 03 01	Mixed Municipal Waste	Mixed commercial and household waste	Recovered where possible. Residue landfilled.
20 03 07	Bulky Waste	Mattresses, furniture	Recovered where possible. Residue landfilled.

Table 2 Other Wastes (Table 3.4.6 Revised)

OTHER WASTES	Accepted	Additional Information
Gypsum based Construction Materials	Yes	Recycled/landfilled
Dried Paints, Dried varnish & Dried Lacquer	Yes	Landfilled
Foundry Sand & Spent Blasting Grit	No	
Glass	Yes	Recycled
Latex and Rubber Solutions	No	
Solid, Fully Polymerised Plastics	Yes	Recycled/landfilled
Solid Rubber (excluding tyres)	No	
Electronic and Electrical Waste	Electrical Waste	Only white goods. No electronic waste.
Waste from incineration or pyrolysis of municipal and similar commercial, industrial and institutional waste	No	
OTHER WASTES	**Accepted**	**Additional Information**
Tyres	Yes	Recycled
White Goods	Yes	Recycled (includes fridges, freezers, cookers, toasters, kettles etc.). No electronic equipment.

4. Submit details on the acceptance and storage arrangements for WEEE (Waste Electronic and Electrical Equipment)

All WEEE which enters onto the site will be appropriately stored in a designated storage bay area located in the main process building (Building No. 3). Once sorted, it will be shipped to a designated WEEE recycling centre as agreed upon by the agency. The only WEEE accepted at the site will include electrical white goods waste items including fridges, freezers, cookers, toasters, kettles etc. It is expected that there will be relatively small quantities of these received at the site over the course of a year. One of the main reasons for contractors accepting such small quantities of these wastes is to be able to provide the service to the public i.e. to be capable of dealing with the bulk of the wastes produced in an average household. No electronic items such as computers, scanners, TVs, printers etc will be accepted. Should these arrive unsolicited on site they will be segregated and placed in the waste quarantine area for subsequent removal and treatment/disposal at a licensed facility.

5. Correct and resubmit the EWC codes provided in Section 3.4.1 of the EIS

Please refer to Table 1 (Table 3.4.1 Revised) above for the correct EWC codes which are to be accepted at the facility.

6. Provide EWC Codes for all waste types accepted at the facility.

Please refer to Table 1 (Table 3.4.1 Revised) above for the all waste types accepted at the facility

7. Quantify the operations requirements for 24 hours day operations. Specify in particular;

a) Proposed hours of operation

b) Proposed hours of waste acceptance/handling

c) Any other relevant hours of operation expected.

Give summary details and an assessment of the impacts of the increased opening hours including any proposed mitigation measures.

The proposed facility operating hours are as follows; 24 hours a day, 7 days a week (with the exception of Bank Holidays). Waste loads will be accepted at the facility and segregated waste loads will be exported from the facility 24 hours a day. However, every effort will be made to reduce or eliminate truck movements during the morning and evening rush hours. Waste handling, processing and treatment will occur between the hours of 6am and 10pm.

The EIS describes the potential impacts, mitigation measures and likely significant effects on the environment from the site activities. This concludes that the existing and proposed developments at the site will not impact significantly on the environment.

The main reasons for there being little or no impact from the development include the following (briefly): The relatively small scale of activity; the location of the activity (i.e. in an industrial estate and not close to any residential or other environmentally sensitive area; site containment i.e. all activities on site will be carried out inside a completely contained building thus significantly reducing potential impacts on visual amenity, noise, dust, water quality etc.; the many mitigation measures included in the design to reduce emissions and potential impacts on the environment and many more.

The proposed development has been designed and engineered with many mitigation measures in place to eliminate/reduce potential impacts on the environment and this is reflected in the conclusions of the EIS. It is considered that given these circumstances and in particular the location (industrial area removed from residential areas) and design of the facility that there will be no significant impact on the environment irrespective of the hours of opening and operation (including for waste acceptance, waste processing and materials export). In addition, while the loading on the environment from the site activities will remain the same, however, by increasing the timeframe for the site activities the loading will be spread out over a larger timeframe and the quantum of impact per unit of time is significantly reduced (e.g. noise and dust will be generated at the facility for a longer timeframe, however, there will be less noise and dust generated per hour of operation). This has the effect of reducing potential impacts during any pinch points.

The hours of processing operations proposed (6am to 10pm) are not unusual in many modern industries/businesses where flexitime and shifts are encouraged to allow staff avoid extreme traffic conditions during the traditional rush hours. It is considered that allowing staff to avoid rush hour traffic and allowing waste acceptance over a 24 hour period will eliminate/reduce the need for trucks to travel during rush hours will have a small but positive impact on traffic during these times in the industrial estate.

8. Attachment C of the licence application states that the company employ c. 25 employees but section 3.4.2.2 of the EIS states that company currently employs a total of 18 staff. Please clarify

The original EIS was prepared for Access Skips by White Young Green in 2005. At the time of writing the number of staff employed at the facility was 18. Subsequently, the Waste Licence Application was submitted to the EPA and at that time the stated number of 25 employees was accurate. This staff growth is mainly due to the acquisition of a haulage fleet from Liam Slattery T/A A Argus Skip Hire.

From 13th October 2006 the total number of employees (excluding drivers) is at 28 as follows:

Administration	= 8
Accounts	= 2
Ground Staff	= 16[NOTE 1]
Maintenance	= 2

NOTE 1: Out of the 16 Ground Staff, there are 4 full time Plant Operators, 8 recycling operatives on the Picking Line and 4 General Operatives on the ground

9. Submit a revised site drainage plan. Illustrate the drainage from the roofs of Building Nos. 1 and 2 and the point of exit from the site of all storm water. Indicate the drainage systems for the wheel wash and the truck wash

Please refer to Map Drawing No. 07 attached

10. Submit a revised 'Existing Site Layout' drawing to reflect the actual site layout i.e. include the plant, tanks and storage areas, etc as observed on a recent site visit.

Please refer to Map Drawing 02 attached

11. Indicate on a revised 'Proposed Site Layout' drawing the proposed location of all plant, tank and storages areas etc.

Please refer to Map Drawing 03 attached

12. Provide details on the tanks illustrated in Drawing No. 01.

The tanks that are shown on Drawing 01 have been dismantled and removed off site. These were used for the storage of oil by the previous owners of the site. Access arranged for Atlas Oil Ltd. to empty the tanks and then had the tanks dismantled and removed.

13. Section 3.2.1.13 of the EIS states that construction and demolition (C&D) waste will be processed indoors in one of the facility buildings, however Section 3.6.3 states that processing of C&D waste will occur in the processing yard. Please clarify.

All C&D waste will be processed in the new main waste processing building (Building No. 3) when it is constructed. No C&D waste will be processed in the open. Building No. 1 may be used as a back up facility for the processing of C&D waste in the event of future maintenance in Building No. 3. It is likely that this will be a rare occurrence and Building No. 1 will be used in this fashion purely as a contingency arrangement.

All wastes are presently processed indoors in the existing Building Nos. 1 and 2. The vast bulk of C&D waste is processed in Building No. 2 and not in the open or on the open yard.

14. Section 3.6.3 indicated the use of roller shutter doors in Building No. 3. Confirm if doors are proposed for Building Nos. 1 & 2 and if so specify the design of said doors.

At present no doors are proposed for Building Nos. 1 & 2. It is proposed however to have roller shutter door on Building No. 3 once reconstructed. Access Skips are in the process of researching the different types of roller doors available on the market.

ATTACHMENT 1

Planning Register Reference SD06A/0086

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

White Young Green
Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18

NOTIFICATION OF DECISION TO GRANT PERMISSION
PLANNING AND DEVELOPMENT ACT 2000, &
PLANNING REGULATIONS THEREUNDER

Decision Order Number:	**0804**	**Date of Decision:**	21-Apr-2006
Register Reference:	SD06A/0086	**Date:**	27-Feb-2006

Applicant: Lawlor Brothers Waste Disposal Ltd

Development: Demolition of the existing building and construction of a new building in its place (1,693sq.m. as per existing building to be demolished). The redevelopment site together with their existing facility will be used for the recycling of dry non-hazardous commercial, industrial, construction, demolition and household waste at a rate of 95,000 tonnes per annum. The redevelopment works will also include for the installation of a wheel wash, a truck wash and an oil and fuel storage bund. The application is accompanied by an Enviromental Impact Statement. The proposed development requires a waste license.

Location: Lawlor Brothers Waste Disposal Limited, Unit 28, JFK Road, JFK Industrial Estate, Naas Road, Dublin 10

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

Floor Area:

Time extension(s) up to and including:

Additional Information Requested/Received: /06-Mar-2006

Clarification of Additional Information Requested/Received: / 06-Mar-2006

DECISION TO: Pursuant to the Planning & Development Act 2000, it is hereby decided, for the reasons set out in the First Schedule hereto, to **GRANT PERMISSION** for the said development in accordance with the said plans and particulars, subject to the conditions specified in the Second Schedule hereto, the reasons for the imposition of the said conditions being as set out in the said Second Schedule and the said permission is hereby GRANTED subject to the said conditions.

FIRST SCHEDULE

It is considered that the proposed development accords with the policies and objectives of South Dublin County Council, as set out in the South Dublin County Council Development Plan 2004-2010 and subject to the (15) condition(s) set out hereunder is thereby in accordance with the proper planning and sustainable development of the area.

SECOND SCHEDULE

Conditions and Reasons:

1. The development shall be carried out in its entirety in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the other conditions attached hereto.
   REASON: To ensure that the development shall be in accordance with the permission, and that effective control be maintained.

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

2. The water supply and drainage infrastructure, including the disposal of surface water, shall comply with the technical requirements of the Planning Authority. There shall be full and complete separation of foul and surface water systems.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

3. (a) All foul water from the proposed truck wash shall be routed via a silt trap and oil/diesel interceptor before being discharged to the foul drain.
(b) Foul water drawings for the proposed truck wash showing location of drains, manholes, Ajs etc. up to and including the point of connection to the existing foul drain shall be submitted for the written agreement of the Planning Authority prior to the commencement of development.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

4. All wastewater from commercial kitchens or food preparation areas shall be routed via an appropriate grease trap or grease removal system before being discharged to the public sewer.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

5. No discharge of trade effluent to sewer shall be permitted without the applicant first obtaining from the Environmental Services Department, a licence under Section 16 of the Water Pollution Acts 1977 - 1990.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

6. (a) All surface water runoff from the truck parking/ marshalling areas shall be routed via a silt trap and petrol/oil/diesel interceptor before discharging to the surface water sewer.
(b) Plans showing isolation of roof surface water runoff from the building from that of the yard/ parking area and off-loading areas shall be submitted to the Planning Authority prior to the commencement of development.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

7. All drums of oil, chemicals or potential polluting matter shall be stored within a liquid retaining concrete structure, such that in the event of a leak or spill from any part of the drums, the contents will be contained within the bunded structure
REASON: In the interests of public health.

8. Prior to commencement of development the applicant/ developer shall consult the Environmental Services Department of South Dublin County Council in regard to specific technical requirements for the proposal, and submit technical details for compliance.
REASON: In the interests of public health and in order to ensure adequate drainage provision.

9. The area between the building and roads must not be used for the storage of waste or display purposes at any time.
REASON: In the interest of amenity.

10. The storage facilities at the premises shall be properly secure.
REASON: In the interest of amenity.

11. The lighting system shall be cowled and designed to minimise potential pollution from glare and light spillage.
REASON: In the interests of proper planning and sustainable development.

12. No advertising sign(s) or structure(s) shall be erected except those, which are exempted development, without the prior approval of the Planning Authority or An Bord Pleanala on appeal.
REASON: In the interest of the proper planning and development of the area.

13. During the construction and operation of the development, Best Practicable Means shall be employed to minimise air blown dust emitted from this site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas and any other precautions necessary to prevent dust nuisances. There must be compliance with British Standard B.S. 5228 Noise Control on

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

Construction and Open sites.
REASON: To protect the amenities of the area and to prevent a nuisance being caused to occupiers of buildings in the vicinity.

14. All necessary measures shall be taken by the contractor to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works.
REASON: To protect the amenities of the area and to prevent a nuisance being caused to occupiers of buildings in the vicinity.

15. The developer shall pay the sum of €142,364.37 (one hundred and forty two thousand three hundred and sixty four euro and thirty seven cent) (updated at the time of payment in accordance with changes in the Tender Price Index) to South Dublin County Council as a contribution towards expenditure in respect of public infrastructure and facilities benefiting development in the area of the planning authority and that is provided, or that it is intended will be provided, by or on behalf of the County Council as provided for in the Contribution Scheme for the County made by the Council. This contribution to be paid before the commencement of development on the site.
REASON: The provision of such facilities will facilitate the proposed development. It is considered reasonable that the payment of a contribution be required, in respect of public infrastructure and facilities benefiting development in the area of the planning authority and that is provided, or that is intended will be provided, by or on behalf of the Local Authority.

Note 1: The applicant/developer is advised that under the provisions of Section 34 (13) of the Planning and Development Act 2000 a person shall not be entitled solely by reason of a permission to carry out any development.

Note 2: The applicant/developer is advised that in the event of encroachment or oversailing of adjoining property, the consent of the adjoining property owner is required.

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CHONTAE ÁTHA CLIATH THEAS

Halla an Chontae,
Lár an Bhaile, Tamhlacht,
Baile Átha Cliath 24.

Telefon: 01-414 9000
Facs: 01-414 9104

PLANNING
DEPARTMENT
County Hall,
Town Centre, Tallaght,
Dublin 24.

Telephone: 01-414 9000
Fax: 01-414 9104
E-Mail: planning.dept@sdublincoco.ie

Signed on behalf of the South Dublin County Council.

24-Apr-2006

for **Senior Executive Officer**

ATTACHMENT 2

Non Technical Summary

Attachment 2- Non Technical Summary

As required by Article 12 (1) (u) of the Waste Management (licensing) Regulations, 2004 a non technical summary is provided below which contains information on the matters listed in articles 12(1)(a) to (t) of the regulations.

A.1 Nature of the Facility

This section relates to Article 12(1)(a to e)

Lawler Brothers Waste Disposal Ltd (LBWDL), unit 28, JFK Road, JFK Industrial Estate, Naas Road, Dublin 12 (Grid Reference: 3096E: 2320N) operates a waste management recycling centre at the same address. LBWDL operates under the trading name of Access Skips (Tel: 01 4500830; Fax: 01 4500835). The facility is primarily used as a recycling centre for commercial, construction and demolition waste. LBWDL provides a progressive service in terms of waste management to the population of the Dublin area. The Company has provided a waste disposal service to Dublin for over 10 years. The LBWDL facility currently handles an estimated 15,800 tonnes per annum of non-hazardous waste and operates under a waste permit granted by South Dublin County Council. The waste is delivered to the facility where recyclables such as steel, wood, paper, plastics, soils and hardcore are segregated out and the residual non-recyclable waste is bulked up and transferred to landfill.

The Company is now confident that it can expand its business and operations and is now applying to the Environmental Protection Agency (EPA) for a Licence to process 95,000 tonnes of waste in 2008 at the JFK facility. The expansion will allow a larger increase in the volumes of waste to be recycled at the facility.

LBWDL was granted planning permission (Reg. Ref. No. S02A/0136) to operate the existing facility in May 2002 by South Dublin County Council . LBWDL acquired the premises next door and were recently granted planning permission to demolish the existing building on that site and replace it with a purpose built waste processing building (Planning ref: SD06A/0086).

The existing site covers an area of 0.444 hectares. The site is located in the JFK Industrial Estate on the western side of Dublin City in the townland of Fox and Geese. This area lies within the local authority jurisdiction of South Dublin County Council, PO Box 4122, Town Centre, Tallaght, Dublin 24 who are also the relevant sanitary authority.

The Cammock River flows in an easterly direction approximately 250 m west of the site and 350m south of the Grand Canal, linking Dublin with the River Shannon. The industrial estate is bounded to the south by the N7 Dublin to Cork road and to the west by the M50 motorway. Other major roads in the area include Killeen Road to the west and Nangor road to the south west.

Surrounding activity is primarily industrial and commercial, as would be expected in an industrial estate. A number of office units are contained in JFK Industrial Estate representing 15% of industry in the estate. Other adjacent activities generally consist of warehouses with small office units and retail units.

The facility design, operation and management is fully described in Section 3 of the Main Text of the EIS that accompanies this Waste Licence Application, and on Figures and Drawings that are enclosed. Any correspondence in relation to this application should be addressed to White Young Green Environmental (Ireland) Ltd., Apex Business Centre, Blackthorn Road, Sandyford, Dublin 18.

A.2 Classes of Activity

This section relates to Article 12(1)(f)

In accordance with the Third and Fourth Schedules of the Waste Management Act, 1996 (WMA, 1996) the following classes of activity will be carried out on the site:

Third Schedule-Waste Disposal Activities:

11. *Blending or Mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.*

12. *Repackaging prior to submission to any activity referred to in a preceding paragraph of this schedule.*

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.*

Fourth Schedule-Waste Recovery Activities:

2. *Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological processes) – This is the Principal activity.*

3. *Recycling or reclamation of metals and metal compounds.*

4. *Recycling or reclamation of other inorganic materials.*

13. *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.*

A.3 Quantity and Nature of the Waste to be Disposed

This section relates to Article 12(1)(g)

It is proposed that the maximum amount of waste processed at the facility will be 95,000 tonnes of waste per year. It is expected to recycle up to 75% of the total material processed. The most common wastes to be accepted and processed at the facility will include paper, cardboard, plastics, C&D wastes of soils, concrete, bricks, blocks, some municipal waste, metals and wood. Hazardous waste will not be accepted at the facility. Some small quantities of white goods will be accepted. The European Waste Catalogue codes for the wastes to be treated at the facility are given in Table 3.4.1 (revised) of the EIS. The specific codes are given and are derived from the general chapter codes as follows 15 (Waste packaging), 16 (Wastes not otherwise specified in the list), 17 (C&D Wastes) and 20 (Municipal wastes).

A.4 Raw and Ancillary Materials, Substances, Preparations used on the Site

This section relates to Article 12(1)(h)

The main raw materials used on site are diesel, mains water and electricity. Minor amounts of engine oil and hydraulic oil are used in the day-to-day operation of the facility. The quantities are provided in Section 3.5 of the EIS.

A.5 Plant Operating Procedures

This section relates to Article 12(1)(i)

The facility will be open to the receiving of waste 24 hours a day and 7 days a week. Wastes will only be processed at the facility between the hours of 6am and 10 pm. The Company employs a total of 28 full time staff.

Plant currently used at the facility include;

- 1 No. CAT 938 Front End Loader
- 1 No. Sumitons Excavator and grab.
- 40 No. Skips (approx)
- 1 No. CAT 320 Excavator
- Screen
- Hand picking station

Additional proposed plant includes:

- 1 No. Forklift
- 1 No. REL Volvo
- 1 No. Mann Skip Loader
- 5 No. Iveco Skip Loaders
- 1 No. Cardboard Baler
- 1 No. Shredder
- Recycling plant including screen, magnet, non ferrous metals separator, ballistic separator and hand picking station
- 1 No. Vehicle Washer

Waste processing operations on site are currently carried out in the existing waste transfer building (building 2). It is proposed that once the new processing building (building 3) is constructed that all wastes will be processed inside this building. In summary, wastes will be brought into the building and deposited on the floor in the designated tipping area. The waste will be inspected fully and any unacceptable wastes will be moved to the waste inspection area or the waste quarantine area for detailed inspection and removal off site to a suitably licensed facility if necessary. Suitable wastes will be processed as follows: The larger fractions such as large pieces of metals and wood will be removed from the waste by grab machine or by hand. The remaining waste will be loaded into the screen and the fines screened out, metals will be removed by magnet, non-ferrous metals removed by eddy current separator, lighter fragments of paper and plastics removed in the ballistic separator and various components of waste will be segregated on the hand picking line in the hand picking station. The segregated wastes will be stored in dedicated bays for wood, metals, soils, fines, plastics, paper/card etc. The wastes will be baled or compacted and bulked up prior to export off site to suitable facilities for further recycling.

The Company will agree all processes and engineering works in advance with the EPA.

The site will be operated and monitored in accordance with conditions issued by the EPA and specified in any Waste Licence that may issue. Regular environmental monitoring will be carried out and an annual status report will be prepared and submitted to the EPA.

A.6 Emissions

This section relates to Article 12(1)(k)

The potential emissions from the facility are divided into emissions to air, groundwater, surface water and noise emissions.

Emissions to Air

See Section 3.7.1 of the EIS

Emissions to Groundwater

See Section 3.7.2 of the EIS

Emissions to Surface Water

See Section 3.7.3 of the EIS

Noise Emissions

See Section 3.7.4 of the EIS

A.7 Assessment of the Effects of Emissions on the Environment

This section relates to Article 12(1)(l)

The EIS describes the potential impacts, mitigation measures and likely significant effects on the environment from the site activities including activity related emissions. This concludes that the existing and proposed developments at the site will not impact significantly on the environment. The main reasons for there being little or no impact from the development include the following (briefly): The relatively small scale of activity; the location of the activity (i.e. in an industrial estate and not close to any large residential or other environmentally sensitive area; site containment i.e. all activities on site will be carried out inside a completely contained building thus significantly reducing potential impacts on visual amenity, noise, dust, water quality etc.; the many mitigation measures included in the design to reduce emissions and potential impacts on the environment and many more. The proposed development has been designed and engineered with many mitigation measures in place to eliminate or reduce potential impacts on the environment and this is reflected in the conclusions of the EIS. It is considered that given these circumstances and in particular the location (industrial area removed from residential areas) and design of the facility that there will be no significant impact on the environment.

A.8 Information related to Section 40(4) (a) to (g) of the Act

This section relates to Article 12(1) (j)

A.8.1 Compliance with Emissions

Dust

There are no National or EU standards for dust deposition. By law the plant will be required to be in compliance with Air Pollution Act, 1987. The dust levels measured at the site were below the EPA recommendation of 350 mg/m^2/day.

Odours

Odours from the site have not been a problem in the past. For this reason it is not considered necessary to monitor odours at the site. There are no National or EU standards for odour emissions. In the event of receiving complaints from neighbouring premises with regard to odours, details will be taken on a complaint form and appropriate remedial action will be taken to reduce odour emissions and this action will have regard to the principles of BAT.

Noise

There are no legal limits currently in place for noise emissions from industry. The EPA have set day-time and nightime guideline limits of LAeq of 55 dB(A) and 45 dB(A) respectively at sensitive locations at other

waste management facilities that have been licensed. As stated in Section 2.3 of the EIS, noise levels were above the EPA guidelines at noise monitoring locations, however, these exceedances are due mainly to traffic related noise, noise from other activities in the industrial estate as well as partly due to site activities. Mitigation measures proposed will ensure no significant impact on the local noise environment from the proposed development.

Water

The risk to the groundwater posed by the activities at the site is considered insignificant and no groundwater monitoring is proposed.

A new surface water drainage system is proposed for the site. This will include for the treatment of all yard drainage in a silt trap and oil interceptor prior to discharge to the mains storm water drain serving the industrial estate. The composition of this discharge will be sampled and analysed on a regular basis to ensure that the quality of surface water in the area is not impaired.

A.8.2 Environmental Pollution

The design and operating practices that ensures that environmental pollution is avoided are listed below.

Risk to Waters is avoided by:

- All hydrocarbon tanks are bunded
- All wastes will be handled and stored inside the new waste processing building. The building is fully contained with roof, concrete floor and lower walls of concrete. An internal leachate drainage and collection system will be installed in the new Building 3.
- A proposed new surface water collection, drainage and treatment system including silt trap and oil interceptor will be installed at the site.
- All hardstanding areas are, and will be, concreted.

Risk to the Atmosphere is avoided by:

- All wastes will be treated inside the new enclosed waste processing building.
- The vast bulk of the wastes are dry, non hazardous solid wastes.
- A dust suppression system will be employed in the building consisting of a spray mist air system. This will be augmented by individual spray systems at the main dust producing parts of the plant such as the screen and the shredder. There will also be a negative air pressure system employed in the Hand picking station.
- The retention time of waste at the site is insufficient to allow formation of decomposition gases.

Risk to Land, Soil, Plants or Animals is avoided by:

- Risk to land and soil beneath the site is avoided by the same controls that avoid risk to Waters as described above.

- Risk to plants and animals is avoided by location of the development removed from areas of special ecological importance. The flora and fauna in the vicinity of the site are not considered sensitive to the site activities.

Nuisance through Noise, Odours or Litter is avoided by:

- All wastes will be handled inside a contained building and all vehicles carrying wastes to the site will be covered.

- Daily litter patrols are, and will be, carried out at the site.

These pollution control measures will also have the effect of reducing the nuisance of dust emissions from the site.

Adverse effects on the country side or places of interest are avoided by:

- Operating the site with adequate environmental controls.
- The facility is located in an industrial estate at a remove from the countryside and any places of interest.

The activity concerned does not entail the landfill of waste.

A.8.3 - Best Available Technology Not Entailing Excessive Cost

With respect to the LBWDL the principal of employing BATNEEC is being applied in respect to emissions as follows.

LBWDL has and will employ modern management practices and continue to commit financial resources in order to control all nuisance emissions and ensure protection of the environment. The existing modern management practices includes transporting waste within covered vehicles, regularly cleaning site roads and other surfaces and regularly patrolling for litter.

The company intend to purchase and install state of the art recycling equipment in the newly constructed main processing building (Building 3). The equipment will include a shredder, screen, magnet, ballistic separator, conveyors and handpicking station among other items. This will augment the existing plant such

as loading shovel, baler, compactor and the ancillary infrastructure including truck wash, wheelwash, weighbridge, silt trap, oil interceptor, dust suppression systems etc. and are examples of the best available technology used in modern recycling centres.

Specialist consultants have and will be retained as required to monitor potential nuisances and all relevant environmental media as may be set out by the EPA. The consultants will inform the company on a regular basis of improvements in pollution abatement or other relevant technology. The costs of the facility and adhering to the modern management practices are paid for out of LBWDL's annual revenues.

The proposed recycling activity is consistent with the policies, aspirations and objectives of the Waste Management Plan for the Dublin region.

A.8.4 Fit and Proper Person

The applicants are fit and proper persons to hold and operate a waste licence. As stated in Section L.2, no employee of LBWDL has been convicted of an offence under the Waste Management Act 1996 or other prescribed acts under this section.

As outlined in Section L.2, the management team at Access Skips have been operating a waste management company for many years and have abundant experience in this area. The general manager will be responsible for environmental aspects of the operation and compliance with the waste licence. He will be assisted by an environmental technician.

A.8.5 Financial Provision

Financial commitments may be required to cover decommissioning, aftercare management and environmental pollution. The Company's sound financial position and its ability to cover the cost of environmental issues at the site are outlined in Section L.2.

A.8.6 Energy Usage

Energy will be used efficiently at the facility. It is proposed to carry out an energy audit after the site is fully operational and this will help in controlling energy usage at the site.

A.8.7 Noise Emissions

Noise emissions from the facility will comply with all noise regulations under section 106 of the Act of 1992.

A.9 Monitoring and Sampling Points

This section relates to Article 12(1)(m)

The proposed monitoring programme is as follows:

Dust	-three times a year (twice in summer and once in winter)
Noise	-annually
Surface Water Discharge	-quarterly
Foul Water Discharge	-quarterly

It is suggested that the monitoring locations swill be as designated by the EPA in the waste licence should it be granted.

A.10 Site Generated Wastes

This section relates to Article 12(1) (n)

Wastes generated by the activity itself will be minimised The company will prevent the generation of wastes by ordering supplies in bulk to reduce packaging, by not over-ordering and using take back schemes where applicable. The facility itself will provide state of the art recycling methods for any wastes produced on site. All residual wastes that cannot be recycled will be disposed of at licensed landfill sites.

A.11 Off-site Treatment or Disposal of Wastes

This section relates to Article 12(1) (o)

Liquid wastes are not treated at the facility. The bulk of the wastes treated at the facility will be segregated into individual types. These will then be forwarded on to other recycling facilities for further recycling. Residual wastes will be bulked up and transported off site to licensed landfills. The further treatment/disposal of the different types of waste is given in tables 3.4.1 (revised) of the EIS.

A.12 Emergency Procedures to prevent Unexpected Emissions

This section relates to Article 12(1)(p)

Measures outlining procedures to be taken in the event of emergencies are outlined in Section 3.10 of the EIS.

In the event of unexpected contaminated water emissions, the surface and foul water discharge pipes will be closed off at the boundary of the site.

A.13 Closure, Restoration and Aftercare of the Site

This section relates to article 12(l)(q)

Operations at the facility are ongoing with an open ended life span and to date a closure plan has not been developed. In the event of the closure of the facility a closure plan will be developed as outlined in Section 3.9 of the EIS.

A.14 In the case of an application for the Landfilling of waste

This section relates to article 12(l)(r)

This application does not relate to the landfilling of waste

A.15 Control of Major Accident Hazards Involving Dangerous Substances Regulations

This section relates to article 12(l)(s)

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2000 (S.I. No. 476 of 2000) do not apply to this activity.

A.16 Activities giving rise to an emission to an aquifer of List I or List II substyances

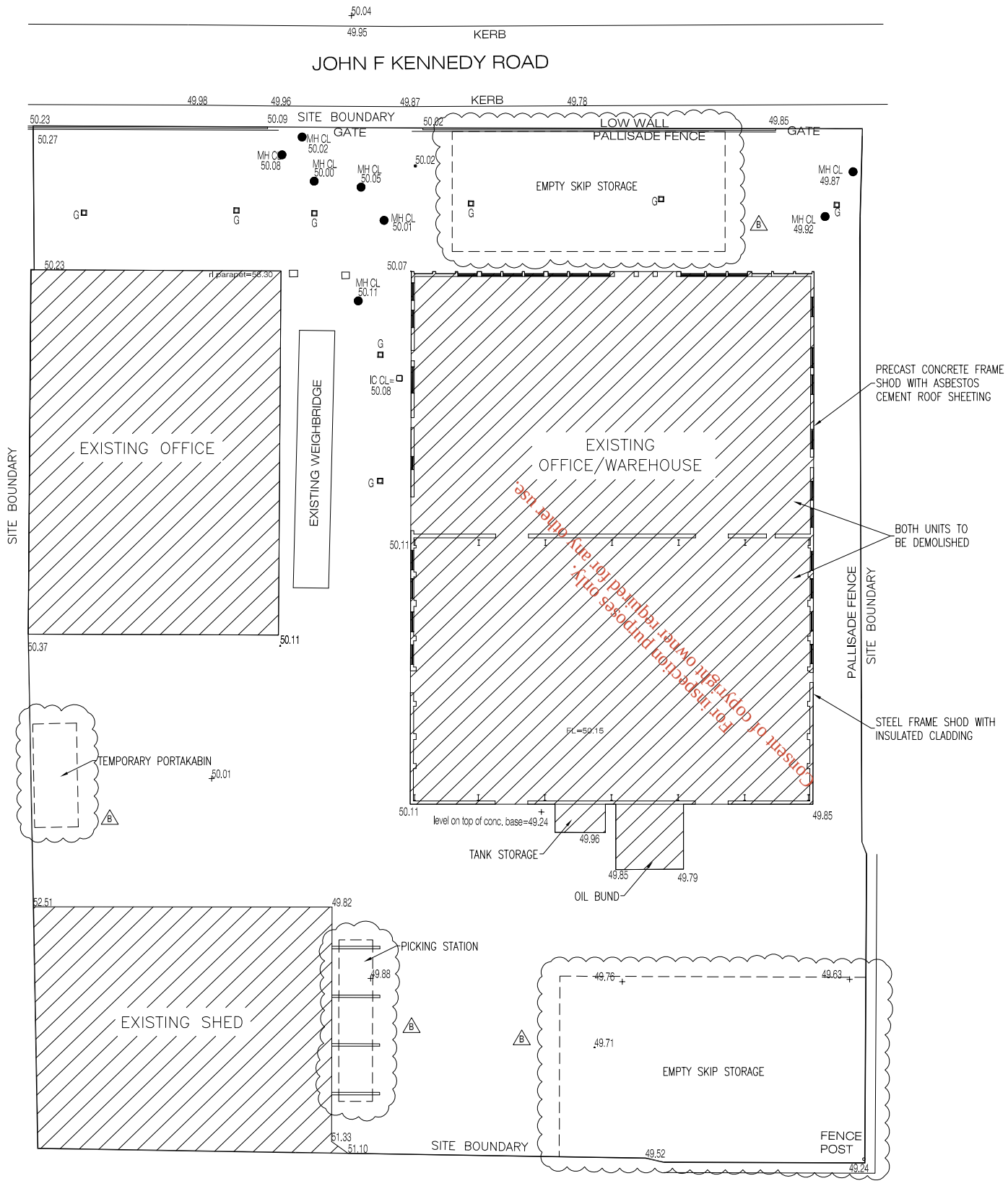
This section relates to article 12(l) (t)

The activity will not give rise to the emission of any contaminants including List I and List II substances to an aquifer.

SECTION 2

-

Revised Drawings



EXISTING SITE LAYOUT
1:250 SCALE

Rev	Description	By	Chk	App	Date
B	REVISED AS CLOUDED	SM	DB	DB	23/10/06
A	ISSUED FOR CONSTRUCTION	LK	DB	DB	24/08/06
T1	ISSUED FOR TENDER	JG	DB	DB	29/05/06

LAWLOR BROS.

Engineering
Management
Environmental
Planning

Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18
Tel: 00353 1293 1200
Fax: 00353 1293 1250

www.wyg.com
e-mail: dublin@wyg.com

White Young Green
Consulting

Project:

ACCESS WASTE NEW SORTING FACILITY

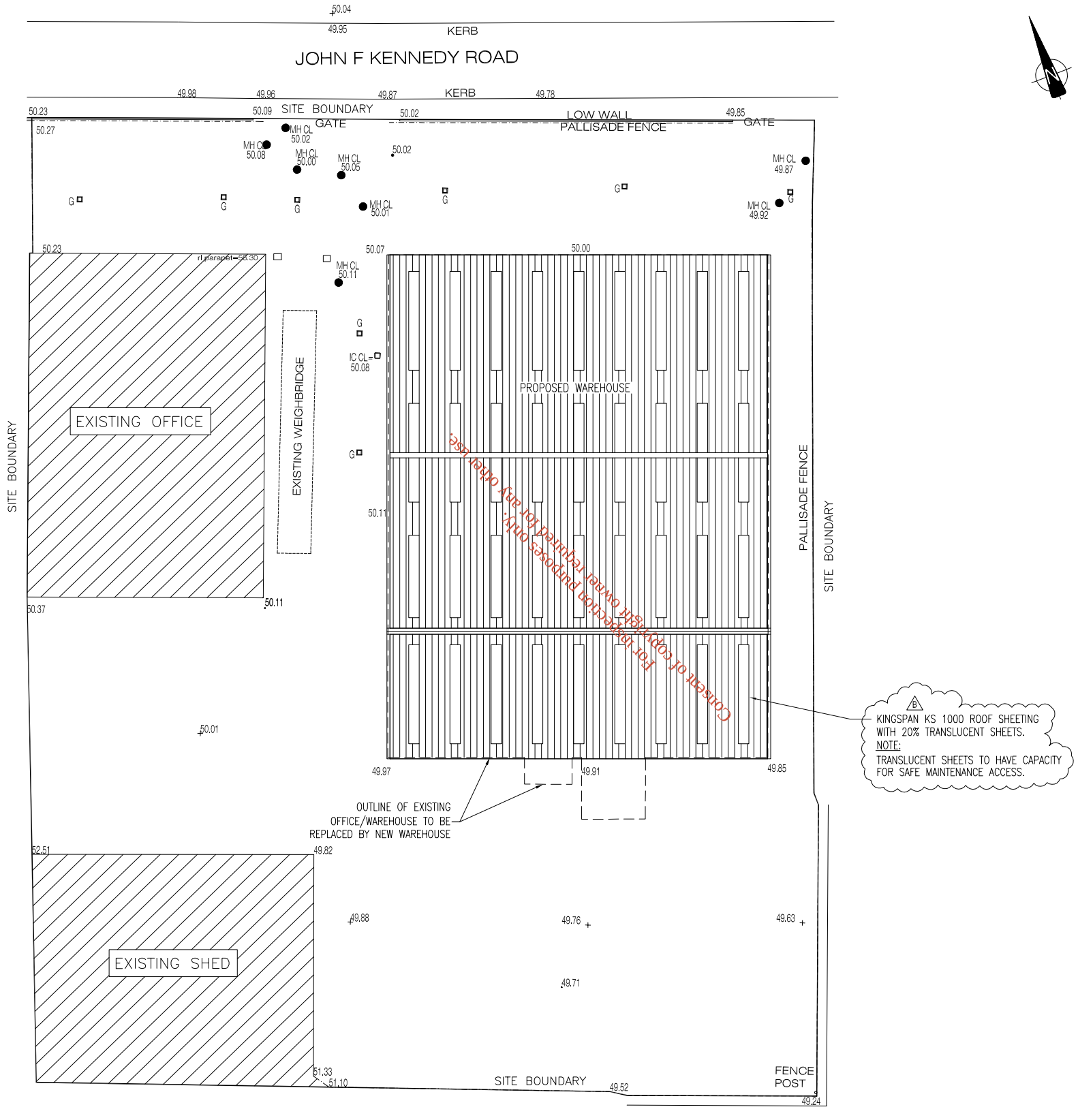
Drawing Title:

EXISTING SITE LAYOUT

Scale at A1	Drawn By	Date	Checked By	Date	Approved By	Date
1:250	LK	June'05	DB	June'05	DB	June'05

Project No.	Office	Type	Drawing No.	Revision
C003787	11	C&S	02	B

APPROVAL ☐ INFORMATION ☐ TENDER ☐ CONTRACT ☐ CONSTRUCTION ☒



PROPOSED SITE LAYOUT
1:250 SCALE

B	20% TRANSLUCENT SHEETING – AS SHOWN	JG	DB	DB	14/09/06
A	ISSUED FOR CONSTRUCTION	LK	DB	DB	24/08/06
T1	ISSUED FOR TENDER	JG	DB	DB	29/05/06
Rev	Descrfptlon	By	Chk	App	Date

LAWLOR BROS.

Engineering
Management
Environmental
Planning

Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18
Tel: 00353 1293 1200
Fax: 00353 1293 1250

www.wyg.com
e-mail: dublin@wyg.com

White Young Green
Consulting

Project:

ACCESS WASTE NEW SORTING FACILITY

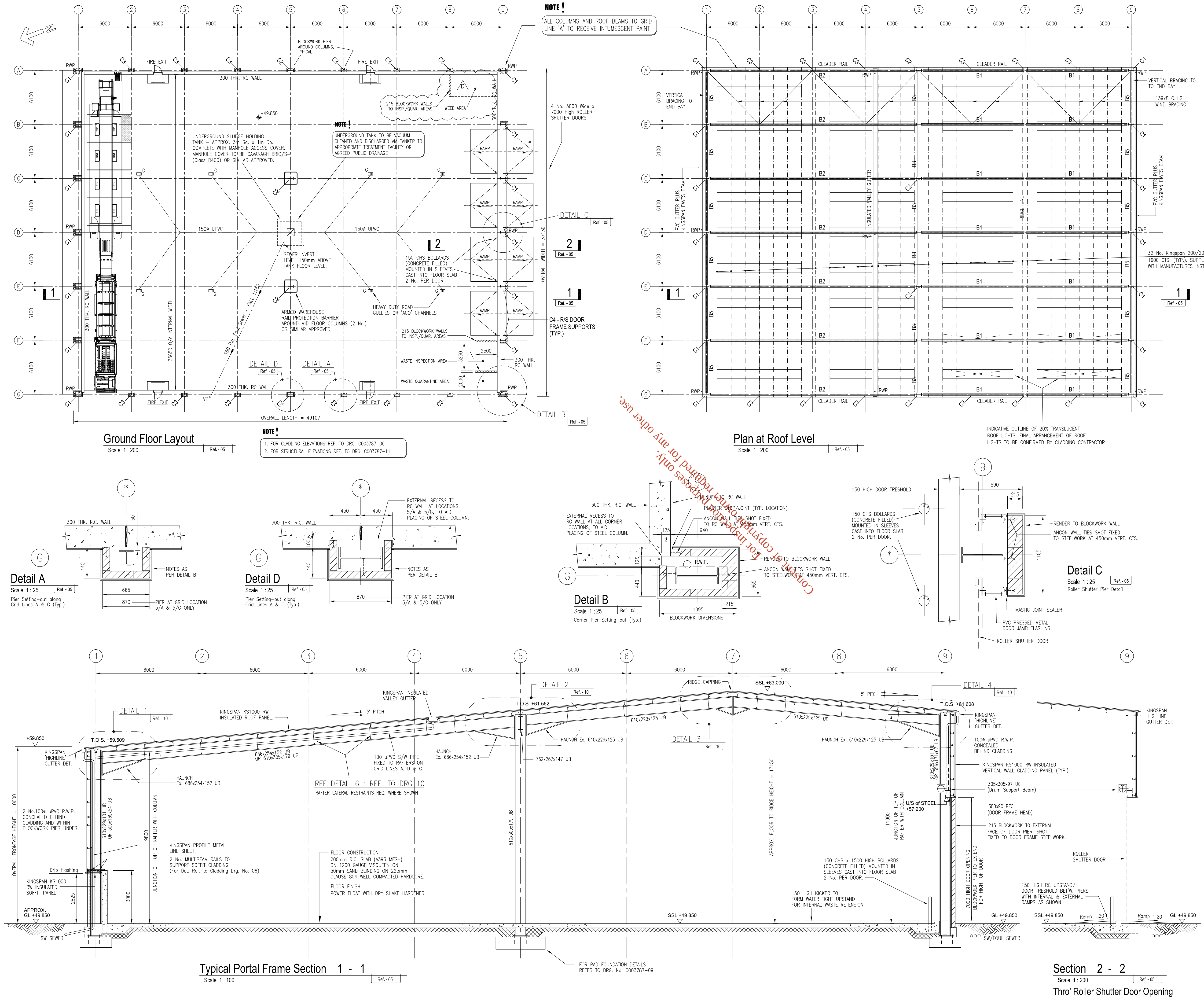
Drawing Title:

PROPOSED SITE LAYOUT

Scale at A1	Drawn By	Date	Checked By	Date	Approved By	Date
1:250	LK	June'05	DB	June'05	DB	June'05

Project No.	Office	Type	Drawing No.	Revision
C003787	11	C&S	03	B

APPROVAL ☐ INFORMATION ☐ TENDER ☐ CONTRACT ☐ CONSTRUCTION ☒



DO NOT SCALE: Contractor to check all dimensions and report any omissions or errors

NOTES

1. THIS DRAWING IS TO READ IN CONJUNCTION WITH ALL RELEVANT DRAWINGS AND SPECIFICATIONS.
2. DO NOT SCALE USE FIGURED DIMENSIONS ONLY – IF IN DOUBT ASK.
3. ALL STRUCTURAL STEELWORK TO BE IN ACCORDANCE WITH BS5950.
4. ALL STRUCTURAL CONCRETE TO BE IN ACCORDANCE WITH BS8110.
5. IT IS THE CONTRACTOR'S RESPONSIBILITY TO VERIFY ALL SITE DIMENSIONS AND LEVELS REQUIRED PRIOR TO COMMENCEMENT OF CONSTRUCTION OR PRODUCTION OF FABRICATION DRAWINGS.
6. KINGSPAN ROOFING & CLADDING TO BE SUPPLIED AND FIXED IN ACCORDANCE WITH MANUFACTURES INSTRUCTION & SPECIFICATIONS
7. KINGSPAN ROOF PURLINS & CLADDING RAILS TO BE SUPPLIED AND FIXED IN ACCORDANCE WITH MANUFACTURES INSTRUCTION & SPECIFICATIONS

Steelwork Legend:

C1	610x229x101 UB	Portal Frame Column
C2	610x305x179 UB	Portal Frame Column
C3	203x203x46 UC	Gable Wind Posts
C4	300x90x41 PFC	Roller Shutter Door Jamp Supports
B1	610x229x125 UB	Portal Frame Rafter
B2	686x254x152 UB	Portal Frame Rafter
B3	762x267x147 UB	Portal Frame Support Beam
B4	300x90x41 PFC	Roller Shutter Door Head Supports
B5	203x133x25 UB	Eaves Beam
B6	305x305x97 UC	Eaves Beam
WB1	139x8 CHS	Wind Bracing

Note : All Steel to be Grade S275 – Unless Noted Otherwize

Rev	Description	By	Chk	App	Date
D	REVISED AS SHOWN	SM	DB	DB	23/10/06
C	REVISED AS SHOWN	J.G	DB	DB	14/09/06
B	PADS SIZES ALTERED	T.F	DB	DB	01/09/06
A	ISSUED FOR CONSTRUCTION	LK	DB	DB	24/08/06
T1	ISSUED FOR TENDER	JC	DB	DB	29/05/06

LAWLOR BROS.

Engineering
Management
Environmental
Planning

Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18
Tel: 00353 1293 1200
Fax: 00353 1293 1250
www.wyg.com
e-mail: dublin@wyg.com

White Young Green
Consulting

Project:

ACCESS WASTE NEW SORTING FACILITY

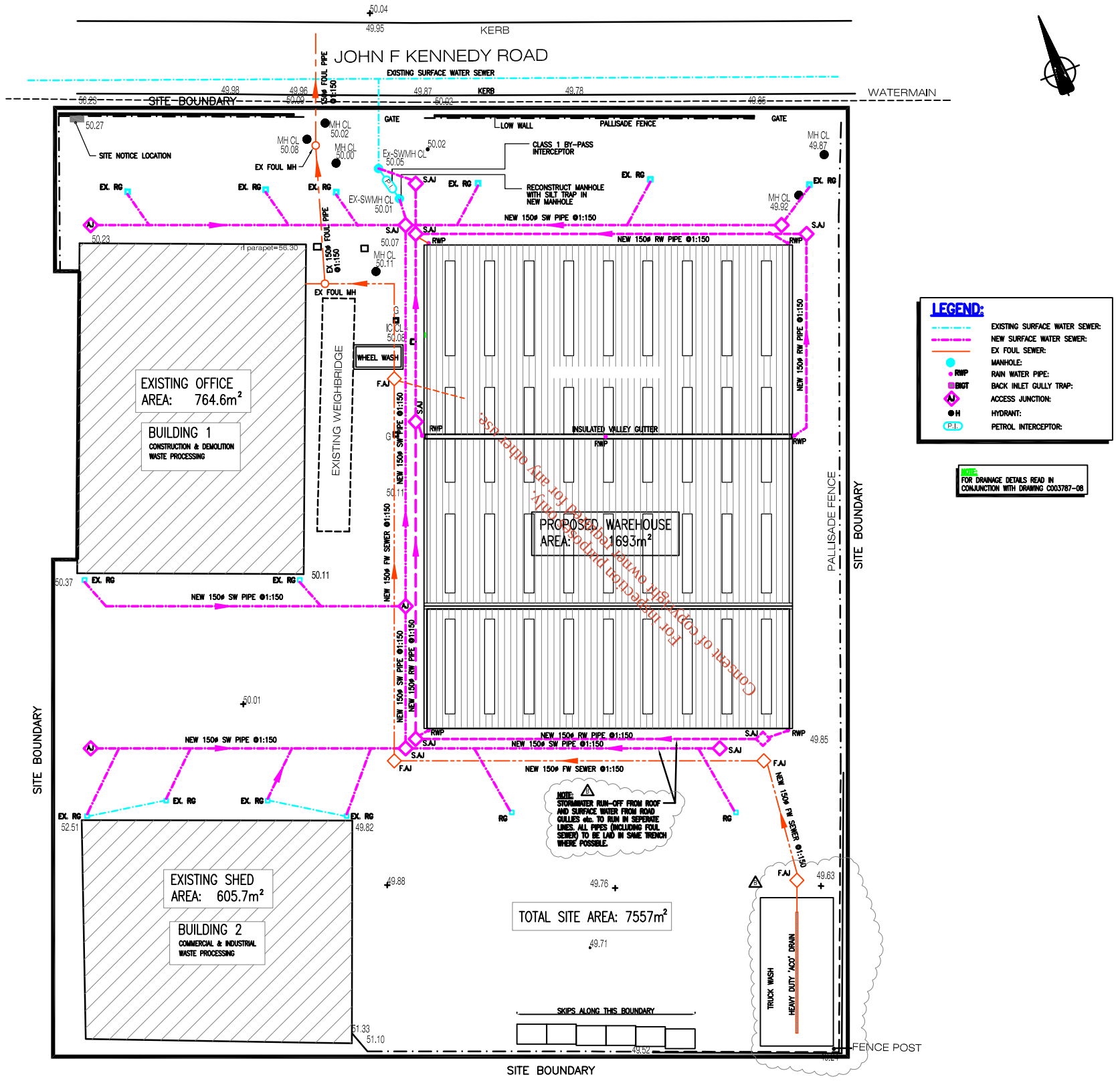
Drawing Title:

PROPOSED NEW WARE HOUSE PLANS AND SECTION

Scale at A1	Drawn By	Date	Checked By	Date	Approved By	Date
1:200 1:100	LK	June'05	DB	June'05	DB	June'05

Project No.	Office	Type	Drawing No.	Revision
C003787	11	C&S	05	D

APPROVAL ☐ INFORMATION ☐ TENDER ☐ CONTRACT ☐ CONSTRUCTION ☒



LEGEND:

- EXISTING SURFACE WATER SEWER:
- NEW SURFACE WATER SEWER:
- EX FOUL SEWER:
- MANHOLE:
- RWP RAIN WATER PIPE:
- BIGT BACK INLET GULLY TRAP:
- AJ ACCESS JUNCTION:
- H HYDRANT:
- P.I. PETROL INTERCEPTOR:

NOTE: FOR DRAINAGE DETAILS READ IN CONJUNCTION WITH DRAWING C003787-08

Rev	Description	By	Chk	App	Date
B	REVISED AS SHOWN	JC	DB	DB	14/09/06
A	ISSUED FOR CONSTRUCTION	LK	DB	DB	24/08/06
T1	ISSUED FOR TENDER	JC	DB	DB	29/05/06

LAWLOR BROS.

Engineering
Management
Environmental
Planning

Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18
Tel: 00353 1293 1200
Fax: 00353 1293 1250

www.wyg.com
e-mail: dublin@wyg.com

White Young Green
Consulting

Project:

ACCESS WASTE NEW SORTING FACILITY

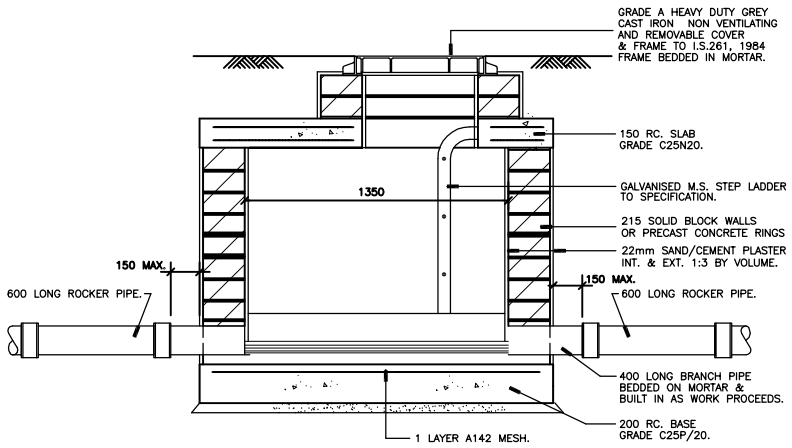
Drawing Title:

PROPOSED DRAINAGE LAYOUT

Scale at A1	Drawn By	Date	Checked By	Date	Approved By	Date
1:250	LK	June'05	DB	June'05	DB	June'05

Project No.	Office	Type	Drawing No.	Revision
C003787	11	C&S	07	B

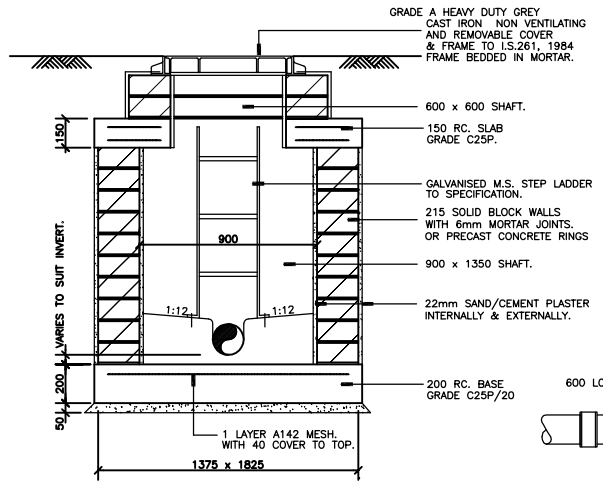
APPROVAL ☐ INFORMATION ☐ TENDER ☐ CONTRACT ☐ CONSTRUCTION ☒



TYPICAL SECTION THRO'

SOLID BLOCK MANHOLE. SCALE 1:20.

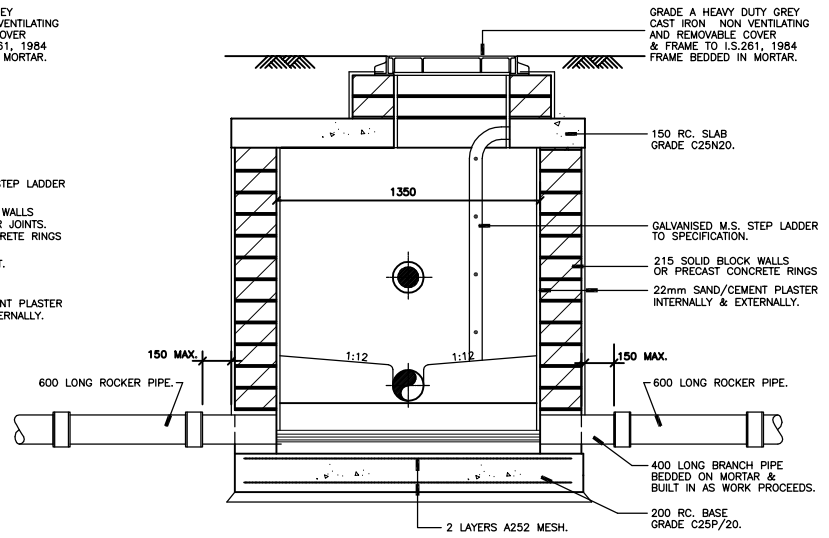
DEPTH GREATER THAN 1m & LESS THAN 2.7m TO INVERT OF PIPE.



TYPICAL SECTION THRO'

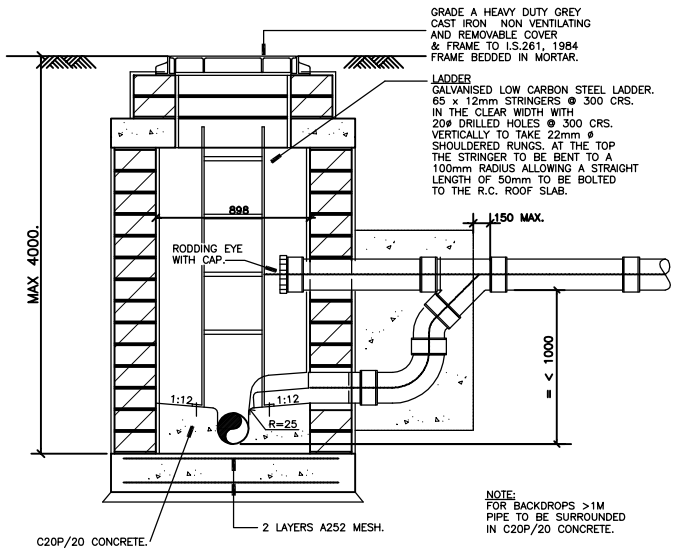
SOLID BLOCK MANHOLE. SCALE 1:20.

DEPTH GREATER THAN 1m & LESS THAN 2.7m TO INVERT OF PIPE.



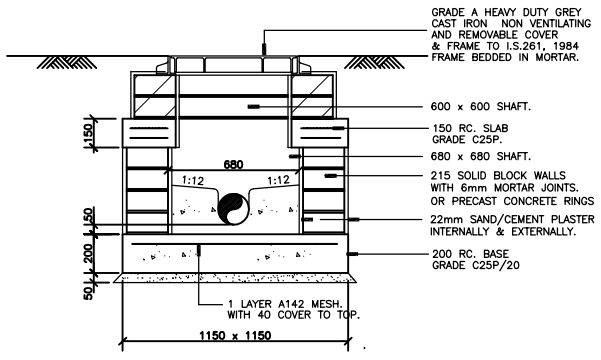
TYPICAL SECTION THRO'

BACK DROP MANHOLE. SCALE 1:20.



TYPICAL SECTION THRO'

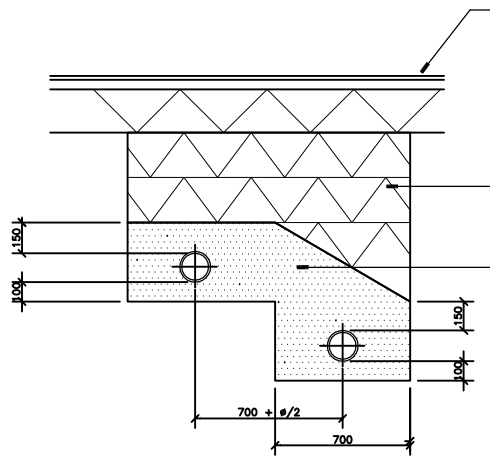
BACK DROP MANHOLE. SCALE 1:20.



TYPICAL SECTION THRO'

INSPECTION CHAMBER. SCALE 1:20.

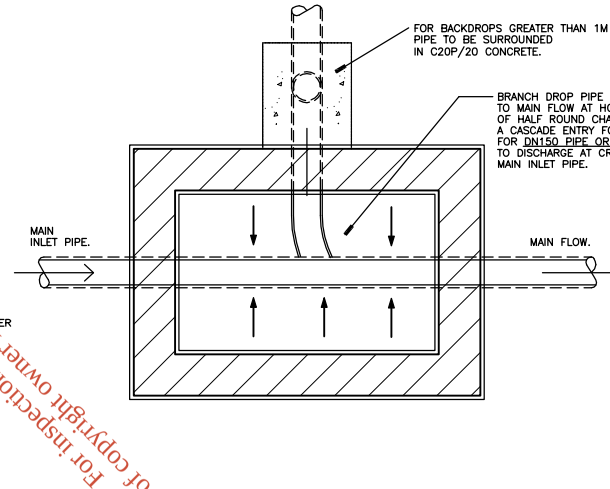
DEPTH LESS THAN 1m TO INVERT OF PIPE.



SECTION THRO' COMMON TRENCH UNDER

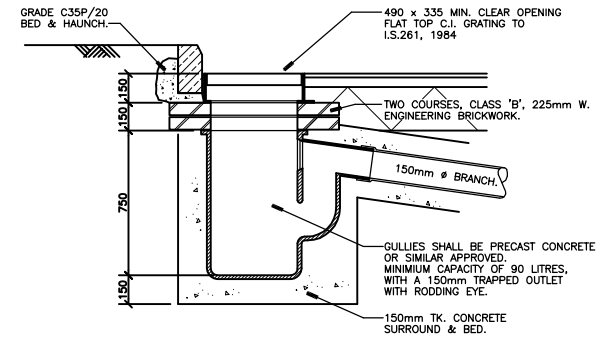
ROAD /PAVED AREAS. SCALE 1:20.

DEPTH GREATER THAN 900mm TO CROWN OF HIGHEST PIPE.



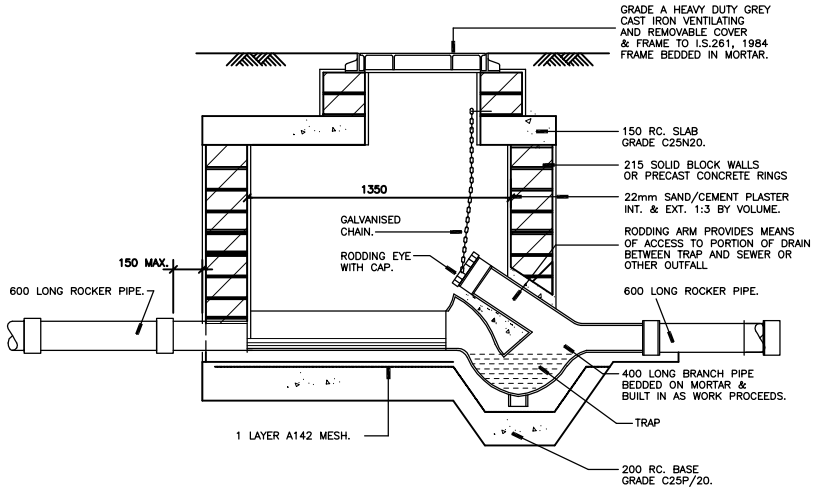
TYPICAL PLAN OF BACKDROP MANHOLE.

SCALE 1:20.



ROAD GULLY DETAIL.

SCALE 1:20.

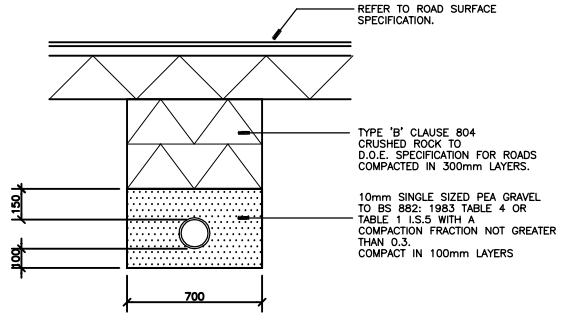


TYPICAL SECTION THRO'

MANHOLE INCORPORATING

INTERCEPTOR. SCALE 1:20.

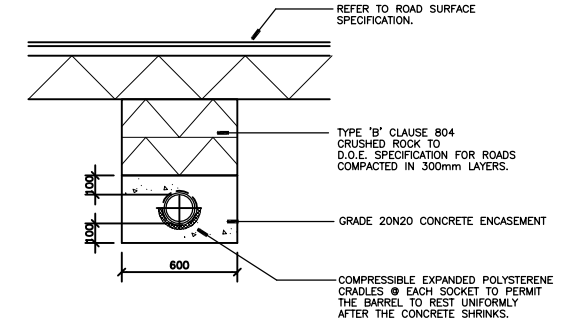
FOR TIEING INTO COMBINED DRAIN.



SECTION THRO' PIPE TRENCH UNDER

ROAD /PAVED AREAS. SCALE 1:20.

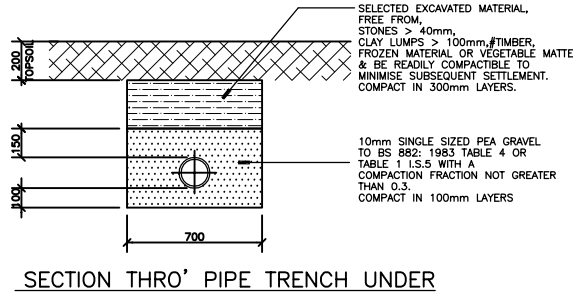
DEPTH GREATER THAN 900mm TO CROWN OF PIPE.



SECTION THRO' PIPE TRENCH UNDER

ROAD /PAVED AREAS. SCALE 1:20.

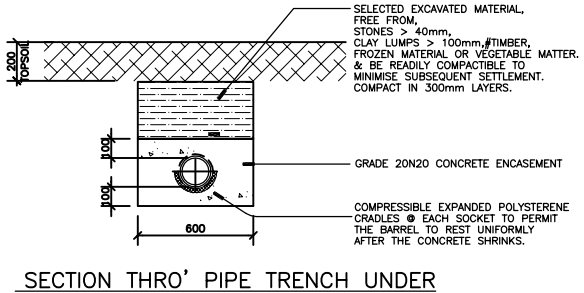
DEPTH LESS THAN 900mm TO CROWN OF PIPE.



SECTION THRO' PIPE TRENCH UNDER

LANDSCAPED AREAS. SCALE 1:20.

DEPTH GREATER THAN 600mm TO CROWN OF PIPE.



SECTION THRO' PIPE TRENCH UNDER

LANDSCAPED AREAS. SCALE 1:20.

DEPTH LESS THAN 600mm TO CROWN OF PIPE.

NOTE:

IF PRECAST CONCRETE RINGS ARE USED, MANHOLE EXCAVATIONS ARE TO BE BACKFILLED WITH LEAN MIX

A	ISSUED FOR CONSTRUCTION	LK	DB	DB	24/08/06
T1	ISSUED FOR TENDER	JG	DB	DB	*
Rev	Description	By	Chk	App	Date

LAWLOR BROS.

Engineering
Management
Environmental
Planning

Apex Business Centre
Blackthorn Road
Sandyford
Dublin 18
Tel: 00353 1293 1200
Fax: 00353 1293 1250

www.wyg.com
e-mail: dublin@wyg.com

White Young Green
Consulting

Project:

ACCESS WASTE NEW SORTING FACILITY

Drawing Title:

DRAINAGE DETAILS SHEET 1

Scale at A1	Drawn By	Date	Checked By	Date	Approved By	Date
NTS	KM	June'05	DB	June'05	DB	June'05

Project No.	Office	Type	Drawing No.	Revision
C003787	11	C&S	08	A

APPROVAL ☐ INFORMATION ☐ TENDER ☐ CONTRACT ☐ CONSTRUCTION ☒

SECTION 3

-

Revised EIS - Non-Technical Summary

Non Technical Summary of the Environmental Impact Statement 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 No.1 to the north of the site and Building No.2 to the rear of the site), an open concrete yard in between and car parking to the front (northern side) of Building No.1. Building No.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 No.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 No.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 indoors inside the new main processing building (Building No.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 Building Nos. 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 of 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.

EIS

This non technical summary forms part of the Environmental Impact Statement (EIS) relating to the proposed development and has been prepared by Access Skips and their Consultants to accompany planning applications to South Dublin County Council and a Waste Licence Application to the Environmental Protection Agency (EPA).

The EIS describes the receiving or existing environment into which the proposed development will be placed. Potential impacts resulting from the development are outlined in the EIS together with proposed mitigation measures, which will prevent or reduce the identified potential impacts.

This Section summarises the EIS 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 Building No. 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 No.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 arisings 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℃ in Winter to 15℃ in Summer.

Results from several air monitoring stations operated in the Dublin region indicate that ambient concentrations of smoke and SO_2' 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/m^2/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 (Ll). 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 north-easterly 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 No. 1 and Building No. 2) with an open concrete yard in between and car parking located to the north of Building No.1 and south of the JFK road. Building No. 1 (758 m^2) houses the facility offices, canteen, meeting rooms, weighbridge office and washrooms to the front (northern) part of the building. The rear of Building No. 1 is used as a plant maintenance facility and for the processing of construction and demolition (C&D) waste. Building No. 2 (615 m^2) 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 No. 1.

The newly acquired premises consists of a warehouse (Building No. 3) measuring some 1,882 m^2, 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 m^2) 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 No.3 and a concrete containment bund for the storage of oils in the southeastern corner of the site. The new Building No. 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 No. 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 No. 3. Building No. 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 No. 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 Building Nos. 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 No.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 No.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 No.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 process i.e. waste handling, processing and treatment will occur between the hours of 6am and 10pm.

Access skips currently employs a total of 25 full time staff. After the proposed expansion of the facility, it is estimated that there will be some 35 full time staff required. There are currently 8 administration staff, 2 accountancy, 2 maintenance and 16 ground staff. The grouand staff comprise 4 full time plant operators, 8 recycling operatives and 4 general operatives.

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 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 No.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 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 No.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 EIS has detailed all potential impacts on the environment; the mitigation measures proposed, and have 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.