



**OFFICE OF LICENSING &
GUIDANCE**

INSPECTORS REPORT ON A LICENCE APPLICATION

To:	DIRECTORS	
From:	BERNIE MURRAY	- LICENSING UNIT
Date:	12 TH SEPTEMBER 2006	
RE:	APPLICATION FOR A WASTE LICENCE FROM GREENCLEAN WASTE MANAGEMENT LTD, LICENCE REGISTER 222-1	

Application Details

Type of facility:	Waste Transfer Station
Class(es) of Activity (P = principal activity):	3 rd Schedule: Classes 11, 12 and 13 4 th Schedule: Classes 2 (P), 3, 4, 13
Quantity of waste managed per annum:	95,000 tonnes
Classes of Waste:	Dry recyclable non-hazardous household, commercial & industrial wastes.
Location of facility:	Coldwinters, Blakes Cross, Lusk, Co Dublin
Licence application received:	2 nd September 2005
Third Party submissions:	Yes, 4
EIS Required:	Yes
Article 14 Notices sent:	16/12/2005; 08/02/2006
Article 14 compliance date:	12/09/2006
Site Inspection:	26 th September 2005

1. Facility

Greenclean Waste Management Ltd has applied for a waste licence for a waste transfer station at Coldwinters, Blakes Cross, Lusk, Co Dublin. This facility falls within the jurisdiction of Fingal County Council and will service the greater Dublin area. The site was previously used and owned by Farringtons for the storage and packaging of animal feed fertiliser grain and seed products. The existing site is located in a small industrial estate comprising an area of 1.12 hectares and is currently operating under Local Authority Waste Permit handling 14,500 tonnes per annum (permit No WPT43). It is proposed to extend the facility to the east of the existing site to occupy an area of 2.33 ha and the proposed new facility will process up to 95,000 tonnes of non-hazardous commercial, industrial, household and C&D waste per annum.

The site is located adjacent to Blake's Cross on the N1 road, 4.7km north of Swords and less than 3.5km south-west of Lusk. The N1 forms the western boundary of the site whilst agricultural land forms the eastern boundary. A small stream, the Ballough stream is a salmonid stream and runs in a north-south direction through the centre of the proposed extended site and drains into the Rogerstown Estuary Special Area of Conservation (SAC) just 100m downstream. The proposed site is not covered by any nature conservation designations. A Health Service Executive (HSE) care unit - the nearest residential unit - and a garden centre bound the northern side. The south of the site is bounded by a number of small industrial units and a large warehouse. In the wider surrounding area the main land use is agricultural with tillage and arable farming as well as scattered rural housing.

It is proposed to extend the site to the east of the Ballough stream to incorporate additional truck and car parking and skip storage. This will necessitate the construction of a bridge over the Ballough stream to facilitate access to the eastern part of the site. The construction of a truck maintenance workshop in the southern part of the site is also proposed.

Classes 11, 12 and 13 of the Third Schedule and Classes 2, 3, 4, and 13 of the Fourth Schedule were applied for. Class 2 of the Fourth Schedule is the principal activity.

The facility accepts waste six days a week between 0800 and 1800hrs Monday to Friday and 0800 to 1400hrs on Saturday. However the facility is operational from 0700 to 2000hrs Monday to Friday and 0700 to 1600hrs on Saturday in order to facilitate site preparations in the mornings and to complete waste processing in the evenings. The site is closed Sundays and Bank Holidays save for any emergency works such as maintenance works that may be necessary.

2. Operational Description

The applicant currently accepts 14,500 tonnes of non-hazardous waste per annum and proposes to increase the current tonnage to 95,000 tonnes per annum within 5 years. To ensure that the facility meets BAT the RD sets out the infrastructure required prior to commencement of waste licence activities (Condition 3). Condition 11 requires that the applicant notify the Agency one month prior to the commencement of the scheduled activities. The RD allows the facility to accept 95,000 tonnes per annum from the date of grant of the licence consisting of household (13,200), commercial and industrial (52,800), and non-hazardous construction & demolition (29,000) waste as detailed in Schedule A. Any variation in the quantity of wastes listed in Schedule A is to be agreed by the Agency, prior to acceptance, subject to the total annual tonnage limit of 95,000 tonnes.

On site operations will include segregation and bulking of waste, waste storage and transfer into vehicles for recovery/disposal off site.

All waste arriving on site in covered trucks/containers will be weighed, documented and will undergo a preliminary inspection before being directed to the main processing area of the warehouse where the waste will be tipped on the floor and will undergo further inspection. Wastes requiring detailed inspection will be tipped within the Waste Inspection Area, which is located on the outer side of the northern wall of the main warehouse. Any unacceptable wastes will be removed to the waste quarantine area, which constitutes a large steel container located along the western wall within the main building. Quarantined wastes will be stored temporarily until they are exported off site to authorised facilities.

All handling of acceptable wastes is carried out indoors, inside the main warehouse structure. A grab machine will segregate the larger waste types -usually large pieces of timber and metal, large furniture and cardboard. The remaining wastes are loaded onto a processing line and are segregated on the basis of different waste types and sizes. A range of waste segregation elements are utilised including trommel screen, star screen, magnets to remove ferrous metals, a windshifter to remove lighter fractions such as plastics, paper and cardboard,

eddy currents to remove non-ferrous metals and handpicking lines where individual waste types can be picked out and segregated.

Wastes may then be baled or compacted into trucks for export to various outlets depending on the type and quality of material. Municipal waste from kerbside collection will be bulked and sent for further segregation/recycling. Cardboard waste from industrial sources will be segregated, baled, stored on-site until there is a sufficient quantity to warrant shipment to markets in the U.K. Non-hazardous C&D waste comprises masonry, bricks, stone, metal and wood. Both ferrous and non-ferrous metals will be segregated and stored in the metal bay prior to collection by an authorised metal scrap merchant. Wood will be stored for chipping off-site. Residual waste and materials not suitable for recycling will be transferred directly to landfill.

3. Use of Resources

The following projected raw material/ energy requirements were provided by the applicant based on a waste throughput of 90,000 tonnes per annum.

- Fuel : 1,961 litres Diesel, 1,250L hydraulic engine oil
- Electricity: 14,500,000 units
- Water: 2,400 m³

4. Emissions

4.1 Emissions to Air

There are no emission points to air at the facility. On site dust monitoring was undertaken at three locations - DM1, DM2 and DM3 during the period February to March 2003. A total dust deposition level of 258 mg/m²/day was recorded for DM1, which while not exceeding the recommended deposition limit of 350mg/m²/day, was elevated. Dust deposition levels for DM2 and DM3 were 34 and 97 mg/ m²/day respectively both of which were well below the recommended dust deposition limit. Further dust monitoring was carried out at DM1 and a new dust monitoring location DM4 both of which were located on the perimeter fence adjacent to the N1 road, between January and April 2006. Dust levels of 223 mg/m²/day and 278.7 mg/m²/day respectively were recorded which again, were within the 350 mg/m²/day limit but would be considered elevated. The high dust levels recorded for DM1 and DM4 were attributed to dust from the N1 road being made airborne by passing traffic.

All vehicles delivering waste to and removing waste from the facility are required to be covered (Condition 6.13) which will minimise potential for dust emission during waste transport. In dry weather site roads are required to be sprayed with water in order to minimise the build up of mud and the generation of airborne dust nuisance during dry conditions. (Condition 6.14).

All waste handling activities are carried out within the waste transfer building (Condition 8.2) to minimise the generation of dust during waste processing. Condition 3.19 requires the installation of dust curtains on the entry/exit points to the waste transfer building in order to minimise fugitive dust emissions. Dust generation in the picking station is controlled by a negative air pressure system. Condition 3.20 also requires the installation of Air Handling Units where the Agency deems necessary.

A dust suppression system in the form of a rotary atomiser system operates within the waste transfer building to keep dust levels to a minimum. Industrial perfumes/odour agents may be added to this system in order to mask or break down any odours, however, given that the amount of putrescible waste processed at the site is small (9,500 tonnes/annum), odour generation is not expected to be significant. Waste for disposal is required to be removed from the facility within 48 hours except during bank holiday weekends when it must be removed within 72 hours of its arrival on site. Waste for disposal stored on site for a 48 / 72 hour period is required to be covered (Condition 6.14). In addition the floor of the waste transfer building where waste is handled is required to be cleaned daily (Condition 6.15).

4.2 Emissions to Sewer

There are no emissions to sewer. Sewage effluent generated on site from the staff canteens and washrooms will be directed to a Biocycle Wastewater Treatment Plant (WWTP) along the western perimeter wall. This WWTP operates under the Biocycle Agreement certificate guidelines as issued by the National Standards Authority of Ireland (NSAI). It is designed to cater for 50 persons, each generating a maximum of 80l/head/day giving rise to a maximum volume of 4,000L sewage per day. The treated effluent is pumped to a percolation area in the northwestern corner of the site, which was designed and constructed in accordance with the aforementioned Biocycle Agreement Certificate guidelines and the EPA wastewater treatment manuals 'Treatment systems for small communities, business, leisure centres and hotels'.

While the system is designed to cater for 50 persons, the licensee in the application has indicated that there are more than 50 persons (c. 55 persons) employed within the facility. Consequently, Condition 3.22.2 serves to assess the loading capacity of the WWTP.

4.3 Emissions to Surface Waters

There are no process emissions to surface water

4.4 Storm Water Runoff

Storm water run off from the roof of the Waste Transfer Building will be collected and directed through gutters and downpipes to surface water attenuation tanks before discharge to the Ballough Stream.

All open yard drainage from the existing site and proposed site extension, drainage from the office roofs and drainage from the wheelwash will pass through silt trap gullies and will be directed through a Klargestor Class 1 full retention oil separator prior to discharge to surface water attenuation tanks and from there to the Ballough stream. The attenuation tanks will incorporate a hydrobrake to provide a buffering capacity and to regulate the rate of flow to the Ballough stream and reduce any potential for flooding in the stream during periods of high rainfall (Condition 6.15).

The Ballough Stream flows through the site and flows past the adjacent industrial areas immediately south of the site before running into the northern tip of the Rogerstown Estuary Special Area of Conservation (SAC) just 100m downstream. The proposed site is not covered by any nature conservation designations. Condition 5.5 states that there shall be no trade effluent, leachate and/or contaminated storm water discharged to surface water drains or surface watercourses.

Surface water samples were collected from the Ballough stream at SW1 (at the northern site boundary), SW2 (at the southern site boundary) and SW3 further south along the stream at Newhaggard bridge where the Lusk Road traverses the stream.

The chemical water analysis demonstrated good water quality at SW1, SW2 and SW3. The bacteriological data however showed high levels of total coliforms and faecal coliforms at each of the three surface-water monitoring locations.

	SW1	SW2	SW3
Total coliforms cfu/ml	6270	22820	7080
Faecal coliforms cfu/ml	308	727	276

The bacteriological results are higher at SW2 than SW1. According to the licensee there are no known or visible discharges from the site that would cause an increase in bacteriological levels. These high levels of coliforms have been attributed to the location of the facility

within a rural catchment where cattle and other farm and wild animals have access to the river and may cause a degree of contamination. However the postulated 'agricultural' source for water quality anomalies is not reflected in the chemical water analysis – only SW3 demonstrates a slightly elevated Ammoniacal Nitrogen level of 0.9mg/l. It may also have been due to some anomaly in sampling depending on the location time and depth of sampling and proximity to the source of contamination. The reason for this irregularity is therefore inconclusive. In any case the key point is there will be continued monitoring of SW1 and SW2 as per Schedule C.7 and under condition 3.22 the licensee is required to provide and maintain a new WWTP for the treatment of foul water from the canteen, toilets and washrooms.

It is proposed to remove a 50,000 litre oil tank located in the southeastern corner of the existing site and in its place construct a new truck maintenance workshop. Condition 6.21 of the RD requires the assessment of soil conditions - and clean-up if necessary - in the area of the former tank, prior to the construction of the workshop. It is also proposed to install two new oil storage tanks and bunds for the storage of road diesel and diesel for on-site plant and equipment and a further oil storage tank for the storage of waste oil from machinery maintenance and any waste oil that inadvertently arrives on site. All of these oil tanks will be double contained and surrounded by an acco drain. All loading/unloading of oils will be carried out within the catchment of the acco drain such that any leaks or spillages will flow to the acco drain, which will be directed to the Class 1 full retention Klargestier diesel interceptor in accordance with Condition 3.14. Condition 3.13 requires the licensee to maintain a supply of containment booms or other absorbent material in order to contain and absorb any spillage that may occur.

4.5 Emissions to ground/groundwater:

There are no direct emissions to groundwater and the RD prohibits any such discharges (Condition 5.6).

All of the waste received on site - with the exception of 9,500 tonnes of domestic waste - will consist of solid, dry, non-hazardous waste. This waste will be handled indoors within the waste processing building, thereby eliminating rainfall and minimising the potential for leachate generation. Leachate generated through the handling of small amounts of domestic waste or soiled water arising from floor washdown (Condition 6.15) will be collected within a contained drainage system within the waste transfer building and directed to four concrete underground sumps (total capacity 103m³) located just outside the warehouse. Any liquid collecting within the sumps will be tankered off site to an authorised waste water treatment plant for treatment and disposal. It is estimated that approximately 30m³ of soiled water/leachate will be generated per annum.

The applicant states that the site is underlain by rocks of the Tobercolleen Formation which is classified by the GSI as a Poor Aquifer – generally unproductive except in local zones. A search of well records held by the GSI revealed that there were no wells located in Coldwinters townland.

The Ballough stream flows through the site and drains southeastward to the Rogerstown Estuary. It is likely that the groundwater flow mirrors the local surface water drainage pattern and flows in an east / southeast direction. The results of a trial pit carried out on site indicate that the depth to the water table is 1.35m. The results of a further trial pit excavated on site to 1.8m did not encounter bedrock and was composed of a layer of clay 1m thick overlying mid to fine sand from 1 to 1.8m below ground level. This would indicate a moderate to high aquifer vulnerability. Condition 3.5 requires that the operational hardstanding surfaces at the facility be concreted and constructed to British Standard 8110 or equivalent. The concrete nature of the surface of the yard coupled with the natural clay layer provides a protective barrier to the downward percolation of soiled water at the site. The licensee proposes to install an asphalt hardstand in the eastern part of the site.

Condition 6.12 requires the licensee to establish a groundwater monitoring programme for the site and any recommendations arising from the report must be implemented within a time period agreed with the Agency.

4.6 Noise:

A 30 minute daytime baseline noise survey was carried out on a representative weekday between the hours of 9.30am and 2.45pm and on a Saturday between the hours of 10.30am and 2.30pm at three on site locations (NP1, NP2 and NP3) and three noise sensitive off site locations (NP4, NP5 and NP6). A further 24 hour measurement was undertaken on site at NP7.

The N1 roadway forms the western boundary of the site with a garden centre nursery and a Health Service Executive (HSE) residential care unit forming the northern boundary (NP1). Light industry and commercial units form the southern site boundary (NP2) while the Ballough stream forms the eastern boundary (NP3) of the existing site. However it is proposed to extend the site to the east of this stream, which presently comprises agricultural land. There are a number of residential properties in the immediate vicinity of the site (NP4 to NP6).

Weekday noise levels of 57.9, 61.1 and 55.2 dB L_{Aeq} and weekend noise measurements of 57.1, 63.3 and 57.7 dB L_{Aeq} were recorded at NP1, NP2 and NP3 respectively. In each case, the noise levels were attributed to passing and/or local traffic, agricultural noise, machinery noise from within the transfer station and some windborne noise. Tonal noise elements were recorded at each of NP1, NP2 and NP3 and again these were attributed to background traffic noise and noise from on site machinery.

Weekday noise levels of 56.1 dB L_{Aeq} and weekend noise levels of 53.9 dB L_{Aeq} were recorded at NP4, which was located on the eastern side of the HSE residential care unit approximately 30m north of the proposed development and the closest residential property to the site. A row of tall fir trees marks the boundary between the unit, the garden nursery and the Greenclean site. The weekday noise level was slightly elevated and was attributed to passing traffic, the movement of on site machinery and agricultural noise. No tonal noise elements were detected. It is proposed to install a 2.1m high timber fence line along a section of the northern boundary of the site in order to provide some noise attenuation to the garden centre and residential care unit. To further mitigate against noise Condition 6.15 prohibits truck parking or skip storage within 40m of this residential unit.

NP5 and NP6 were located at the entrance to private residences approximately 200m north west on the N1 and 400m south of the proposed development at Blakes's Cross respectively. The weekday noise measurements recorded were 82 and 79.8 dB L_{Aeq} respectively while the weekend noise levels were 80.3 and 79.5 dB L_{Aeq} . In both cases the noise levels were attributed to continuous heavy traffic. While no tonal noise elements were detected at NP6, tones were detected at NP5 and were attributed to traffic on the N1.

There was little difference between the weekday and the weekend noise measurements taken on and off site and according to the applicant road traffic noise was the predominant noise source. The RD requires performance of an annual noise survey (Condition 6.16). The noise emission limit values to be measured at any noise sensitive location are set in Schedule B.3.

4.8 Nuisance:

- Litter

According to the applicant all vehicles delivering waste to and removing waste from the facility are covered and all wastes are handled inside the waste transfer station minimising any potential litter problem. In addition, daily litter patrols are carried out

at the site, the yard is regularly swept, the existing site is bounded by a high security chainlink fence on all sides and the same measures will be employed for the proposed extension. Condition 6.13 requires that the litter control provisions proposed by the applicant be applied to control litter at the facility.

- **Dust**

Dust has already been covered under section 4.1

- **Vermin, flies, birds, pests, odour.**

According to the licensee 10% of wastes will originate from domestic sources and the remaining wastes arriving at the facility will consist of dry, non-putrescible waste. All wastes will be handled within the transfer building and will be transported to and from the facility in covered vehicles, thereby minimising the generation of odours and any nuisance from birds.

Wastes deemed unsuitable for processing must be removed from the facility within 48 hours of its arrival on site or within 72 hours on bank holiday weekends. Waste remaining on site overnight must be stored in suitably covered and enclosed containers within the Waste Transfer Building such that odour nuisances are minimised. The floor of the Waste Transfer Building must be cleaned daily during the handling of putrescible waste (Condition 6.15).

The licensee proposes to contract Rentokil Ltd to control rodents. The dust suppression system will have the capability to spray non-toxic biodegradable insecticides for the control of insects or industrial perfumes for the purposes of odour control, if required. The licensee states that insecticides will be sprayed during the night when the facility is closed.

Under condition 6.19 the licensee is required to carry out nuisance inspections on a weekly basis and maintain records thereof.

5. Landscaping

The existing security fence reinforcing the western boundary of the site is a Teflon covered, green, chainlink fence and it is proposed to construct a 1m high bund inside the fence and plant with a variety of native hedgerow trees and shrubs. This will serve to screen the facility from the N1 roadway. The existing conifer trees and security fence at the northern site boundary will be retained. A chainlink fence will be positioned along the boundary of the extension also. The area bounding the stream and the eastern boundary of the site will be planted with small native tree species such as alder and willow to improve the landscaping of the site and to mitigate against visual intrusion.

6. Cultural Heritage, Habitats & Protected Species

The proposed site is not covered by any nature conservation designations although the Ballough stream, which drains the site, is a salmonid stream and runs into the Rogerstown Estuary SAC 100m downstream of the site.

There is no record of prehistoric monuments within 1km of the site in Coldwinters. A number of prehistoric artefacts such as flint blades, flint flakes have however been found in the area. A considerable number of burials were uncovered in a field to the south of the proposed development through deep ploughing in 1957. It is not known how old these burials were. It is proposed to develop the land to the east of the Ballough stream which is presently dedicated to agricultural use. According to the licensee there is potential for the discovery of archaeological remains underneath the ploughzone. It is proposed to undertake Geophysical Investigation prior to development to provide an indication of the presence of archaeological features. This will be followed by targeted archaeological and archaeological monitoring / excavation if and where required.

7. Waste Management, Air Quality and Water Quality Management Plans

The recycling and recovery facility proposed is in keeping with Dublin Waste Management Plan 2005 – 2010.

8. Environmental Impact Statement

I have examined and assessed the EIS and am satisfied that it complies with the EIA and Waste Licensing Regulations.

9. Best Available Techniques (BAT)

I have examined and assessed the application documentation and I am satisfied that the site, technologies and techniques specified in the application and as confirmed, modified or specified in the attached Recommended Decision comply with the requirements and principles of BAT. I consider the technologies and techniques as described in the application, in this report, and in the RD, to be the most effective in achieving a high general level of protection of the environment having regard - as may be relevant - to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

10. Compliance with Directives/Regulations

The facility does not fall under the scope of the Landfill Directive or the IPPC Directive. In relation to the Groundwater Directive the facility will not have any direct emission to groundwater.

11. Compliance Record

The company have operated their facility at Coldwinters in full compliance with Waste permit WPT 43.

12. Fit & Proper Person Assessment

Offences and Convictions

The applicant states that Greenclean Waste Management Ltd or the company directors have never been convicted of any offences under the Waste Management Act.

Technical Competence & Site Management

The company and management team have considerable experience and technical ability, which would qualify them as technically competent.

Financial Provision

The applicants are in good financial standing, given the modest scale and non-hazardous nature of the facility, the operational liabilities are not considered to be substantial.

13. Submissions

There were 3 submission made in relation to this application.

13.1 Submission from Brian Beckett, Fisheries Environmental Officer, the Eastern Regional Fisheries Authority, 15a Main Street, Blackrock, Co Dublin

Mr Beckett is concerned about the impact of this facility on the Ballough stream which is a salmonid channel and drains into the Rogerstown Estuary.

'Surface water from the site will be discharging to this stream and sensitive designated SAC waters downstream. All necessary precautions need to be taken to protect this system. BAT mitigation measures must be fully implemented to ensure protection of the downstream surface water system....comprehensive on-site housekeeping and infrastructural initiatives are required in order to achieve this goal. An adequate buffer zone between the development and stream is essential to prevent any surface run-off into the stream during the construction and operation phase. Some areas of concern would be the management of on-site leachate hazardous liquid and runoff from site operations such as vehicle washing and road sweeping It would also be prudent to carry out a daily visual check on all surface water discharges as well as carrying out physico-chemical and biological analyses of water as set out in the EIS.

Comment:

The applicant is required to monitor ambient water quality in the receiving water as well as monitor the surface water discharge from Klargest Interceptor and associated attenuation tank (Schedules C and B respectively). In granting a licence the Agency must be satisfied that emissions from the activity will not cause environmental pollution or breach any receiving water quality standard.

Condition 5.5 prohibits the discharge of waste water or contaminated storm water to surface water drains and streams bordering the facility.

Condition 3.14 requires the installation and maintenance of silt traps and oil interceptors thereby ensuring that all surface water run-off discharges pass through a silt trap and oil interceptor prior to discharge from the facility. All surface water run-off discharges will emit to attenuation tanks. The attenuation tanks will incorporate a hydrobrake to provide a buffering capacity and regulate the rate of flow to the Ballough stream to reduce any potential for flooding in the stream during periods of high rainfall (Condition 6.15). This in turn will serve to protect the downstream surface water system. In addition, all storage tanks, lagoons etc are required to be fitted with high liquid level alarms (Condition 3.15).

Condition 3.8 stipulates that the wheel wash be inspected daily and drained as required. Silt and stones and other accumulated material shall be removed as required from the wheel wash and disposed of appropriately. All water from the wheel cleaning area will be directed to the trade effluent drainage network i.e. four concrete underground sumps located outside the warehouse. Trade effluent collecting in these sumps will be tankered off site to an authorised WWTP for treatment and disposal.

Condition 6.10 stipulates that the drainage system, bunds, silt traps and oil interceptors will be inspected weekly, desludged as necessary and properly maintained at all times. All sludge and drainage from these operations shall be collected for safe disposal. Condition 6.11 requires that a visual examination of the contaminated storm water discharge be carried out daily and a log of such inspections be maintained.

13.2 Submission from Helen Francis, Development Applications Unit, Department of the Environment, Heritage & Local Government, Dun Sceine, Harcourt Lane, Dublin 2

Ms Francis is concerned about the proximity of the facility to Rogerstown Estuary candidate Special Area of Conservation and Special Protection Area. *'The main threats to the designated site of Rogerstown Estuary is from pollution either of the surface or groundwater at the site of the proposed development that could then get into the estuary'*

Comment:

The precautions taken to ensure that surface water discharges do not become a source of pollution to the Ballough Stream and the Rogerstown Estuary have been dealt with under Submission 13.1.

Condition 5.6 prohibits the discharge of emissions to groundwater.

Sewage effluent arising from on site staff facilities will be directed to an on-site Waste Water Treatment Plant along the western perimeter wall and the treated effluent will be pumped to a percolation area in the northwestern corner of the site. Consequently the WWTP and associated percolation area are located in a part of the site most remote from the Ballough stream.

Condition 6.15 requires that fuels be stored only at bunded locations while condition 6.9 requires that all pipes, tanks, bunding structures and containers be integrity tested within 12 months of the date of grant of the licence and every three years thereafter to ensure they are water tight and will contain the liquids/materials contained within them.

Under Condition 3.5 locations where vehicle movement occurs are required to be impermeable while operational hardstanding surfaces are required to be concreted. Any defects

in the operational surface must be repaired within 5 working days thereby minimising any potential for the percolation of trade effluent to the groundwater.

In accordance with condition 6.12 the licensee is required to establish a groundwater monitoring programme for the site.

13.3 Submission from Myles Farrell and Les Doyle, Planning Department

The Planning Department submits that *the site is surrounded by land zoned for agri-business uses and any expected negative impacts of the proposed operation (and its increased intensity of use) on these land uses should be considered. These would include mitigation of impacts relating to noise, dust and odour emissions and increased impact of increased vehicular movements. Impacts on HSE residential Unit and Horticultural Unit should be considered. It is noted that parking and skip storage would be in close proximity to the residential Unit and only a stream separates the two sites. Appropriate boundary treatment and setbacks may need to be detailed. Impacts on the existing stream which runs through the site would also need to be examined.*

Comment:

From a zoning point of view it is noted that the site is already authorised as a waste management activity (Local Authority Waste Permit).

Most of the waste received on site will be solid dry and non-hazardous in nature which will not give rise to odours. Only 9,500 tonnes of domestic waste will be received. All waste will be transported to and from the facility in covered vehicles (Condition 6.13) and all waste will be handled within the waste transfer building (condition 8.2) which will minimise the potential for the generation of both dust and odour. Waste for disposal is required to be removed from the facility within 48 hours except during bank holiday weekends when it must be removed within 72 hours of its arrival on site. Where such waste is stored on site for a 48 / 72 hour period it is required to be covered (Condition 6.14). In addition, the floor of the waste transfer building is required to be cleaned daily where putrescible waste is being handled (Condition 6.15).

The installation of dust curtains on the entry/exit points to the waste transfer building will minimise fugitive dust emissions (condition 3.19).

A row of tall fir trees provides the boundary between the HSE residential Unit and the horticultural centre, and the Greenclean site. It is also proposed to install a 2.1m high timber fence line along a section of the northern boundary of the site in order to provide some noise attenuation to the garden centre and residential care unit. In addition, the area bounding the stream and the eastern boundary of the site will be planted with small native tree species such as alder and willow to improve the landscaping of the site and to mitigate against visual intrusion. The HSE residential Unit constitutes the nearest noise sensitive receptor. Schedule B3 sets the emission limit values to be measured and requires that there be no tonal noise element audible at noise sensitive locations. Condition 6.15 stipulates that all waste related activities including heavy vehicle parking and skip storage shall not be permitted within 40m of the HSE Residential Unit.

13.4 Submission from Pat Doherty, Acting Chief Executive Officer, Eastern Regional Fisheries Board, 15a Main Street, Blackrock, Co Dublin.

Mr Doherty makes a number of points in his submission

- *The Ballough River which forms a boundary to the east of the site and drains into Rogerstown estuary is a salmonid channel which is confirmed by our qualitative data. Precautions need to be taken to protect this system. An adequate buffer zone between the development and stream is essential to prevent any surface run-off into the stream during construction and operation phase. Good housekeeping measures should also be implemented to prevent excessive turbid run-off to surface water systems. The installation of petrol/oil interceptors as planned will also be essential.*

Comment:

The precautions taken to ensure that surface water discharges do not become a source of pollution to the Ballough Stream and the Rogerstown Estuary have been dealt with under Submission 13.1. Condition 5.6 prohibits the discharge of emissions to groundwater.

- *Pollution of the adjacent freshwaters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this freshwater system. A comprehensive and integrated approach for achieving surface water protection during plant construction and operation should be implemented as described in the EIS.*

Comment:

Up until the operation formally commences licensable waste activities, all construction related activities are the responsibility of the Local Authority. Following activation of the licence all operations on the site will be subject to the controls in the licence.

- *Substantial potential exists for pollution of local surface waters as a result of foul water loadings from this development....any waste recycling activities must not have a negative impact on the quality of surface waters and or salmonid habitats in the Ballough catchment.*

Comment:

Mitigating measures to prevent the pollution of local surface waters have been dealt with under Submission 13.1 and 13.2

- *It is recommended that the “Requirements for the protection of Fisheries Habitat during Construction and Development Works at River Sites” be consulted when undertaking any works on this site particularly in the vicinity of surface water feature. The Board requests that it be informed at least 3 – 4 weeks in advance of any diversion work to be carried out during channel alterations of any kind.*

Comment:

Measures to address this submission were introduced under Condition 3.3.

- *Monitoring of the biological quality of the Ballough River will be essential to verify effectiveness of pollution preventative measures. The surface water monitoring programme should provide for a visual inspection of any discharges and interceptors on a daily basis.*

Comment:

Condition 5.5 prohibits the discharge of wastewater or contaminated storm water to surface water drains and streams bordering the facility. The applicant is required to monitor ambient water quality in the receiving water as well as monitor the surface water discharging from the Klargester Interceptor and associated attenuation tanks into the Ballough Stream (Schedules C and B respectively). In addition, Condition 6.11 requires that a visual examination of the contaminated storm water discharge be carried out daily and a log of such inspections be maintained.

14. Charges

The RD requires the applicant to pay a contribution of €7222.50 for the year 2006.

15. Recommendation

I have considered all the documentation submitted in relation to this application and recommend that the Agency grant a licence subject to the conditions set out in the attached PD and for the reasons as drafted.

Signed

Inspectors name

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2003.