



Environmental Health Officers Department Block E Westland Park New Nangor Road Clondalkin Dublin 12

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Environmental Protection Agency
Headquarters PO Box 300
FAO Noeleen Keavey Programme Officer
Office of Licencing and Guidance
Johnstown Castle Estate
Co Wexford

Date 17<sup>th</sup> November 2006

Dear Ms Keavey

Waste Licence Application Lawlors Brothers Waste Disposal re; Unit 28, JFK Rd, JFK Ind Est, Clondalkin, Dublin 12

I refer to recent correspondence concerning the EPA's consultation on this licence application. This premises falls within my functional area and I can report as follows;

This plant has been in operation for some years now in the absence of complaints. The nearest residential properties lie within the Park West development and some isolated residential properties on the Killeen Road (opposite the entrance to JFK Ind estate).

The issue of effluent release to the foul and surface drainage system is a matter for the Drainage Engineer for South Dublin County Council with whom we have a good working relationship. South Dublin Co Council will monitor all such discharges and review monitoring results submitted by the company.

I list the recommended conditions below

- The applicant shall ensure that an adequate Pest Control contract shall continue to operate to prevent and control possible rodent, animal, insect or bird activity on site.
- 2. Best Practicable Means shall be employed to minimise fugitive air blown dust being emitted from the site.
- 3. The developer shall ensure that the external lighting system is designed to minimise potential pollution from glare and spillage.

- 4. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level. For this reason I am concerned about the proposal at some time in the future to move to a 24 hour operation. There are residential properties at the entrance to the JFK Ind Est who may be affected by air brakes on delivery vehicles and reverse sirens. Any impulsive sounds within the building must be avoided between the hours of 6 a.m. and 7a.m. and between 7 p.m. and 10 p.m. This Department would not object in principle to processing hours of 6 a.m. to 10 pm within the building, but we would recommend that impulsive noise should be controlled to limit the potential for noise nuisance.
- 5. A traffic Management system should be in place to ensure HGV manoeuvres do not create a noise nuisance and waiting vehicles do not create an odour problem.
- 6. All mechanical plant and ventilation inlets and outlets should be sound insulated and/or fitted with sound attenuators as necessary to ensure that the noise level as expressed as Laeq over 15 minutes at 1 meter from the façade of any noise sensitive location does not exceed the background level by more than 10 dB(A) for daytime and shall not exceed the background level for evening and night time.

This agency would not object to the granting of a Waste Licence to Lawlors Brothers Waste Disposal re; Unit 28, JFK Rd, JFK Ind Est, Clondalkin, Dublin 12 by the Environmental Protection Agency.

If you have any queries please contact either the undersigned or Ms Catherine Gavin, Senior Environmental Health Officer, tel 4609 632.

Yours sincerely

Tom Prendergast

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Principal Environmental Health Officer