

Document Amendment Record

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1 INTRODUCTION

1.1 Current Facility and Proposed Change of Use

RILTA Environmental Ltd. (hereafter referred to as RILTA -formerly known as SITA Environmental Ltd.) operates an existing Integrated Waste Management Facility at Block 402, Grant's Drive, Greenogue Business Park, Rathcoole, Co. Dublin.

The facility located in south west County Dublin is adjacent to Newcastle, approximately 1.5km north of the village of Rathcoole. Access to the facility is from the south, from the R120 that joins the N7 (Dublin-Limerick road). An overview of the regional site location is contained in Figure 1.1.

Planning Permission was granted by An Bord Pleanála for this facility in 2003- Planning Register Reference Number: SD 02A/0313 and An Bord Pleanála Reference Number: PL 06S.201534. The area referred to as "Zone A" in the original Planning Application is the current operational area of RILTA Environmental Ltd. The facility also operates in accordance with a Waste Licence granted by the Environmental Protection Agency (EPA) –Waste Licence No.192-1.

Construction on the facility began in 2003 and RILTA began accepting waste in December 2004.

TOBIN Consulting Engineers (hereafter referred to as TOBIN) have been commissioned by RILTA to undertake an EIS in order to apply for an increase in the annual volume of contaminated soil that is stored at RILTA prior to transfer off-site.

Based on the terms of the current Planning Permission for the site at Greenogue, the threshold of waste accepted on site shall not exceed 62,500 tonnes save with a prior grant of Planning Permission. TOBIN wish to submit an application, on behalf of RILTA, for an increase in the annual throughput of waste at the site from 62,500 tonnes per annum to 111,000 tonnes per annum. The increase in annual tonnage will be due to an increase in the quantity of soil accepted and transferred from the site.

The continued use of the RILTA facility will not lead to any change in infrastructure or processing within the site.

The site covers 1.1 hectares and is covered in hardstanding made ground. Information presented in the original EIS for this facility included baseline environmental studies of the site and the area was described as unmanaged grassland that has been disturbed in the past. The site is bounded to the north by the Griffeen River. A 3m wide pathway is adjacent to the Griffeen River north of the RILTA site. A two metre strip of landscaping has also been left inside the site boundary around the perimeter of the site.

The elevation of the site, which gently slopes in a northerly direction, is approximately 87.5mOD (Ordnance Datum-OD).

1.2 Need for Environmental Impact Statement (EIS)

The consequences of any major engineering project are required to be presented in the form of an Environmental Impact Statement (EIS). The EIS as prepared contains a description of the existing environment, information on the scale and nature of the proposed change of use, an impact assessment of the proposed change of use and mitigation measures to reduce the impact on the receiving environment. This document provides a non-technical summary of the overall EIS describing the existing environment, current operations at the facility and potential impacts and mitigation measures of the proposed change of use.

1.3 Consultation

In accordance with Section 4 of the *Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2002)*, the consultation process consisted of consultation with competent bodies, statutory bodies, and interested parties. The primary objective of involving competent bodies, statutory bodies, and interested parties at an early stage in the Environmental Impact Assessment process is to aid scoping of the EIA. The following Table 1-1 lists the various parties consulted to-date.

Table 1-1 Organisations Consulted as Part of the EIA Process

Consultee	Date of Written Correspondence	Date & Response
South Dublin County Council Director of Services- - Environment	2 nd March 2007	8 th March 2007 (phonecall)
South Dublin County Council – Director of Services- - Planning	2 nd March 2007	-
South Dublin County Council – Director of Services-Economic Development	2 nd March 2007	-
Department of Agriculture	2 nd March 2007	12 th March 2007
The Geological Survey of Ireland	2 nd March 2007	-
Faite Ireland	2 nd March 2007	-
Coillte Teoranta	2 nd March 2007	-
The National Roads Authority	2 nd March 2007	12 th March 2007 (acknowledgement of letter)
Irish Wildlife Trust	2 nd March 2007	-

BirdWatch Ireland	2 nd March 2007	-
The Heritage Council	2 nd March 2007	-
Eastern Regional Fisheries Board	2 nd March 2007	-
District Conservation Officer - Dublin	2 nd March 2007	-
An Taisce	2 nd March 2007	-
Teagasc	2 nd March 2007	-
Electricity Supply Board	2 nd March 2007	-
Bord Gais	2 nd March 2007	9 th March 2007 (Email)
Health and Safety Authority	2 nd March 2007	-
Environmental Protection Agency	2 nd March 2007	-
DoEHLG- Development Applications Unit	2 nd March 2007	-

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Figure 1.1
Site Location Map

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2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 Site Location

The facility located in south west County Dublin is adjacent to Newcastle, approximately 1.5km north of the village of Rathcoole. Access to the site is from the south from the R120 that joins the N7 (Dublin-Limerick road). An overview of the site location is contained in Figure 1.1.

The site covers 1.1 hectares and is covered in hardstanding made ground. The site is bounded to the north by the Griffeen River.

This application is concerned with obtaining planning permission for an increase in the annual throughput of waste at the site from 62,500 tonnes per annum to 111,000 tonnes per annum. The increase in annual tonnage will be due to an increase in the quantity of contaminated soil accepted and transferred from the site. There will be no change to the infrastructure on site and no processing of this soil, with the exception of handling the soil.

2.2 The Need for the Change of Use

The Department of the Environment, Heritage & Local Government's waste management policy document "Environment in Focus 2006" identifies that contaminated soil was the largest single hazardous waste type generated in 2004, accounting for 45.6 per cent of total reported hazardous waste. The continuous increase in the quantity of contaminated soil reflects the scale of redevelopment of brownfield sites.

Since operations began at RILTA in 2004, the Integrated Waste Management Facility has been working close to and often at its maximum tonnage allowance. The majority of this allowance is assigned to contaminated soil that is taken in to the facility for storage without any processing being required. When enough waste has accumulated for export (~1,500 – 3,000 tonnes) and a Trans-frontier Shipment notification is in place, waste is re-loaded onto tipper trucks and transported to port where the waste is tipped on to a specialised bulk storage tray on a ship.

In order for RILTA to continue to work to its optimum and in order for the correct management of contaminated soil in the greater Dublin region, it is important that RILTA can accept the required volume of contaminated soil that is being removed from brownfield sites in the region and transported to the facility for storage until it is exported.

RILTA also employs up to 65 personnel, full time at the current integrated waste management facility. Staffing numbers include operations managers, general managers, accountant, yard managers, maintenance engineer, vehicle drivers, general operatives and office staff.

2.3 Alternatives

As part of the scoping process relating to this EIS, alternatives to the existing site were considered. However, the change in use at the facility will not necessitate any infrastructural changes to the existing buildings and no additional processing will be required. Therefore, in terms of environmental, technical and financial impacts that would be result from operations being moved to another location, the current site location and facility is favourable for the increase in tonnage allowance sought by RILTA.

2.4 Change of Use Procedures

Best Available Techniques (BAT) principles will be applied in planning and executing the increase in tonnage, to ensure that impacts on the environment will be minimal. No construction will be required or changes to the current onsite processes. The only exception being that the quantity of contaminated soil handled will be increased. This will be within the curtilage of the existing building and in effect will be an optimisation of use of this building.

2.5 Traffic

The existing RILTA site is located along Grants Drive in the Greenogue Business Park, which is situated on land to the north of the regional road R120 approximately 1 kilometre from Newcastle.

The Business Park has two access roundabout junctions. The first is located at the junction between the R120 and Grant's Road, south west of the facility. The second roundabout is located at the junction between the R120 and College Road south east of the facility. A new network and roundabout are currently under construction on the Rathcoole side of the facility, that is, to the east of RILTA.

It was noted that the total traffic generated by the RILTA development transporting soil to and from the site over the course of the hours of operation equated to 0.36% of traffic passing through the R120 / Grants Road roundabout junction during the same time period. The increase in tonnage allowances to 111,000 tonnes per annum will equate to an increase in heavy vehicles from the RILTA site of 0.25% of total traffic. The NRA "Traffic and Transport Assessment Guidelines" state that analysis of a junction in relation to a development should be undertaken if development-generated traffic exceeds 10% of total traffic, while this figure drops to 5% in the case where a junction is nearing capacity. In this instance, it is clear that the development-generated traffic falls below both thresholds, and thus no capacity analysis of the roundabout junction is required.

Recommendations include reinstatement of road markings at the R120 / Grants Road and R120 / College Road roundabout junction and for the pavement to be reinstated in areas where deterioration is evident.

A total of 32 car parking spaces are provided at the site and this number will not change.

Pedestrian movement is catered for at the RILTA facility entrance and this continues towards the R120 regional road.

2.6 Landscaping

The site is operational and as such is covered in hardstanding “made ground”. However, a 2m strip of landscaping is maintained and managed along the inside perimeter of the site.

3 DESCRIPTION OF EXISTING ENVIRONMENT, POTENTIAL IMPACTS AND PROPOSED MITIGATION MEASURES

3.1 Human Beings/Socio-Economic

3.1.1 Existing Environment

Due to the facility’s current location in a Business Park, there are a limited number of residences likely to be directly or indirectly affected by the facility. In the South Dublin County Development Plan 2004-2010, lands surrounding the facility have been given a specific local zoning objective ‘LZ 011-Greenogue, Newcastle’, which is zoning for Office Use. It has also been given a general Zoning Objective ‘E’ which is an objective to provide for enterprise, employment and related uses. Light industry and refuse transfer stations are permitted in principle within this zoning category and therefore the facility is a suitable use for this land. In addition to the RILTA facility there are a number of waste facilities in the business park. It currently provides 65 jobs and this number will be sustained for the lifetime of the facility.

3.1.2 Potential Impacts

There is no public right of way through or near the facility and the increase in the annual volume of contaminated soil will not have a negative impact on amenities and tourism in the area and will have limited effects on the local population, as the facility is already in operation. The facility and the proposed increase in tonnages do not impact on any views. There are no designated or proposed walking and cycling routes in the vicinity of this facility and therefore none will be impacted upon. Casement Aerodrome is located 2.1km northwest of the facility and will not be impacted upon by the proposed developments at the facility. The facility will be managed in such a way as to limit the impact of its operation on the surrounding environment.

3.1.3 Mitigation Measures

There are no mitigation measures proposed.

3.2 Ecology

3.2.1 Existing Environment

No further field surveys were undertaken as the proposal does not involve any change to the footprint of the site or development of any semi-natural vegetation. The existing site is now all made ground. The ecological assessment carried out in 2002 was reviewed.

A biological assessment of the Griffeen river in 2002 produced 'Q' values of 2-3, indicating moderate pollution. A repeat of this assessment at the same sampling points in 2005 gave 'Q' values of 3-4, slightly polluted, indicating an improvement in the water quality in the Griffeen river as shown by biological assessment techniques.

3.2.2 Potential Impacts

There will be no direct impacts on the ecology of the existing site. An increase in truck movements may lead to an increase in dust production and an indirect impact on the Griffeen river, although mitigation measures are in place to deal with dust produced on site and dust has not been a problem for the existing facility.

3.2.3 Mitigation Measures

There will be no direct impacts on the ecology of the existing site and no mitigation measures required. There is potential for wind blown dust to reach the Griffeen river and it is recommended that biological assessment of the river be undertaken every three years. The biological assessment should follow the same methodologies and be carried out at the same locations as the previous assessments.

3.3 Geology

3.3.1 Existing Environment

Information presented in the original EIS baseline studies for this facility states that previously the site consisted of unmanaged grassland that had been disturbed in the past. The dominant soil types noted within the boundaries of the site were podzols and organic rich peat soil, as noted during the site investigations in 2002. The subsoils encountered on the site were generally tills, with limestone clasts. Underlying bedrock is described as generally dark shales with some very thin quartz veins.

The site is currently covered in hardstanding "made ground", and no geology is evident at the surface.

3.3.2 Potential Impacts

As the proposed changes to the facility do not involve any changes to the physical

environment at the RILTA site, i.e. no additional buildings or infrastructure will be required, there will be no impact on the geology of the underlying the site.

3.3.3 Mitigation Measures

The facility is covered in made ground, with the exception of a 2m area of landscaping along the perimeter of the site. Therefore, no direct or indirect impacts on the underlying geology are predicted and no mitigation measures are recommended.

3.4 Water

3.4.1 Existing Environment

Reference to existing information indicates that the current site is located within the Griffeen River and the Greater Liffey Catchment. All surface water within this catchment drains to tidal water in Dublin Bay. The Griffeen River flows outside the northern boundary of the site. The Griffeen River, is tributary of the River Liffey comprises a catchment area of approximately 13 km². The origin of the Griffeen River lies ca. 2km to the south west of the current site. The Griffeen River flows north for ca. 500 m (to the east of the site) and then flows west flowing outside the northern boundary of the site. The Griffeen River then trends in a northerly direction and meets the River Liffey at Lucan, ca. 7.5 km north of the site.

Recent and historical water sampling by TOBIN Consulting Engineers of the Griffeen River indicates that the water quality in the river is classified as good, based on quarterly monitoring carried out in accordance with the Waste Licence 192-1.

According to the Geological Survey of Ireland, the bedrock underlying the subject site is classified as a Locally Important Aquifer, which is Moderately Productive only in Local Zones. There are no existing groundwater abstraction points at the subject site, nor are there any proposed.

3.4.2 Potential Impacts

There will be no direct impacts on the surface water or groundwater environments at the facility due to an increase in the volume of contaminated soil accepted for storage and transfer. The site is covered in made ground and all contaminated soil is stored carefully in the hazardous waste transfer station.

If the incoming contaminated soil is moist, there is a risk of run-off from the soil. This contaminated water, if not managed correctly could enter the surface water runoff that is collected from the hard-standing areas and be ultimately discharged to the Griffeen River.

3.4.3 Mitigation Measures

In order to avoid any possible risk of surface water or groundwater contamination from the increased stockpiles of contaminated soil, it is important to manage any runoff from the hazardous waste transfer station.

The hazardous waste transfer station is a bunded reinforced concrete area, which has been previously tested and certified as leak proof. Waste is inspected on arrival to ensure its suitability for storage.

When enough soil has accumulated for export (~1,500 – 3,000 tonnes) and a Trans-frontier Shipment notification is in place, waste is re-loaded onto tipper trucks and transported to port where the waste is tipped on to a specialised bulk storage tray on a ship. In this way, no additional infrastructure or extensions are required at the facility to store additional soil.

Due to the ‘made ground’ nature of most of the contaminated soil product, very little leachate is produced while it is being stored on site, therefore the soil storage building does not include a drainage system. Any leachate that is produced will be disposed of in the on-site wastewater treatment plant, using the waste vacuum tankers for facilitating transfer to the wastewater treatment plant.

3.5 Air/Climate

3.5.1 Existing Environment

As per Schedule D of Waste Licence 192-1, air monitoring is carried out at the RILTA Environmental Ltd. facility. Dust monitoring is carried out three times a year. Annual air emission monitoring for T.A. Luft Organics Class 1 and Characterisation of the VOC emission is carried out along with bi-annual monitoring of total organic carbon as set out in the Waste Licence. The change of use at the site will not have any effect on air emissions.

3.5.2 Potential Impacts

Construction activities at the site have the potential to result in wind blown dust at the site. The RILTA facility, however, is fully constructed and the continued use of the site will not lead to any change in infrastructure or processing within the site. All operations take place within fully enclosed buildings and this will mitigate potential dust impacts. As the level of dust at the facility may increase due to an increase in soil stored at the site, the future results of the ongoing routine monitoring (Waste Licence 192-1) will be analysed for any change in current dust levels. In addition, staff at RILTA will try to ensure that all deliveries of soil to the site will be covered in order to prevent soil blowing from the tipper trucks prior to storage in the soil shed. The site and the proposed increase in

tonnages will not impact on the regional climate.

3.5.3 Mitigation Measures

The following mitigation measures will be put in place:

- The future results of the ongoing routine monitoring (Waste Licence 192-1) will be analysed for any change in current dust levels.
- Vehicles delivering material with dust potential will be enclosed with tarpaulin at all times to restrict the escape of dust.

3.6 Noise/Vibration

3.6.1 Existing Environment

A baseline noise survey was carried out to establish the existing noise levels in the area surrounding 20th December 2006 during the day (for 30 minute intervals) at four agreed EPA locations. Night time noise monitoring was also carried out on the 20th December 2006. This noise survey reflects the existing day and night time noise environment at the boundary of the site during a period of operation of the transfer station.

The continued use of the RILTA facility will not lead to any change in infrastructure or processing within the site and thus no change in noise emissions associated with these activities. However an increase in traffic (heavy goods vehicles) movements associated with the site will result and thus an increase in road traffic generated noise levels at receiving noise sensitive locations along the route of road traffic.

3.6.2 Potential Impact

The proposed increase in soil transferred to, stored on and transferred from the site will result in an increase in heavy vehicles from the RILTA site of 0.25% of total traffic.

There is a logarithmic relationship between noise levels and traffic volume and the higher the existing traffic volume the greater is the traffic increase required to produce a perceptible noise change. Typically doubling the road traffic flow produces a 3 dB(A) change in noise level. An increase in vehicular movements of the order proposed will continue to have a negligible noise impact along the local road network.

3.6.3 Mitigation Measures

The mitigation measures recommended in the EIS accompanying the original planning application should remain in place:

- The operation of all fixed plant is carried out within a housing envelope giving an overall sound reduction of 20 dB(A);
- All doors of the building to be kept closed except for truck movement in/out
- All fixed plant, mobile equipment (trucks etc.) are properly serviced and

maintained in good condition

- All machinery operators are instructed to avoid unnecessary revving and observe good noise control practice
- All areas where skips are loaded on / off trucks have a hardstand overlain with a wood material (sleepers) or alternative material to avoid impulsive sounds; and
- The air extraction system where necessary is contained within the main buildings inside an acoustic enclosure.

3.7 Landscape/Visual Aspects

3.7.1 Existing Environment

The site itself comprises an area of made ground, sloping gently towards the north where the Griffeen River flows north of the site boundary. This boundary is relatively enclosed on account of the existing hedge beyond the river and a small number of trees adjoining the riverbank. A railing and an area of ground approximately 3m in diameter exists between the northern site boundary and the river. Similarly, a boundary railing forms the site's eastern, western and southern boundaries.

Principal vantage points are from the area within a few hundred metres of the site. On account of the relatively flat topography, intervening vegetation and other buildings frequently screen the site from view. While there is relatively little vegetation in the immediate vicinity of the site, it is more extensive throughout the surrounding agricultural and residential areas. Existing industrial buildings that adjoin the site are particularly significant in screening the site. It is estimated that these buildings are in the region of 7-12 metres high.

To the south and southeast, higher ground affords distant views of the industrial estate as a whole within the much wider context of a panoramic landscape. At this distance, the facility makes no contribution to the nature of these views and is absorbed into the existing industrial estate.

Topography screens the business park as a whole from the N7 to the south and southwest, with partial views afforded from the elevated interchange at Rathcoole and glimpses from the east.

Views from local roads occur along the R120 between Rathcoole and Newcastle. The facility itself is partially or completely screened in all views, with glimpses afforded through gaps in the roadside vegetation and between existing, mostly industrial, buildings. From the road at Commons Little and to the north, there are brief glimpses between the houses towards the industrial estate, but local topography, houses and vegetation combine with the existing industrial units to screen the site in almost all instances.

3.7.2 Likely Significant Impacts

There are no proposals to change the current infrastructure at the site or construct additional infrastructure. Therefore, there will be no impacts on the landscape or the visual appearance of the site due to the proposed increase in the tonnage of contaminated soil at RILTA.

The site is covered in made ground, with the exception of a 2m strip of landscaping within the perimeter of the facility. This area of ground has been landscaped, planted and is maintained by RILTA staff.

3.7.3 Mitigation Measures

As there will be no predicted impacts on the visual assessment or landscape within or surrounding the facility as a result of the proposed change of use at RILTA, there are no recommended mitigation measures.

3.8 Cultural Assets & Archaeology

3.8.1 Existing Environment

The existing site covers 1.1 hectares and is covered in hardstanding made ground. The site is bounded to the north by the Griffeen River. A 3m wide pathway is adjacent to the Griffeen River north of the RILTA site. A two-metre strip of landscaping has also been left inside the site boundary around the perimeter of the site.

3.8.2 Potential Impacts

As the proposed changes to the facility do not involve any changes to the physical environment at the RILTA site, i.e. no additional buildings or infrastructure will be required, there will be no impact on the archaeological or cultural heritage.

The surface is currently comprised of made-ground, with the exception of a 2m landscaped boundary surrounding the perimeter which has been planted and maintained since the facility was constructed.

Avoidance or alteration to existing proposals is not required for archaeological reasons.

3.8.3 Mitigation Measures

This development has no significant impacts; accordingly no mitigation measures are required.

3.9 Traffic

3.9.1 Existing Environment

As part of the Traffic Impact Assessment for the proposed increase in tonnage of soil at the Rilta facility, a traffic count was carried out at the R120 / Grants Road site access roundabout junction on Tuesday the 27th of February 2007, between the hours of 07.00 and 19.00. It was found that the peak network hours occurred between the hours of 08:30 – 09:30 and 16:15 – 17:15. Overall there was a HGV content of 16.6%. Details of a traffic survey carried out at the site access junction were also available, which was carried out in hourly intervals between 07:00 – 18:00 on the same day.

The site access junction is located within the 20km/h speed limit. Visibility of 3.0 x 70 metres is provided in both directions at the site access junction.

3.9.2 Potential Impacts

It was noted that the total traffic generated by the RILTA development transporting soil to and from the site over the course of the hours of operation equated to 0.36% of traffic passing through the R120 / Grants Road roundabout junction during the same time period. The increase in tonnage allowances to 110,000 tonnes per annum will equate to an increase in heavy vehicles from the RILTA site of 0.25% of total traffic. The NRA "Traffic and Transport Assessment Guidelines" state that analysis of a junction in relation to a development should be undertaken if development-generated traffic exceeds 10% of total traffic, while this figure drops to 5% in the case where a junction is nearing capacity. In this instance, it is clear that the development-generated traffic falls below both thresholds, and thus no capacity analysis of the roundabout junction is required.

3.9.3 Mitigation Measures

It is recommended that road markings at the R120 / Grants Road and R120 / College Road roundabout junction be reinstated. It is also recommended that the pavement be reinstated in areas where deterioration is evident.

3.10 Interaction of the Foregoing

The significant impacts of the change of use at RILTA and the measures proposed to mitigate these impacts have been outlined in this report. However, in any development with the potential for environmental impact there is also a potential for interaction between impacts of the different environmental aspects.

Human Beings will interact with several of the other relevant topics aforementioned. The current facility will not change in terms of infrastructure or processing, however, human beings will interact with potential impacts such as traffic volume increases and noise level

increases. These levels are insignificant as discussed below.

The proposed increase in soil transferred to, stored on and transferred from the site will result in an increase in heavy vehicles from the RILTA site of 0.25% of total traffic. Increase in traffic on the local road network will result from increased traffic movements. The overall impact of the change in use in transportation terms will be an increase in local HGV (Heavy Good Vehicles) traffic. The existing roads have adequate reserve capacity to cater for an increase in traffic flows and the overall increase as been found to be insignificant in terms of its impact on the current traffic in the area. Social and travel patterns, pedestrian or otherwise, will not be disrupted by this change of use as no roads or pedestrian ways will be severed. Noise levels will increase marginally with the increase in traffic but as the increase in traffic levels is insignificant, so too is the noise related impact.

In terms of ecology, there will be no construction as a result of the change of use and therefore no impact on the existing ecology. However, any dust resulting from the increased volumes of soil should continue to be monitored. Dust could enter the Griffeen River and impact on the river ecology. In this way, the air in this environment and the ecology interact, with some potential interaction with the surface water of the Griffeen River.

Impacts on surface water and groundwater will primarily relate to leachate runoff and drainage. Foul and surface water will be drained from the site to the wastewater treatment plant on site and thus will not impact on any adjacent water bodies.

Noise and dust control will be in accordance with strict EPA guidelines and in compliance with the Waste licence for the facility (Waste Licence No. 192-1). There will be no impact on the microclimate.

While there is potential for the above impacts to interact and result in a cumulative impact, it is unlikely that any of these cumulative impacts will result in significant environmental degradation.