



Environmental Protection Agency
An Ghníomhaireacht um Chuimhneáil Comhshaoil

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6th April 2009

Reg. No. W0256-01

Dear Sir/Madam,

The Environmental Protection Agency is currently assessing a waste licence application from Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, Co. Mayo for the recovery of waste to land at a site located at Tallagh, Belmullet, Co. Mayo.

The applicant holds an existing waste permit for the recovery of waste to land (Mayo Co. Co. Waste Facility Permit PER 144, issued 30th January 2006). The principal activity is identified as Class 10 of the Fourth Schedule of the Waste Management Act 1996:- the spreading of any waste on land with a consequential benefit for an agricultural activity or ecological system.

The activities proposed in the waste licence application involve the acceptance of 24,900 tonnes per annum of non-hazardous/inert waste (Construction & Demolition waste and waste resulting from quarrying). The waste is to be placed across a 20 hectare deposition area, in order to raise the level of the site by 2 metres. The total amount of waste to be accepted at the facility over its 24-year lifetime is 373,039 m³, which is equivalent to approximately 600,000 tonnes of waste.

Lennon Quarries Ltd. contend that the current and proposed waste activities are exempt from planning permission under the Planning and Development Regulations, 2001, Schedule 2, Part 3 – Exempted Development – Rural, Class 11 – Land Reclamation ‘*Development consisting of the carrying out, on land which is used only for the purpose of agriculture or forestry, of any of the following works*’ – Sub-Class (b), ‘*Land Reclamation*’.

Having regard to the scale and duration of the activity (total capacity approximately 600,000 tonnes to be deposited over 24 years), and the fact that the projected annual acceptance of waste is just under the 25,000 tonnes threshold for Environmental Impact Assessment (disposal or recovery activity >25,000 tonnes requires an EIS in accordance with European Communities (Environmental Impact Assessment) Regulations 1989, as amended), the Agency requests a determination from the Planning Authority as to whether planning permission and/or an Environmental Impact Statement is required for the proposed development. You are requested to forward your response within four weeks of the date of this letter.

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The waste licence application is available to view on the Agency's website <http://www.epa.ie/whatwedo/licensing/waste/>. Please note the licence register number is W0256-01. I enclose a site location map and the non-technical summary of the waste licence application for ease of reference. If you have any queries, please contact Aoife Loughnane at 01 2680100.

Yours sincerely,

A handwritten signature in black ink that reads 'Aoife Loughnane'.

Aoife Loughnane

Inspector

Office of Climate, Licensing & Resource Use



WASTE LICENCE
APPLICATION
SITE BOUNDARY

NOTES

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
3. ENGINEER TO BE INFORMED BY THE CONTRACTOR OF ANY UNFORESEEN CIRCUMSTANCES BEFORE ANY WORK COMMENCES
4. ALL LEVELS & SPANS RELATIVE TO ORDNANCE SURVEY DATUM AT MALLEN HEAD

No.	Date	Drawn by	By	Check
1				
2				
3				
4				

Client: LENNON QUARRIES LTD.

Project: WASTE LICENCE APPLICATION

Title: SITE LOCATION MAP 1

Scale B A3 1 : 20,000

Prepared By: [Blank] Date: 17.12.08

R.I.C. MICHAEL F. GARRICK



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Drawing No: 2084-2600
Revision: A



ATTACHMENT A.1

Non-Technical Summary

A Non-Technical Summary of the Waste Licence Application, which complies with the requirements of Article 12 (1) (u) of the Waste Management (Licensing) Regulations, S.I. 395 of 2004 is presented below.

NON-TECHNICAL SUMMARY

This Waste Licence Application is being made by Lennon Quarries Ltd., Glencastle, Bunnahowen, Ballina, Co. Mayo, telephone 097 81297, fax 097 81734, email tlennon@lennonquarries.com. Lennon Quarries Ltd. is a body corporate, with its registered office at the above address. The company registration number is 263357. Lennon Quarries Ltd. are both the applicant and the operator of the facility, subject to this Waste Licence Application.

TOBIN Consulting Engineers (Contact – Dr. Emma Sweeney, Senior Environmental Scientist) ('TOBIN'), Market Square, Castlebar, Co. Mayo, telephone 094 9021401, fax 094 9021534, email emma.Sweeney@tobin.ie, have prepared this Waste Licence Application, on behalf of their client - Lennon Quarries Ltd. All correspondence relating to this Waste Licence Application should be directed towards TOBIN.

This application relates to a site at Tallagh, Belmullet, Co. Mayo, the location of which is shown on Drawing No. 2084-2600 and Drawing No. 2084-2601 (attached in 'Application Drawings', Tab 15). Two bench marks set up by TOBIN at the second entrance gate to the facility have the National Grid Reference E470040 N835694 (Bench Mark 1) and E470033 N835690 (Bench Mark 2), as shown on Drawing No. 2084-2603 (attached in 'Application Drawings', Tab 15). The site is owned by Erris Farm Services Co-Op Society Ltd., Chapel Street, Belmullet, but is on long-term lease to the applicant (Lennon Quarries Ltd.). The extent of the lands leased are shown on Drawing No. 2084-2602 (attached in 'Application Drawings', Tab 15).

The Waste Licence Application 'Site Layout Plan' is shown on Drawing No. 2084-2603 (attached in 'Application Drawings', Tab 15). The site has a total area of 27.22ha, which includes the site access road, the proposed area of

deposition (20.48ha) and a proposed buffer zone in the northern section of the site (4.46ha), which separates the area of deposition from the Clooneen River, which flows in an easterly direction, along the northern boundary of the site.

This Waste Licence Application is for a 'Material Recovery Facility' at the site. Material Recovery is presently ongoing at the application site, under the existing Mayo County Council Waste Permit PER 144 for the site, which was granted on 30 January 2006, in accordance with the relevant legislation at that time (Waste Management Act 1996 and the Waste Management (Permit) Regulations 1998). This permit expires on 29 January 2009.

The 1998 Waste Permit Regulations were revoked and replaced by the Waste Management (Facility Permit and Registration) Regulations 2007 and the Waste Management (Facility Permit and Registration) (Amendment) Regulations 2008 ('*New Legislation*'), which came into effect on 01 June 2008.

Under the *New Legislation*, the activity permitted under existing Waste Permit PER 144 does not fall within Part I of the Third Schedule, and therefore now requires a Waste Licence, in accordance with the Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004).

Therefore, it is not intended for Lennon Quarries Ltd. to submit a 'Waste Permit Review Application' with Mayo County Council. In compliance with the *New Legislation*, Lennon Quarries Ltd. are submitting this 'Waste Licence Application' with the EPA. The *New Legislation* requires that the 'Waste Licence Application' is lodged with the EPA within 180 working days of the coming into operation of the Waste Management (Facility Permit and Registration) Regulations 2007, (i.e. 13 February 2008), or before/on the expiry date of the existing Waste Permit (i.e. 29 January 2008), whichever is sooner. These dates have been confirmed by the EPA in a letter dated 16 October 2008.

By lodging the application within this timeframe, the existing Waste Permit (PER 144) will remain valid until such a time as the EPA either grant or refuse a Waste Licence. This interpretation of the legislation is also confirmed by the EPA in their letter dated 16 October 2008.

The Waste Licence Application Site is located within the functional area of Mayo County Council Planning Authority. However, the activities proposed to be carried out under this Waste Licence Application (and under the existing Waste Permit PER 144 for the site) are exempt from Planning Permission,

under the Planning and Development Regulations, 2001, Schedule 2, Part 3 - Exempted Development – Rural, Class 11 - Land Reclamation, Sub-Class (b): "Land Reclamation".

There is no discharge of trade effluent or other matter, to sewer (existing or proposed) from the Waste Licence Application site.

The works proposed under this Waste Licence Application involve the acceptance of a maximum of 24,900 Tonnes per annum of non-hazardous/inert material (as is presently the case under Mayo County Council Waste Permit PER144) and its recovery, by spreading the material over the site deposition area, with a consequential benefit of improving the land for agricultural use.

The wastes proposed to be accepted at the Waste Licence Facility fall under two main EWC Waste Categories (EWC 01 & EWC 17). A more detailed breakdown of the waste types proposed to be accepted at the Waste Licence Facility (and their corresponding EWC codes) is given below:

EWC 01

Waste Resulting from Exploration, Mining, Quarrying, and Physical & Chemical Treatment of Minerals: -

EWC 01 04 09

Waste Sand & Clay

EWC 01 04 10

Dusty & Powdery Wastes, other than those mentioned in 01 04 07

EWC 01 04 12

Tailings & Other Wastes from Washing & Cleaning of Minerals, other than those mentioned in 01 04 07 & 01 04 11

EWC 17

Construction and Demolition Wastes: -

EWC 17 01 01

Concrete

EWC 17 01 02

Bricks

EWC 17 01 03

Tiles & Ceramics

EWC 17 01 07

Mixture of Concrete, Bricks, Tiles & Ceramics, other than those mentioned in 17 01 06

EWC 17 05 04

Soil & Stones, other than those mentioned in 17 05 03

EWC 17 05 06

Dredging Spoil, other than those mentioned in 17 05 05

EWC 17 09 04

Mixed Construction & Demolition Wastes, other than those mentioned in 17 09 01, 17 09 02 & 17 09 03

It is proposed to accept 575 Tonnes/Month (6,900 Tonnes/Annum) of 'Waste Resulting from Quarrying, Activities' (wastes listed under EWC 01 above) and 1,500 Tonnes/Month (18,000 Tonnes/Annum) of 'Construction and Demolition Wastes' (wastes listed under EWC 17 above) at the Waste Licence Facility for recovery/reclamation.

The activity proposed in this Waste Licence Application is not an establishment to which the European Communities (Control of Major Accident Hazards involving Dangerous substances) Regulations, 2000 (S.I. No. 476 of 2000), will apply.

The class/classes of activity (in accordance with the Third Schedule or Fourth Schedule to the Waste Management Acts 1996 to 2003), to which this Waste Licence Application relates are presented below.

The '**Principle Activity**' to be undertaken is covered by:

Class 4 of the Fourth Schedule of the Waste Management Acts 1996 - 2003:

"Recycling or reclamation of other inorganic materials".

This application concerns the continuing recovery/reclamation (as it will replace Mayo County Council Waste Permit 144) of non-hazardous/inert material (i.e.: construction & demolition waste and waste resulting from quarrying) and its recovery, by spreading the material over the site area, with a consequential benefit for improving the land for agricultural use.

The proposed activities are also covered by:

Class 13 of the Fourth Schedule of the Waste Management Acts 1996 - 2003:

"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".

This activity allows for the storage of incoming non-hazardous/inert material (i.e.: construction & demolition waste and waste resulting from quarrying) before it is reclaimed by spreading the material over the site area.

Drawing No. 2084-2607 (Attached in 'Application Drawings', Tab 15) presents the '*Existing Topographic Map of Application Site*'. This application for a Waste Licence, proposes to raise the level of the site by 2m, by spreading out the accepted inert materials (24,900 Tonnes/Annum) over the surface of the 'Area of Deposition'. Drawing No. 2084-2608 - (Attached in 'Application Drawings', Tab 15), shows the '*Proposed Topographic Map of Application Site, Showing Final Ground Levels*' (i.e. with proposed 2m Land Raise shown). Cross Section Locations A-A, B-B, C-C, D-D & E-E are shown on Drawing 2084-2607 & Drawing No. 2084-2608 (Attached in 'Application Drawings', Tab 15), with the Cross Sections presented on Drawing No. 2084-2609, Drawing No. 2084-2610 & Drawing No. 2084-2611 (Attached in 'Application Drawings', Tab 15). The Cross Sections clearly show the Land Raise by 2m, with a slope of 3:1 down to all existing perimeter surface water drains, which will remain untouched. The existing open surface water drains that cut through the Area of Waste Deposition, will also be raised by 2m, as shown on the Cross Section Drawings.

To allow for a proposed 2m Land Raise, it was calculated that a total of 373,039m³ of material would have to be accepted/recovered at the facility. Using a density for Construction & Demolition Waste & Wastes from Quarrying Activities of 1.6 Tonnes/m³, it was calculated that 596,862.5 Tonnes Waste would have to be accepted at the facility for recovery/reclamation. Based on an annual intake of 24,900 Tonnes/Annum, it is calculated that the facility will be active for 24 Years (i.e. 2009 - 2032).

The 'Proposed Hours of Operation' for the facility are 8.00am to 6.00pm - Monday to Friday, 8.00am to 2.00pm - Saturday, and Closed on Sundays & Bank Holidays. The 'Proposed Hours of Waste Acceptance/Handling' are 8.30am to 5.30pm - Monday to Friday, 8.30am to 1.30pm - Saturday, and Closed on Sundays & Bank Holidays. The difference between the 'Proposed Hours of Operation' and the 'Proposed Hours of Waste Acceptance/Handling' reflect the time allowed for set-up and clean up works each day.

It is proposed to construct a concrete hardstand area within the waste deposition site, to the northeast of the entrance to the site, as shown on Drawing No. 2084-2612 (attached in 'Application Drawings', Tab 15). The proposed concrete hardstand area will be ca. 25m x 20m in size and will be constructed using 4" broken stone, overlain by 75mm sand, and ca. 150mm of reinforced concrete.

The concrete hardstand will have an 'Open Surface Water Drain' running within the perimeter of the slab, as shown on Drawing No. 2084-2612 (attached in

'Application Drawings', Tab 15). This will ensure that all surface water runoff from the concrete hardstand will be collected and directed towards a petrol interceptor, prior to discharge into the site surface water drainage system, as shown on Drawing No. 2084-2612 (attached in 'Application Drawings', Tab 15).

The facility accommodation (portocabin & portoloo) will be positioned on the hardstand, as shown on Drawing No. 2084-2612 (attached in 'Application Drawings', Tab 15).

Finally, three waste quarantine bays will be constructed on the concrete hardstand, as shown on Drawing No. 2084-2612 (attached in 'Application Drawings', Tab 15). The waste quarantine bays will be 6m x 4m in plan area, and will be simple block wall structures, ca. 2m in height.

Under the existing Waste Permit PER 144 for the facility (which has been active since January 2006, and will remain active until a decision is made on this Waste Licence Application) and under the proposed Waste Licence for the facility, only one piece of plant equipment will be used onsite. The Hitachi 200 excavator is being and will continue to be used intermittently throughout the day/week.

It is proposed to develop a hardcore area (with a surface dressing of clean broken stone), close to the entrance gate, as shown on Drawing No. 2084-2612 (attached in 'Application Drawings', Tab 15). This will allow haulage trucks to enter the site, turn, and deposit their material, along the perimeter of the hardcore area.

The Deputy Facility Manager/Machine Operative will inspect each load, as it is being deposited, to ensure the material is fully compliant with the Waste Licence. If the material is non-compliant, the Deputy Facility Manager/Machine Operative will insist that the material is reloaded onto the haulage truck and removed from the site, for authorised disposal elsewhere.

Once the haulage trucks deposit their material, along the perimeter of the hardcore area, the excavator will shift the inert material, from where it is deposited by the haulage trucks, and spread it over the area of the deposition site, in compliance with the Waste Licence Application Drawings (attached in 'Application Drawings', Tab 15). If waste objects are identified within the inert material (whilst shifting/reclaiming the material), which are not compliant with the Waste Licence (eg. pieces of wood, plastic, metal), they will be removed and transported to the Waste Quarantine Area.

The Deputy Facility Manager/Machine Operative will keep a record of all material arriving at the facility, including the following information:

- Date;
- Time;
- Owner Truck;
- Truck Licence Plate No.;
- Type of Material;
- Origin of Material;
- Quantity of Material.

It is not proposed to install a weighbridge at the facility. Based on the proposed annual intake of 24,900 Tonnes, it is expected that there will be approximately 1,245 truckloads of inert material delivered to the site on an annual basis (i.e. ca. 25 loads per week). This small quantity of truck arrivals does not justify the expense of installing a weighbridge. Also, all inert material arriving at the facility will be delivered in haulage trucks owned and operated by Lennon Quarries Ltd. (under Waste Collection Permit CW276, which is presently under review with Mayo County Council). The Deputy Facility Manager/Machine Operative on the Waste Licensed site will have a record of the capacity of each of the trucks, which will allow him to keep an accurate record of volumes/quantities of inert materials being accepted at the facility on a daily basis.

The only fuels required at the proposed Waste Licence Site will be Diesel (ca. 100 Litres/week) and Hydraulic Oil (ca. 40 Litres/Annum), to run the onsite plant (Hitachi 200 excavator) and the small generator required to provide electricity to the site accommodation (Portocabin). It is not proposed to store any fuel onsite. A fuel tanker will visit the site, when required and fill the onsite plant (Hitachi 200 excavator & small generator). The refuelling will be carried out on the proposed concrete hardstand. As stated above, all runoff from the hardstand area will be directed through a petrol interceptor, prior to discharge into the surface water drainage system.

Water will be provided to the facility (Portocabin) by tanker, and stored in a holding tank.

Raw Materials including broken stone, sand, concrete blocks and poured concrete will be accepted at the facility to complete construction of the proposed broken stone hardcore turning area for trucks (inside the main entrance gate) and for the proposed concrete hardstand area (base for

Portocabin, Portoloo, Waste Quarantine Area, and Machine Refuelling Area), as discussed above. These works are proposed to be completed within the first two working weeks of the Waste Licence being granted. Following these works, it is not expected that any other 'Raw Materials' will be accepted at the facility.

No chemicals (e.g. Insecticides, Herbicides, Rat Poisons, Cleaning Agents, Water Treatment Chemicals, Cooling Water/Boiling Water Additives, Laboratory Chemicals, etc.) will be required or accepted at the facility.

The only 'Energy' proposed to be used at the facility will be that to run the facility plant (Hitachi 200 excavator) and the generator (to provide electricity to the site Portocabin). To ensure energy efficiency, the facility plant engine will be switched off when not in use and the generator will only be used when absolutely necessary. Based on the above, it is anticipated that the proposed facility will be very energy efficient

There are/will be no emissions to sewer or groundwater from the facility. The only noise emission from the site will be the one piece of mobile plant (Hitachi 200 excavator). There are/will be 5 no. surface water emissions from site surface water drainage system to the Clooneen River and 1 no. surface water emission from the proposed petrol interceptor to the site surface water drainage system (as shown on Drawing No. 2084-2613, attached in 'Application Drawings', Tab 15). The only emissions to atmosphere will be from the exhaust of the mobile plant and haulage trucks arriving/departing the site, and of dust from the unloading, stockpiling and movement of the inert waste for recovery, around the site.

'Treatment, Abatement and Control Systems' are proposed to be put in place to ensure the above listed emissions from the facility will not result in the contravention of any environmental standard. These measures include: construction of 5 no. Settlement Ponds on all drainage channels prior to their discharge from the site, the installation of a petrol interceptor (both of which are shown on Drawing No. 2084-2614, attached in 'Application Drawings', Tab 15), the regular servicing of facility plant to ensure that noise and exhaust emissions are kept to a minimum, and the use of a tractor with water bowser to dampen down dust from the facility during periods of extended dry weather.

Monitoring of 'Surface Water' at 4 no. locations on the Clooneen River (including samples from upstream & downstream of the site) on a quarter yearly basis is proposed. Monitoring of 'Settlement Dust' at 3 no. locations around the

site boundary, on a biannual basis is proposed. Monitoring of 'Noise' at 3 no. locations around the site boundary, and at 2 no. noise sensitive locations (i.e. the two closest houses), is proposed on an annual basis. The locations of all proposed monitoring locations, are shown on Drawing No. 2084-2606 (attached in 'Application Drawings', Tab 15).

The main accidents of concern for the facility subject to this Waste Licence Application are an accidental fuel spillage, or a fire at the facility. Necessary measures to be taken to prevent these accidents occurring, and actions to be taken should an accident occur will be provided to all personnel on the site in the form of 'Accident Prevention & Emergency Response' Report.

Due to the simple process of material recovery/reclamation proposed for the facility, very little remediation or decommissioning will be required. The site is expected to revegetate naturally and abatement measures to ensure surface water leaving the site has a chance to settle (i.e. deposit suspended solids), in the form of 5 no. Settlement Ponds will be left in place following closure of the facility.

The Applicant - Lennon Quarries Ltd. is a 'Fit & Proper Person', complying with all of the requirements of Section 40(7) of the Waste Management Acts 1996 to 2003'

The applicant (Lennon Quarries Ltd.), or any person working for the applicant, have not been convicted of an offence under the Waste Management Acts 1996 to 2003, the EPA Act 1992 and 2003, the Local Government (Water Pollution) Acts 1977 and 1990 or the Air Pollution Act 1987.

Although Mr. Thomas J. Lennon and his employees (particularly those named in the 'Management Structure') have no direct qualifications in relation Waste Management, all have gained valuable technical knowledge through working in the area for many years, under the existing Mayo County Council Waste Collection Permit (CW276) and Waste Facility Permit (PER 144).

Lennon Quarries Ltd. are in a position to meet any financial commitments or liabilities that the Agency reasonably considers will be entered into or incurred by him or her in carrying on the activity to which the waste licence will relate in accordance with the terms thereof or in consequence of ceasing to carry on that

activity. A letter confirming the above from Lennon Quarries Ltd. bank is attached in the Waste Licence Application.