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Mr D Finch, Senior Engineer, South Dublin County Council, County Hall, Tallaght, Dublin 24

04<sup>th</sup> February 2010

Reg No: W0079-02

Dear Mr Finch,

I am to advise you that the Agency has received an application for a Waste Licence review from Greenstar Limited, for a facility located at Unit 41, Cookstown Industrial Estate, Tallaght, Dublin 24.

The applicant proposes, as part of this application, to continue to provide for the discharge of process effluent to a sewer, which the applicant has stated is vested in, or controlled by, your Council. Process effluent includes trade effluent or other matter (other than domestic sewage or storm water). I enclose copy extracts from the application form, which detail proposed discharges.

The provisions of Section 52 of the Waste Management Acts, 1996 to 2008, provides that the Agency shall obtain the consent of the sanitary authority to the proposed discharge from an activity which involves the discharge of trade effluent or other matter (other than domestic sewage or storm water), to a sewer vested in or controlled by a sanitary authority.

In order to expedite the Agency's consideration of this waste licence application, I am to request your authority's consent to the proposed discharge/s. It should be noted that, your authority's consent may be subject to such conditions as your authority considers appropriate as provided for in Section 52 of the Waste Management Acts, 1996 to 2008 and Section 99E(3) of the Environmental Protection Agency Acts, 1992 and 2007. Your attention is drawn to paragraphs (3) and (4) of the attached copy of the relevant section of the Act. For your convenience please find attached a reply form including a list of draft conditions compiled by the Agency.



In accordance with paragraph (2) of this section of the Act, you are requested to forward your response within 5 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the Agency may proceed to determine the application concerned as if consent was obtained. Marian Doyle is dealing with this matter and can be contacted at the Licensing Unit, Office of Climate, Licensing & Resource Use (Tel. No. 01 2680100) if you have any queries.

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Your co-operation in this matter is appreciated.

Yours sincerely,

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Patrick Morris Programme Officer Licensing Unit Office of Climate, Licensing & Resource Use

#### Section 99E (3) & (4) of the Environmental Protection Agency Acts, 1992 and 2007

- (3) Subject to subsection (4), a consent under subsection (1) may be granted subject to or without conditions and if it is granted subject to conditions the Agency shall include in the licence or revised licence concerned conditions corresponding to them or, as the Agency may think appropriate, conditions more strict than them.
- (4) The conditions that may be attached to a consent by a sanitary authority under this section are the following and no other conditions, namely conditions-
  - (a) relating to-
    - (i) the nature, composition, temperature, volume, level, rate, and location of the discharge concerned and the period during which the discharge may, or may not, be made,
    - (ii) the provision, operation, maintenance and supervision of meters, gauges, manholes, inspection chambers and other apparatus and other means for monitoring the nature, extent and effect of emissions,
    - (iii) the taking and analysis of samples, the keeping of records and furnishing of information to the sanitary authority,
  - (b) providing for the payment by the licensee to the sanitary authority concerned of such amount or amounts as may be determined by the sanitary authority having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent and other matter to sewers in its functional area or a specified part of its functional area,
  - (c) specifying a date not later than which any conditions attached under this section shall be complied with,
  - (d) relating to, providing for or specifying such other matter as may be prescribed.

# SANITARY AUTHORITY RESPONSE re: SECTION 52 OF THE WASTE MANAGEMENT ACTS, 1996 to 2008

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Name & Address of Sanitary Authority:

Waste Reg. No.

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Waste Facility: South Dublin County Council, County Hall, Tallaght, Dublin 24

Waste Licence Applicant: Greenstar Limited

Consent: Indicate Yes to one of the following statements:

W0079-02

Consent granted subject to the consent	
conditions outlined below	
Consent granted without conditions	
Consent refused Note 1	

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Note 1 Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

	GENERAL CONSENT CONDITIONS	Condition to be included (Yes/No)
1.	No specified emission from the installation shall exceed the emission limit value set out in <i>Schedule B: Emissions Limits to Sewer</i> . There shall be no other emission to sewer of environmental significance.	
2.	The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as out in <i>Schedule C</i> .	
3.	Monitoring and analytical equipment shall be operated and maintained as necessary so that monitoring accurately reflects the discharge or emission.	
4.	The licensee shall permit authorised persons of the Agency and the Sanitary Authority to inspect, examine and test, at all reasonable times, any works and apparatus installed, in connection with the process effluent, and to take samples of the process effluent.	
5.	All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.	
6.	The licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.	,
7.	The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and to off-site points as required by the Agency.	
8.	The licensee shall at no time discharge or permit to be discharged into the sewer any liquid matter or thing which is or may be liable to set or congeal at average sewer temperature or is capable of giving off any inflammable or explosive gas or any acid, alkali or other substance in sufficient concentration to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer.	
9.	In the event of any incident which relates to discharges to sewer, having taken place, the licensee shall notify the Agency, Local Authority and Sanitary Authority as soon as practicable after the incident.	

	ADDITIONAL GENERAL CONSENT CONDITIONS in respect of discharges or emissions to sewers, in accordance with Section 52 of the Waste Management Acts, 1996 to 2008 (specify, if required)
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## Limit Values for Process Effluent to Sewer

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#### Schedule B: Emission Limits

Waste licence application Register No. W0079-02

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Emission Point Reference No:

Emission to (sewer description):

Volume to be emitted: Maximum in any one day: \_\_\_\_\_ m<sup>3</sup>

Maximum rate per hour: \_\_\_\_\_ m<sup>3</sup>

Parameter (delete parameters which are not applicable)	Emission Limit Value		
црисаону	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)	
BOD			
COD			
Suspended Solids			
РН			
Temperature			
ADDITIONAL PARAMETERS (if required)			

# Frequency of Monitoring Process Effluent to Sewer

## Schedule C

Waste Liœnce application Register No. **W0079-02** 

Emission Point Reference No:\_\_\_\_\_

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<b>Parameter</b> (delete parameters which are not applicable)	Monitoring Frequency (e.g. monthly, quarterly, annually)	Sampling Type (grab, composite)	
Flow to sewer			
Temperature			
рН			
BOD			
COD			
Suspended Solids			
ADDITIONAL PARAMETERS (if required)			
<u></u>			

SANITARY AUTHORITY CHARGES			
Charge per cubic metre of process effluent (per s52 of			
the Waste Management Acts, 1996 to 2008)			
Payment Frequency			
Annual Monitoring Costs			

Signed on behalf of South Dublin County Council

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Date\_\_\_\_\_



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# SECTION B GENERAL

B.I Applican	t's Details
Name*:	Greenstar Ltd.
Address:	Unit 6 Ballyogan Business Park,
	Ballyogan Road
	Sandyford,
	Dublin 18
Tel:	01-2947900
Fax:	01-2947990
e-mail:	

\* This should be the name of the applicant which is current on the date this Waste Licence Application is lodged with the Agency. It should be the name of the legal entity (which can be a limited company or a sole trader). A trading/business name is not acceptable.

## Name and Address for Correspondence

Only application documentation submitted by the applicant and by the nominated person will be deemed to have come from the applicant.

Name:	Mr. Malcolm Dowling
Address:	Unit 6 Ballyogan Business Park,
	Ballyogan Road
	Sandyford,
<u>,</u>	Dublin 18
Tel:	01-2947900
Fax:	01-2947990
e-mail:	

# Address of registered or principal office of Body Corporate (if applicable)

Address:	Burton Court,
	Burton Hall Road,
	Sandyford,
<u></u>	Dublin 18.
Tel:	
Tel: Fax:	
e-mail:	

If the applicant is a body corporate, the following information must be attached as Attachment B1:

- a) a Certified Copy of the Certificate of Incorporation or Memorandum and Article of Association;
- b) the Company's Registration Number from the Companies Registry Office; and
- c) a list of the Company Directors.

# **INTRODUCTION**

Greenstar Ltd (Greenstar) is applying to the Environmental Protection Agency (Agency) for a review of the Waste Licence for its Materials Recovery Facility at Unit 41, Cookstown Industrial Estate, Tallaght, Dublin 24 (W0079-01). The objective of the review is: -

- To allow for the change of the principal activity from Class 13 of the Third Schedule to Class 3 of the Fourth Schedule of the Waste Management Acts 1996 to 2008;
- To allow for the acceptance of metal wastes arising from commercial enterprise and households;
- To allow for the external processing and storage of metals;
- To allow for the acceptance of End of Life Vehicles.

The format of the application is based on the requirements of Parts II and III of the Waste Management (Licensing) Regulations 2004 (2004 Regulations) and in particular Articles 5, 6, 7, 9, 12 and 13.

- Oil filters will be removed, the oil will be separated out and the filters will be compressed and sent to an approved facility;
- The vehicles will then be removed from the ELV shed and crushed using a Lefort baler externally. The de-polluted ELV bales/hulks will be stored on site and exported to approved facilities in the UK mainly;
- All components and liquids removed from the vehicles will be weighed out, as will the car hulks;
- A certificate of destruction will be issued for every vehicle de-polluted and MSM Recycling will carry out all relevant reporting as required by the Agency for the National Vehicle File.

# Ancillary Processes & Abatement Systems:

# Foul Water

The changes to the site activities will not alter the existing sanitary wastewater drainage arrangements. There will be no change to the process wastewater discharges from the facility. The existing licence specifies that the drainage from the floor of the main transfer building and a vehicle wash should discharge to the municipal foul sewer. Vehicle washing is not carried out at the facility, as it is no longer required.

The current Licence specifies that run-off from the open yard areas can be discharged to a separate municipal surface water sewer. Although the metals accepted at the facility are inert, some pieces can have traces of oil on their surfaces, which present a potential risk of contamination of surface water run-off. The surface water drainage system has therefore been changed, with the approval of the Agency, to ensure that all run-off from the main working yard area passes through silt traps and a Class 2 Bypass Separator before discharge to the municipal foul sewer.

Drawing IE502-002 shows the current drainage arrangements and a description of the improvement works is presented in the IE Consulting Engineers report in Appendix 3. In addition, a surface water management maintenance schedule has been put in place to ensure regular checking, clearing and cleaning of manholes, gullies and the Bypass Separator.

# Surface Water

As runoff from the main process yard is now directed to the municipal foul sewer, runoff to the municipal surface water sewer is now limited to rainfall from the roof of the transfer building and the part of the site near the southern boundary, which is not used for waste activities. (Refer to Drawing IE502-002).

# Weighbridge and Offices

The weighbridge records all vehicle movements into and out of the site. The administration offices are block work buildings. The proposed review not will alter the existing weighbridge or administration arrangements.

Parameter	Units	SW-1 March 2006	SW-1 August 2006
Oils, Fats Grease	mg/l	1	<1
COD	mg/l	140	<15
TSS	mg/l	3580	<1
Ammoniacal Nitrogen	mg/l	4.2	0.6

#### Table 1 Surface Water Monitoring Results 2006

Surface water monitoring was carried out on the 18<sup>th</sup> May 2009 on the discharge from the facility to the municipal surface water sewer and before the drainage system was altered to connect to the foul sewer. This includes rainfall run off from the roofs and the southern area of the site, which is not used for waste activities. The parameters list was expanded to include pH, BOD, Mineral Oil and Electrical Conductivity. The results are summarised in Table 2 and the laboratory report is included in Appendix 4.

Table 2 includes, for comparison purposes, emission limit values set in other Waste Licences. Although the total suspended solids limit was higher than the typical limit, the overall quality of the discharge was relatively good. The cause of the elevated suspended solids was dust on the paved yards, although it may have been contributed to by disturbance of sediment in the sample chamber while sampling.

Parameter	Units	SW-1	ELV/Trigger Level Set in Standard Licence
pH	pH Units	8.23	
Ammoniacal Nitrogen	N mg/l	0.17	
BOD	mg/l	5	25
COD	mg/l	39	
Total Suspended Solids	mg/l	114	35
Oils, Fats & Greases	mg/l	< 0.01	
Mineral Oils	mg/l	< 0.01	5
Conductivity	mS/cm	0.597	

#### Table 2 Surface Water Monitoring Results May 2009

## **Foul Water Monitoring**

#### Prior to Site Drainage Upgrade

The Licence requires quarterly foul water sampling at two sampling locations E-1 and E-3. Wastewater monitoring resumed in Q1 2009. The range of analysis was as specified in Schedule C.2 of the Waste Licence and included pH, temperature, ammoniacal nitrogen, biochemical oxygen demand, chemical oxygen demand, total suspended solids, oils, fats and greases, surfactants and sulphate. The results are summarised in Table 3 and all the parameters complied with the Emission Limit Values.

Parameter	Units	<b>E</b> 1	E3	Waste Licence No. W0079-01 Emission Limit Value
рН	pH Units	7.44	7.36	6 to 10
Temperature	°C	3.4	3.9	42°C
Ammoniacal Nitrogen	N mg/l	2.20	0.50	70
BOD	mg/l	7	9	2,000
COD	mg/l	85	44	4,000
Total Suspended Solids	mg/l	97	40	700
Oils, Fats & Greases	mg/l	2.126	3.319	100
Surfactants	mg/l	0.7	0.8	100
Sulphate	mg/l	32.26	32.37	1000

# Table 3 Foul Water Monitoring Results – February 2009

Following the upgrade to the drainage system, foul water samples were collected on the 18<sup>th</sup> May 2009 and 3<sup>rd</sup> September 2009, at the location shown on Drawing 3. The discharge incorporates the runoff from the floor of the transfer station building and rainfall runoff from the open yard where processing is carried out. The results are summarised on Table 4 and the laboratory report is included in Appendix 4. The levels detected were all significantly less that the Emission Limit Values.

Parameter	Units	SE1 May 2009	SE-1 September 2009	Waste Licence No. W0079-01 Emission Limit Value
рН	pH Units	8.26	7.81	6 - 10
Ammoniacal Nitrogen	N mg/l	1.78	13.5	70
BOD	mg/l	65	2.37	2,000
COD	mg/l	350	43	4,000
Total Suspended Solids	mg/l	122	201	700
Oils, Fats & Greases	mg/l	4.027	41	100
Surfactants	mg/l	3.4	0.237	100
Sulphate	mg/l	299.72	0.5	1,000
Mineral Oils	mg/l	0.201	142.90	
Conductivity	mS/cm	2.06	<0.01	

# Table 4 Foul water Monitoring Results - May 2009

#### **Noise Monitoring**

Noise monitoring was carried out within the site boundary bi-annually since the Licence was issued in 2000 until the facility closed in 2005. There are no noise emission limit values specified in the Licence with the exception of tonal noises at the facility boundary and there is no requirement to monitor at off site noise sensitive locations. This reflects the Agency's monitoring requirements at the time the Licence was issued in 2002 and which has

that is not practicable, to limit or abate such emissions, is presented here. Existing control of environmental emissions at the facility are BAT.

## Surface Water

The volume of surface water discharged to the municipal surface water sewer has been reduced, as a large portion of the open yard area is now directed to the municipal foul sewer. The diversion of the run-off to the sewer was carried out to comply with the Agency's requirements and given that vehicle washing and floor washing is no longer carried out there should not be any significant change to volumes discharged to sewer. The discharge to the surface water sewer is now limited to rainfall on the building roofs roof and a part of the site along the southern boundary.

The current Licence does not require surface water monitoring, however it is proposed to carry out monitoring quarterly. In addition, a surface water management maintenance schedule has been put in place to ensure regular checking, clearing and cleaning of manholes, gullies etc.

The change in site activities and the drainage system has significantly reduced the potential for surface water contamination.

#### Foul Sewer

The current Licence allows drainage from the floor of the main transfer building and a vehicle wash to discharge to the municipal foul sewer. Vehicle washing is no longer carried out and runoff from the main process yard area has been directed to the foul sewer. Monitoring has confirmed that the discharge complies with the Emission Limit Values.

A surface water management maintenance schedule has been put in place to ensure regular checking, clearing and cleaning of manholes, gullies and the Bypass Separator. It is considered likely that the quality of the discharge to the sewer will improve due to the change in operations and that the volumes will be within the limits set in the existing licence. The change in drainage arrangements will therefore have, at worst, an imperceptible impact on the sewer and may potentially have a positive impact.

#### Dust

It is considered likely that the operations will have an imperceptible impact on dust levels in the vicinity of the facility. Monitoring carried out while the facility was closed identified off site sources of dust contributing to elevated levels measured on-site. The site is located in a industrial area and the sensitivity of adjoining lots in the industrial estate to dust impacts is limited.

The facility implements dust suppression measures including yard cleaning and damping down the yard in dry weather conditions.

# 6. NON TECHNICAL SUMMARY

This non-technical summary contains the information specified in Article 12 (1) (u) of the Waste Management (Licensing) Regulations, 2004 (S.I. No. 395 of 2004).

Articles 12 (1) (a) to (d)

Greenstar Ltd. (Greenstar) Unit 6, Ballyogan Business Park, Ballyogan Road, Sandyford, Dublin 18 is applying to the Environmental Protection Agency (EPA) for a review of Waste Licence W0079-01 at Cookstown Industrial Estate Tallaght Dublin 24.

The purpose of the review is to allow for the change of the principal activity from storage of waste to metals recovery, to allow for the acceptance of metal wastes arising from commercial enterprise and households, to allow for processing and storage of metals outside the building and to allow for the recycling of scrap cars and vans. South Dublin County Council is the relevant sanitary authority.

#### Compliance with Requirements of the Waste Management Act 1996 to 2003

Best Available Techniques (BAT) will be used to prevent, eliminate or, where this is not possible reduce to a minimum the impact of site activities on the environment.

# Article 12 (1) (e) Nature of the Facility

The current Licence, which was issued in January 2000, allowed the operator to accept Commercial and Industrial (C&I) and Construction and Demolition (C&D) waste, including metals. Up to 145,000 tonnes of waste can be accepted annually, broken down into 43,500 tonnes of C&I waste and over 100,000 tonnes of C&D waste.

In 2006, it had been Greenstar's intention to close the site and surrender the Licence. However, due to subsequent changes in market conditions, Greenstar decided to retain the facility. In November 2008 Greenstar agreed to lease the facility to a scrap metal operator-Midland Scrap Metal Ltd (MSM), who started working at the site in December 2008. Only metal wastes are taken in at the site and it is not proposed to take the other wastes authorised under the current licence. It is intended to take scrap cars and vans.

# Article 12 (1) (f) Classes of Activity

The relevant activities as per the Fourth Schedule of the Waste Management Acts 1996 – 2003 will be as follows: -

# Third Schedule – Waste Disposal Activities

Class 13: Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.

# Fourth Schedule – Waste Recovery Activities

Principal Activity:

Class 3: Recycling or reclamation of metals and metal compounds (P).

Class 13: Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

WASTE TYPE	TONNES PER ANNUM (existing)	TONNES PER ANNUM (proposed)		
Household	0	5,000		
Commercial	23,500	25,000		
Sewage Sludge		· · · · · · · · · · · · · · · · · · ·		
Construction and Demolition	100,000	10,000		
Industrial Non- Hazardous Sludges				
Industrial Non- Hazardous Solids	20,000	10,000		
Hazardous (End of Life Vehicles)		10,000		

# Article 12 (1) (g) Quantity and Nature of the Waste to be Recovered or Disposed

# <u>Article 12 (1) (h) Raw and Ancillary Materials, Substances, Preparations, Fuels &</u> <u>Energy used on the Site</u>

Energy Stream	Annual Quantity	Units	Period	Estimate 12 Month Period
Electricity	7,000	kWh	December 2008	75,000
Heating Oil	260	Litre	December 2008	1,600
Diesel	1,800	Litre	December 2008	19,000

#### Table 12(1)h: Estimate of Resources Used On-Site 2008

# Article 12 (1) (i) Plant, Methods, Processes, Abatement, Recovery, Treatment and Operating Procedures

The principal activity is metals recovery, which involves separating the metals into the different types, cutting and baling and then sending the bales to overseas smelters. It is proposed to de-pollute scrap vehicles which will involve taking out the batteries, hydraulic and lubricating oils, coolants and petrol/diesel and then crushing the vehicle.

The metals come from construction and demolition sites, industries that make and use metal products, other waste recovery facilities, and households and businesses. All deliveries are thoroughly inspected to make sure that unsuitable wastes are not accepted. As the operator pays for all of the materials he takes in it is in his interest to only take materials that he can sell on. Any unsuitable materials that are found are sent to the appropriate disposal site and the person who produced it is billed for the disposal cost.

It had been the intention that all of the metals would be handled inside the main building, but this cannot be done safely due to the size of the processing equipment and therefore some metals are processed outside the building. The scrap vehicles will be cleaned out and crushed inside the building. The equipment used includes a shears, baler cutters, cable stripper and fork lifts.

# <u>Article 12 (1) (j) Information Related to Section 40(4) (a) to (g) of the Waste</u> <u>Management Act</u>

Emissions from the facility, including noise, will not contravene any relevant standard or emission limit set in the current legislation, nor will they cause environmental pollution. The activity is consistent with the Dublin Region Waste Management Plan and operations are based on guidance published by the Agency.

The Facility Manager and Deputy will complete appropriate training programmes for example the FAS Waste Management Training Programme.

Energy will be used efficiently and measures will be taken to prevent accidents that could impact on the environment. If the site has to close, the closure will be done in accordance with a Plan agreed with the Agency to ensure that pollution is avoided.

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# Article 12 (1) (k) Source, Location, Nature, Composition, Quantity, Level and Rate of <u>Emissions</u>

Actual and potential emissions to the environment include surface water, foul water, dust and noise. The monitoring programme specified in the Licence includes foul water, dust and noise monitoring and in addition monitoring of surface water run-off was carried out in May 2009.

#### Surface Water/ Foul Water

The surface water drainage system has been changed to redirect rain fall in the open yard where the metal is handled to the foul sewer. An oil interceptor has been installed on this drain. The only rainwater that now goes to the surface water sewer is from the roofs and the section of the yard not used for metal handling. The surface water monitoring in May 2009 found that the water entering the surface water sewer was generally of good quality, although the amount of sediment was higher than expected.

The discharge to foul sewer includes the runoff from the floor of the building and rainwater from the section of the open yard where metal is handled. The monitoring carried out in May and September 2009 confirmed that the quality of the discharge complied with the Licence requirements.

## Noise

Noise monitoring has been carried out within the site boundary bi-annually since the Licence was issued in 2000. The nearest noise sensitive location is Tallaght Hospital, which is approximately 200m away and was unlikely to have been affected by the noise from the site.

Since the site reopened, three noise monitoring surveys have been carried out. These included both the site boundary locations specified in the Licence and Tallaght Hospital. The surveys were completed in December 2008 and again in February and May 2009.

The monitoring confirmed that noise levels from the current activities are not a cause of nuisance at the Hospital. The monitoring has also shown that the existing noise levels at the site boundary locations are generally lower than those recorded in 2005 and that there are significant offsite sources of noise, which is not unexpected given the commercial and industrial nature of the surrounding area. The site has not received any complaints about noise since it re-opened.

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November 2009 (MW/MG)

#### Dust

Dust monitoring has been carried out monthly from the time the Licence was issued in 2000. The monitoring identified that dust deposition levels regularly exceeded the limits set in the Licence. The site closed in April 2006 and the monitoring carried out between May 2006 and January 2007 continued to find high dust levels at the monitoring locations. This indicates that the dust sources within the industrial estate were contributing to the high levels measured when the site was operational.

Since the site reopened dust monitoring has been carried out monthly from January to August 2009 at three locations. The dust deposition limit was exceeded at one monitoring location on the northern boundary in January, March, April, May, June and July. Following the implementation of dust mitigation measures the results improved and were below the limits in August and September 2009. The levels recorded in the other two locations consistently complied with the limit. The other activities in the Industrial Estate are sources of dust and are most likely to be contributing to the levels recorded at the site. There have been no complaints about dust emissions from the site.

# <u>Article 12 (1) (1) Details and Assessment of the Effects of Emissions on the Environment & Mitigation Measures</u>

#### Surface Water

The metal and scrap vehicle processing will not result in any new discharge to surface water. The volume of rainwater run-off to the surface water sewer has been reduced as most of the open yard now drains to the foul sewer. Recent monitoring has found that the run-off is generally of good quality. The current Licence does not require surface water monitoring, but the Licensee proposes to do so four times a year. In addition, a surface water management plan has been prepared that covers regular checking, clearing and cleaning of manholes, gullies and the oil separator.

#### Foul Sewer

The foul water drainage system has been changed. The current Licence allows for drainage from the floor of the main building and a vehicle wash to discharge to the municipal foul sewer. Vehicle washing and floor wash downs are no longer carried out and rainfall on the main process yard has been directed to the foul sewer. The monitoring of the discharge has confirmed that it complies with the limits set in the Licence.

# Dust

The current and proposed operations have not and will not have any measurable impact on dust levels in the vicinity of the facility. Monitoring carried out while the site was closed found that dust levels measured at the site continued to exceed the limits set in the Licence. The site is in a commercial/industrial area and the sensitivity of adjoining lots in the industrial estate to dust impacts is limited. The operator has a dust control plan which includes regular yard cleaning and damping down the yard in dry weather.

#### Noise

Noise monitoring carried out after the site reopened has shown that noise levels are not impacting on the nearest noise sensitive location, Tallaght Hospital. There are no other noise sensitive locations within 400m of the facility. The current noise levels are also generally lower at the site boundary than those recorded before the site temporarily closed in 2006.

## Article 12 (1) (m)Monitoring and Sampling Points & Consequences of such emissions

#### Dust

Dust will be monitored monthly at three locations on the property boundary.

## Noise

Noise will be monitored twice a year at the nearest noise sensitive location and site boundary locations.

## Surface Water

The surface water discharge from the oil separator will be monitored four times a year. As the discharge will be linked to rainfall and therefore not continuous, grab samples will be collected.

#### Waste Water

The wastewater discharge from the oil water separator will be monitored four times a year basis. As the discharge will be linked to rainfall and therefore not continuous, grab samples will be collected.

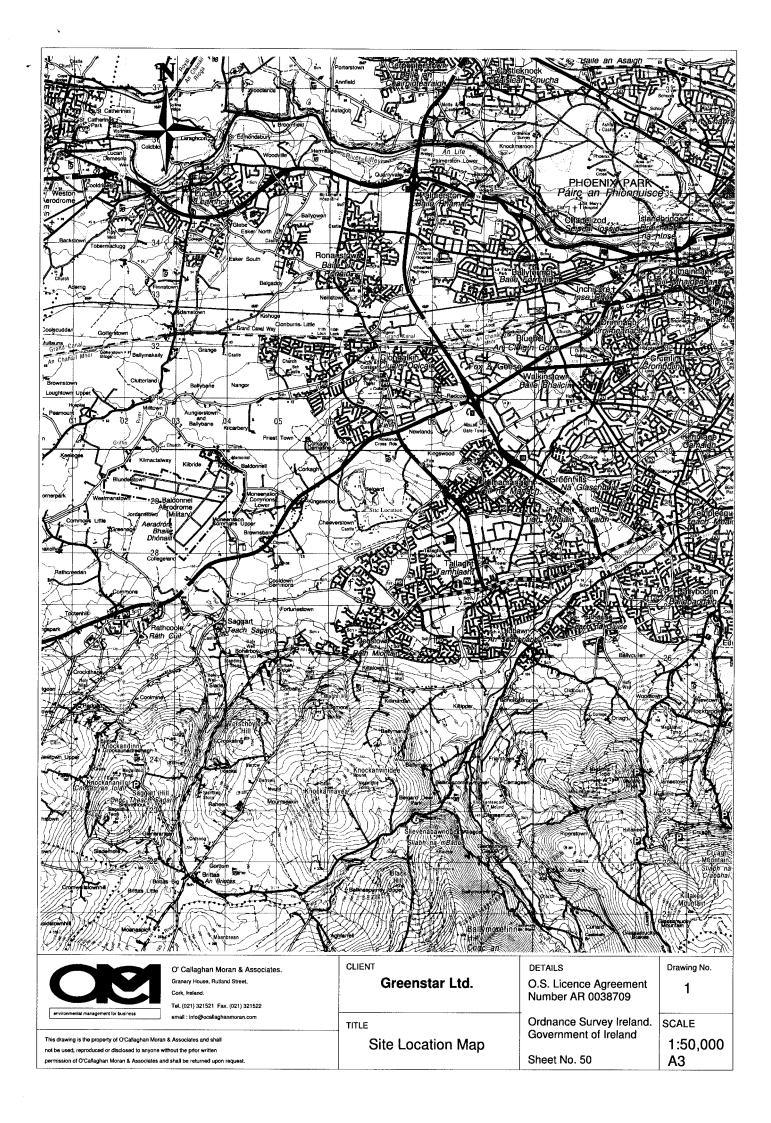
The effects of the emissions have been described in Article 12 (1) (l) above.

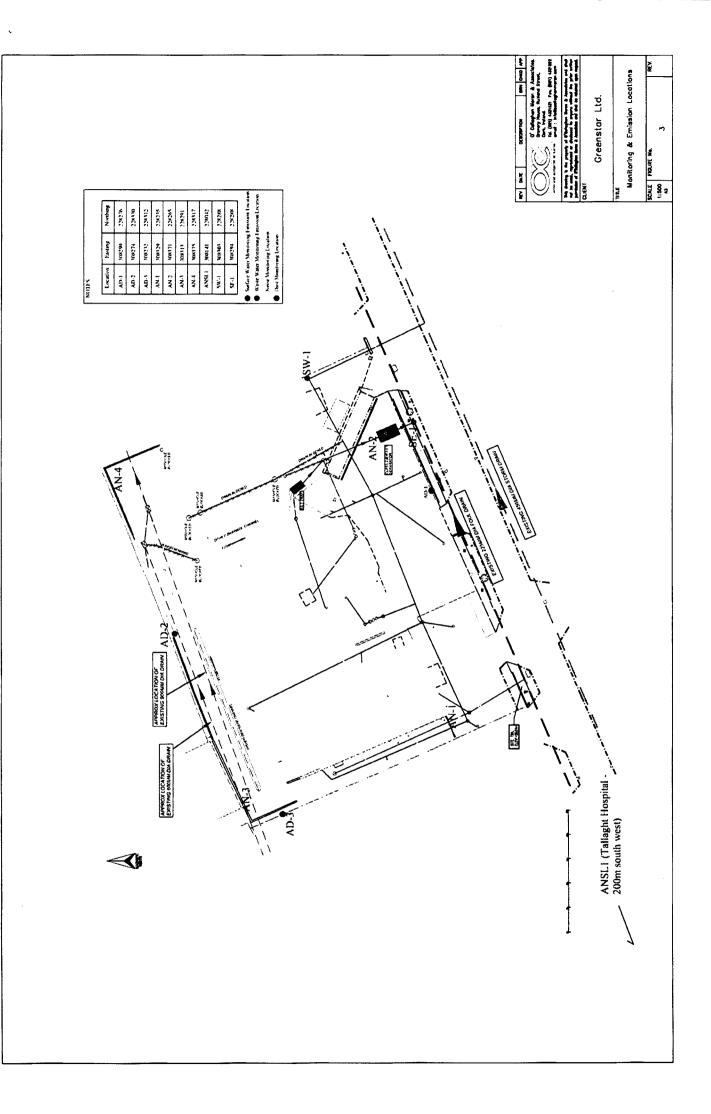
# Article 12 (1) (n) Prevention and Recovery of Waste

Waste oils and batteries recovered during de-pollution of the scrap vehicles will be collected and sent off-site for recovery.

# Article 12 (1) (o) Off-site Treatment or Disposal of Solid or Liquid Wastes

Wastewater from the site offices, canteen and toilets and run-off from the yard area is discharged to the foul drainage system. This drainage system is connected to the Council's foul sewer.





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