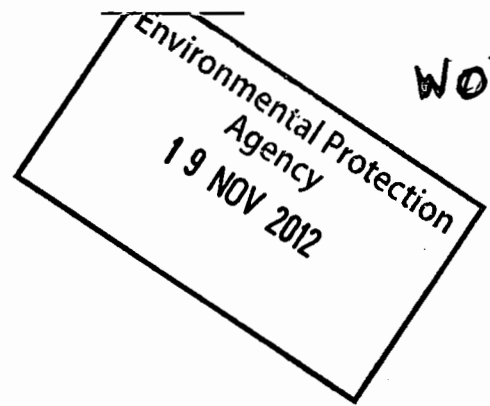




patel tonra ^{td}
environmental solutions



W0279-01

For the Attention of
Environmental Protection Agency
c/o Head of Office of Climate, Licensing
and Resource Use
EPA Headquarters
PO Box 3000
Johnstown Castle Estate
Co. Wexford

Our Ref.: RG0202/Consult
Direct Dial: 01 8020523
Direct Fax: 01 8020525
e-mail: louise.odonnell@pateltonra.com
Date: 16th November 2012

Dear EPA,

Re: Scoping Consultation on Remedial Environmental Impact Statement for Rehab Glassco Ltd., Unit 4, Osberstown Industrial Park, Caragh Road, Naas, Co. Kildare

Introduction

Patel Tonra Ltd. is writing to you in the capacity of environmental advisors to Rehab Glassco Ltd., who operates a glass recycling facility at Unit 4, Osberstown Industrial Park, Caragh Road, Naas, Co. Kildare (location map attached). The facility has been operated as a glass recycling facility since 2008, in accordance with a number of planning permissions and under permit from Kildare County Council¹.

About Rehab Glassco Ltd.

Rehab Glassco is part of Rehab Enterprises, Ireland's largest single non-Government employer of people with disabilities. Over 400 people are employed by Rehab Enterprises, more than half of whom have a disability, where the emphasis is on ensuring that people with disabilities play a full role in society, while managing a business that is financially sustainable. Rehab Enterprises is a division of the Rehab Group, which has a proud 60-year tradition of providing high-quality services across Ireland, England, Scotland, the Netherlands and Poland.

Rehab Glassco Ltd. offers a nationwide collection and recycling service for all types of waste glass and cans. The waste input to the Rehab Glassco facility in Osberstown comprises of materials collected at the bring bank network throughout the country, as well as collections of segregated glass/metals from commercial and other sources. The recycling facility uses advanced technology to sort glass into three separate colours, processes colour-segregated glass and produces a glass cullet product, which is dispatched off-site for use in the manufacture of new bottles and jars.

The Rehab Glassco facility plays a critical role in the recycling and recovery of glass in the context of the Irish waste management sector; the operation of this facility makes a substantive contribution towards meeting Ireland's recycling and recovery targets for glass.

Application to An Bord Pleanála

Rehab Glassco Ltd. is making an application to An Bord Pleanála (ABP) for substitute consent under Section 177C of the Planning and Development (Amendment) Act 2010². The application will be accompanied by a Remedial Environmental Impact Statement (REIS).

¹ Waste Facility Permit Ref. No. WFP-KE-08-0357-01

² An Bord Pleanála granted Rehab Glassco Ltd. leave to apply for substitute consent on 17th September 2012: ABP Reference No. 09.LS.0003

The requirement for a substitute consent application and REIS is on the basis of a waste recovery activity being carried out on site, which involves greater than 25,000 tonnes of input material per annum. The application seeks to regularise the existing development under the substitute consent provisions.

Remedial Environmental Impact Statement

'Remedial environmental impact statement' is detailed in section 177F of the Planning and Development (Amendment) Act 2010 as follows:

- "177F.— (1) A remedial environmental impact statement shall contain the following:*
- (a) a statement of the significant effects, if any, on the environment, which have occurred or which are occurring or which can reasonably be expected to occur because the development the subject of the application for substitute consent was carried out;*
 - (b) details of—*
 - (i) any appropriate remedial measures undertaken or proposed to be undertaken by the applicant for substitute consent to remedy any significant adverse effects on the environment;*
 - (ii) the period of time within which any proposed remedial measures shall be carried out by or on behalf of the applicant;*
 - (c) such information as may be prescribed under section 177N."*

Description of the Facility

The physical elements of the facility are as follows (see attached drawing):

- The site area is 21,300m².
- Main Process building – a portal frame structure; dimensions: 41.26m x 17.79m, 12m maximum height. The purpose-designed Main Process building contains the recycling plant for the segregation and processing of glass (and small volumes of other recyclables) for recovery purposes. This is the principal activity carried out on site. Offices, staff canteen and toilets are also contained within the Main Process building.
- Drying Plant building - a steel-framed, fabric-covered structure; dimensions: 19.46m x 16.14m, 8.34m maximum height. The Drying Plant building houses a rotating drying unit, with associated conveyor, bagging and ancillary equipment. This building is used to manufacture a specified product from reject glass for remanufacturing uses.
- Vehicle Maintenance building - a steel-framed, fabric-covered structure; dimensions: 19.4m x 12.4m, 7.0m maximum height. The building is used for maintenance of Rehab Glassco vehicles only; no third party vehicles.
- Vehicle parking, internal access routes and outdoor storage areas. A wayleave associated with the Newbridge Rising Main runs along the north-eastern boundary of the site.
- Ancillary activities and infrastructure, including weighbridge, truck wash, foul and surface water management infrastructure (including interceptors and underground attenuation tank), fuel storage, security gates and boundary fencing.
- All of the above features are existing and operational at the time of writing.

- The construction of a storm-water attenuation pond (approximately 75m long x 5m wide x 1.2m deep) is proposed to be constructed in the east of the site, as a remedial measure, and in line with a previous planning condition. No additional built infrastructure, construction works or commissioning are proposed as part of this application. Potential environmental impacts associated with construction activities are therefore limited to the construction of the storm-water attenuation pond.

The proposed intake at the facility is up to 98,000 tonnes of material per annum.

The proposed hours of operation are: 24-hours, Monday to Sunday, including bank holidays. The proposed hours of waste acceptance are: 07:00 (7am) to 19:00 (7pm), Monday to Saturday, including bank holidays.

The facility is the subject of a Waste Licence Application to the Environmental Protection Agency (EPA). The application was submitted in July 2011.

Rehab Glassco directly employs 85 staff.

Site Context

The site is located within Osberstown Industrial Park, which is currently not fully occupied. The adjoining land uses are as follows:

- North-eastern site boundary: Kildare County Council Osberstown Wastewater Treatment Plant.
- South-eastern site boundary: 'Double L' [business name], Units 6 & 7, Osberstown Industrial Park, comprising industrial unit, public display area, car park and external storage area. The business involves the storage, display and sale of concrete and granite products.
- South-western site boundary: Vacant lot at Unit 3, Osberstown Industrial Park; Elsatrans Ltd., a freight and logistics company, is located at Unit 12, Osberstown Industrial Park; there is a storage shed situated on lands adjacent to Unit 12. There is a residential property to the west of the Rehab Glassco Ltd. site; the house is approximately 40m from the Rehab Glassco boundary (at the closest point).
- North-western site boundary: vacant site.

The site is designated 'NE 1: Industry/Warehousing' under the Kildare County Development Plan 2011-2017.

The River Liffey flows in a west-east direction and is located approximately 120m to the north of the subject site (at the closest point).

There is a proposed Natural Heritage Area (NHA) (site name: 'Liffey at Osberstown') approximately 0.22km north-east of the subject site (from the closest boundary location). There are no other designated sites within 1km of the subject site.

Structure of the Remedial Environmental Impact Statement (REIS)

The REIS will be prepared with due regard to the provisions of the Planning and Development (Amendment) Act 2010, EU and national legislation on EIS and EPA guidance on EIS published in 2002 and 2003³. The REIS will use the following chapter headings:

- Non-technical Summary
- Introduction
- Project Description
- Human Beings
- Roads and Traffic
- Air, Climate and Radiation
- Noise and Vibration
- Landscape
- Flora and Fauna
- Soils, Geology and Hydrogeology
- Surface Water
- Archaeological, Architectural and Cultural Heritage
- Material Assets
- Cumulative Impacts, Other Impacts and Interactions

Comments on the Remedial Environmental Impact Statement (REIS)

Should you wish to make a comment on items for consideration in the REIS, we would be pleased to receive your feedback. We respectfully request that any comments are returned by **Friday, 30th November 2012** to: louise.odonnell@pateltonra.com or

Louise O'Donnell, Director, Patel Tonra Ltd., Environmental Solutions,
3f Fingal Bay Business Park, Balbriggan, Co. Dublin.

Should you wish to discuss any matter by telephone, or require any additional information, please call 01-8020520.

Yours Sincerely
for Patel Tonra Limited



Louise O'Donnell
Director

³ EPA (2003) *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)* and EPA (2002) *Guidelines on the Information to be contained in Environmental Impact Statements*

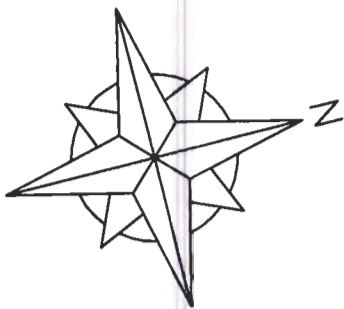
Site Location – Proximity to Naas



Site Location – Local Setting



Source: osi.ie



REV.	DATE.	AMENDMENT.	INITIALS.

CLIENT: **REHAB GLASSCO**

PROJECT: **OSBERSTOWN BUSINESS PARK, NAAS.**

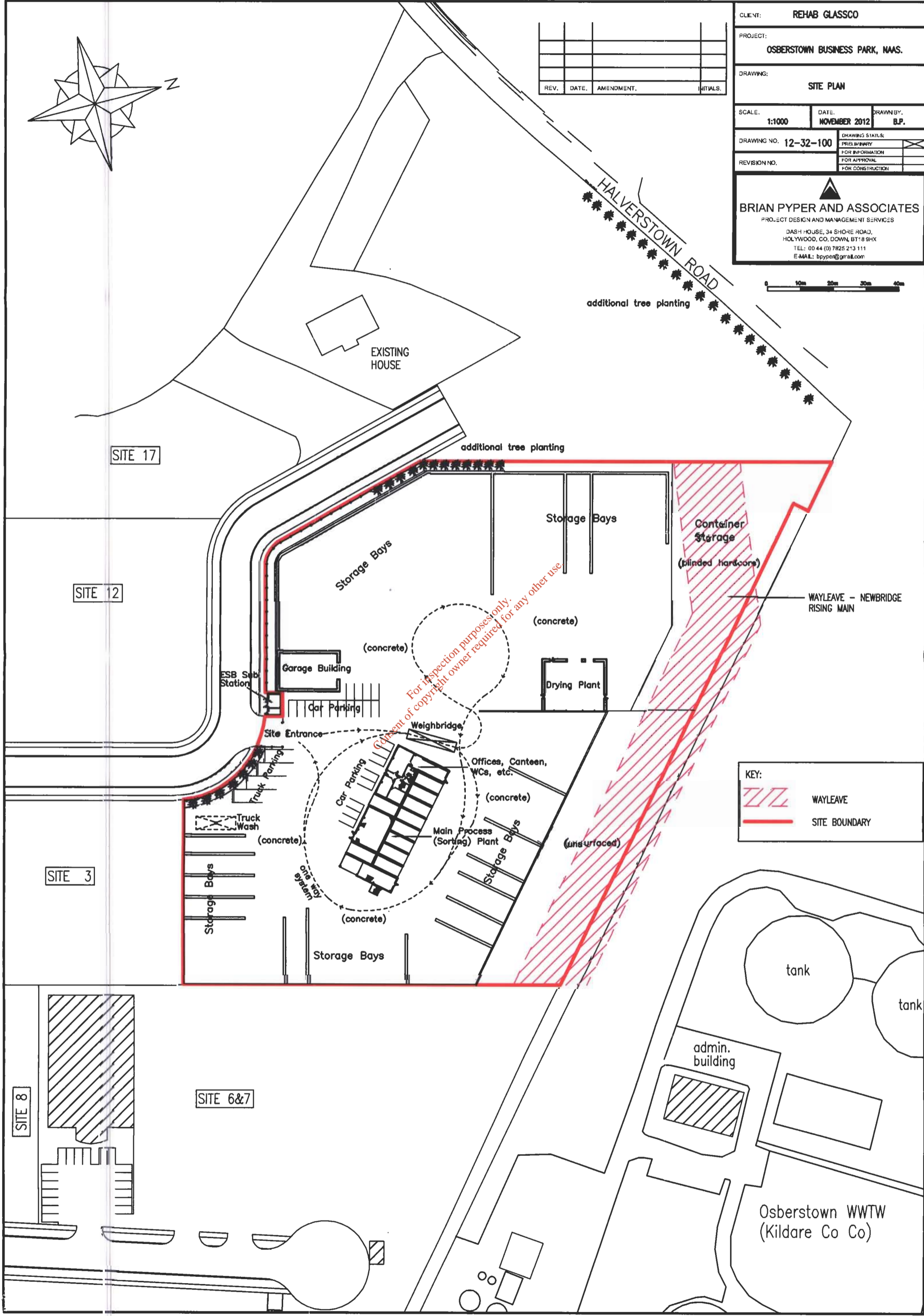
DRAWING: **SITE PLAN**

SCALE: **1:1000** DATE: **NOVEMBER 2012** DRAWN BY: **B.P.**

DRAWING NO. **12-32-100** DRAWING STATUS: PRELIMINARY
 FOR INFORMATION
 FOR APPROVAL
 FOR CONSTRUCTION

REVISION NO.:

BRIAN PYPER AND ASSOCIATES
 PROJECT DESIGN AND MANAGEMENT SERVICES
 DASH HOUSE, 34 SHORE ROAD,
 HOLYWOOD, CO. DUBLIN, BT18 9HX
 TEL: 00 44 (0) 7825 213 111
 E-MAIL: bpyper@prra.com



KEY:

WAYLEAVE

SITE BOUNDARY