



3.1 SUMMARY OF SCOPING OF EMISSIONS AND POTENTIAL ENVIRONMENTAL IMPACTS

3.1.1 Introduction

This section of the EIS summarises the screening and scoping process that determines and identifies those emissions and potential impacts that the subject matter of the review of Waste Licence W0256-01 may have on the environment (EPA ref: W0256-02).

An EIS may not need be a long and exhaustive document, rather it should be a focussed and concise report that focuses on the main issues.

At a meeting between the Soil Recovery Association of Ireland (SRA) and the EPA on 12th June 2008 it was stated by Dr. Jonathan Derham of the Agency:

"If you look at the agency guidelines on doing EIS there is very clear guidance... that the EIS should be scoped appropriately to the scale and risk activity.....you really focus your EIS and scope it according to the reasonably anticipated risks of the activity and they can be very narrow and very focused documents..."

Therefore accordingly, this section of the EIS scopes the activity based on the reasonably anticipated risks that this low risk activity may pose on the environment and set out those areas which need to be reasonably covered in a concise and focussed manner.

3.1.2 Sources of Information for Scoping

The scoping of this EIS makes reference to the original Waste Licence Application for W0256-01 and to the application for a review of Waste Licence (W0256-02) lodged in August 2012.

It also encompasses the decision making process of the Agency in processing and approving the issuing of the Waste Licence.

It also refers to the on-going day to day operation of the soil recovery facility; compliance monitoring of environmental parameters; and summaries of any complaints or incidents associated with the site (of which there are none).

It also refers to compliance with conditions of Waste Licence W0256-01 as a measure of assessing any potential impacts upon the environment by the continued operation of the licensed soil recovery facility.

3.1.3 Summary of Scoping

The proposal to increase the permitted annual tonnage of soils and stones at the licensed soils recovery facility at Tallagh, Belmullet, Co. Mayo by Lennon Quarries Ltd. from 24,900 tonnes to 90,000 tonnes per annum is acceptable and reasonable and very straight forward based on the present availability of suitable fill material from nearby large infrastructural projects.



The Agency was satisfied in granting Waste Licence W0256-01 that the recovery activity would not have any detrimental impact upon the environment. Furthermore, the Agency put strict and onerous conditions on the operator to ensure that this remained the case. The site operator has at all times adhered with these conditions and the site is fully compliant with its waste licence.

The content of the licence review is straight forward and this opinion was shared by the Agency on 16/1/2013. The potential impacts from the proposal to increase the annual tonnage from 24,900 tonnes to 90,000 tonnes poses no change in the scope of the activity, the nature of the activity or potential emissions from the activity (as presently licensed).

- The development sequence will still be to fill the site progressively (as presently licensed).
- The lands are presently marginal agricultural land and will be restored using imported soil and stones to more productive agricultural land thereby having a consequential benefit to agriculture (as presently licensed).
- The exact same proposed activity will occur as licensed i.e. a total of 265,000 tonnes of soil and stones but over a shorter time span (i.e. ca. 2.5 – 3 years). The activity will just take a shorter time span to complete and fully restore to beneficial agricultural use.
- The site survey drawings submitted with the Waste Licence Review remain unaltered as there will be no change whatsoever in the proposed topographical levels based on the reclamation of the site occurring over a shorter time period. Therefore there is no change to finished site survey drawings.
- Therefore the proposed review creates no proposed change to the content, nature, composition or volume of materials intended for recovery by deposition at the site, and the overall tonnage of 265,000 tonnes for which the existing license was issued remains unaffected.

With regards to potential impacts relating to Surface Water and dust, the proposed proposals in the licence review to increase the annual tonnage from 24,900 to 90,000 tonnes provides **an environmental gain**.

The phasing and restoration of the site will occur over a much shorter time period thereby speeding up the process by which the lands are seeded; stabilised and put back into productive agriculture. This obviously minimises the potential for sedimentation of surface waters (not withstanding the control measures already in place) and it provides even greater compliance with Condition 6.11.3: *Developed areas shall be seeded as soon as practicable after placement of cover soils, in a manner appropriate to the surrounding area and in any event in accordance with condition 10.2.2.*

Lennons Quarries Ltd. have the support of the local community with regards to the matters contained in the review of the waste licence. This is in the form of letters of support for the



proposed increase in annual tonnage from all the nearest residential dwellings (which would be considered the nearest potential noise and dust sensitive receptors).

Furthermore, there is the full support of the local GAA Club, an adjoining land-use and a major part of the local rural community. Finally, Lennon Quarries have a letter of support from the Fisheries Board for the proposed changes. Therefore Lennon Quarries Ltd. have demonstrated to the Agency that the licence review is supported by the local community as being a positive and pro-active step with environmental gains and benefits.

The site has been up and running since January 2006 under a Waste Permit and under a Waste Licence for the past ca. two years without any complaints or enforcement issues as proven by Agency records. Furthermore, the compliance monitoring is all up to date and is all compliant with the license requirements. All in all, we would consider that the existing soil recovery facility is operated as an extremely well run and well-monitored licensed facility.

With regard to road traffic, we consider this is a matter that has already been dealt with by Mayo County Council Planning Department in issuing confirmation that the proposed review of the waste licence remains exempted development under planning. Furthermore, and as outlined by Michael Henry of the Agency (*pers. comm.*) does not come within the remit of the Agency.

Notwithstanding this, the licence review will not result in any extra traffic than what has been occurring for the last two years, but will merely allow Lennon Quarries to keep the site open for 12 months of the year instead of the present 3-4 months time frame in which the annual tonnage allowances are reached. Road traffic accessing the licensed facility has created no difficulties or complaints and no nuisance to the surrounding area to date and will not do so in the future as part of the review of the Waste Licence.

3.1.4 Emissions and Potential Impacts from the Recovery Activity

From scoping the existing recovery activity and the content of the licence review and in particular Sections E.1 - E.6 of the application for the Review the potential Emissions associated with the facility have been clearly identified.

The scoping concludes that, as currently licensed, the main emissions from the facility are to Surface Water at 5 no. locations (surface water drains - EMSW-1, EMSW-2, EMSW-3, EMSW-4 & EMSW-5) and there will be no change in this regard in the application for a Review of the Waste Licence.

There are Noise Emissions from one item of plant onsite, (Hitachi 200 excavator) and a fugitive/minor emission to the atmosphere from the exhaust of this machine.

Dust produced by the unloading of material from the haulage trucks, and the subsequent movement/spreading of Soil and Stone over the area of the deposition site is discussed in relation to dust as a potential environmental nuisance rather than a site emission.

The Treatment/Abatement/Control System which manages the emissions to surface water are discussed in this EIS in Section 2.4.8 and **Figure 2.4b** - Per requirements of Licence



W0256-01, 5 no. Settlement Ponds have been put in place on the drainage channels, prior to their emission to the main surface water body (Clooneen River). The purpose of these Settlement Ponds is to allow suspended solids drop out of solution, prior to the surface water discharging from the site, into the Clooneen River.

Emission from the mobile plant (i.e. Hitachi 200 excavator) (Noise & Exhaust) are managed by ensuring that the machine is serviced regularly in order to ensure that exhaust emissions are kept to a minimum, and that the engine produces the lowest noise levels possible, and this will be maintained.

It is proposed to manage the potential environmental nuisance caused by dust by bringing a tractor with water bowser onto site during extended periods of dry weather, to sprinkle water over hardcore areas and the access road, to dampen down any dust.

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