



**OFFICE OF ENVIRONMENTAL
SUSTAINABILITY**

ENVIRONMENTAL LICENSING PROGRAMME

TO:	Dara Lynott, Director	
FROM:	Michelle Reddy	Environmental Licensing Programme
DATE:	10 August 2016	
RE:	Technical Amendment to Industrial Emissions Licence Register Number: W0277-01, held by Roadstone Limited, Fortunestown, Tallaght, Dublin 24.	

The Agency received a request on 4th May, 2016 from Roadstone Limited, Licence Reg. No. W0277-01 to technically amend their Licence. The request relates to Schedule A of the Waste Licence which states: 'A.1 Waste Acceptance Maximum (Tonnes Per Annum) 750,000'. The licensee has requested an increase in inert soil waste intake for recovery from a current maximum of 750,000 tonnes per annum to 1,500,000 tonnes per annum.

1. Background

Roadstone Limited was granted a licence; Reg No W0277-01, on 11th February 2015 for an installation located at Huntstown Inert Waste Recovery Facility, Huntstown Quarry, Finglas, Dublin 11. There has been no technical/clerical amendment of the existing licence since.

The installation is licenced under *Class R 3, Class R 5 (P), Class R 13* of the First Schedule to the 1992 EPA Act as amended. The principal activity is backfill of an exhausted quarry void using imported natural soil and stone. The total amount of material to be used to backfill the quarry is 7,295,000 tonnes of which 7,200,000 tonnes will be imported.

2. Technical Amendment request

On the 4th May, 2016, the Agency received a request for a Technical Amendment of Waste licence W0277-01, in order to allow an increase in tonnage of inert soil waste intake for recovery.

The licensee has sought authorisation to increase inert soil waste acceptance to 1,500,000 tonnes per annum (from the now authorised 750,000 tonnes per annum). The licensee states that there is a significant market demand for soil recovery capacity in the Greater Dublin area which is being generated by increasing levels of activity in the construction and development sectors. The licensee also states that there is limited soil recovery capacity in the Greater Dublin area to meet current and predicted levels of demand.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE Inspector, Cathal Gahan, in relation to this technical amendment request. The OEE confirmed that the proposal cannot be accommodated under the existing licence.

4. Assessment

The Environmental Impact Assessment carried out by the Agency was for a facility with a proposed maximum intake of 750,000 tonnes of inert soil waste per annum. The potential environmental impact of doubling this intake has not been assessed and cannot be so assessed as part of a technical amendment request. Also, given the scale of the proposed increase, there might be public interest in the proposal.

5. Recommendation

Given that no environmental assessment, including EIA and appropriate assessment if relevant, has been completed for a facility with a proposed intake of 1,500,000 tonnes per annum, and given the potential for public interest in such a change to the licensed activity, I recommend refusal of the technical amendment.

Signed,



Inspector
Environmental Licensing Programme