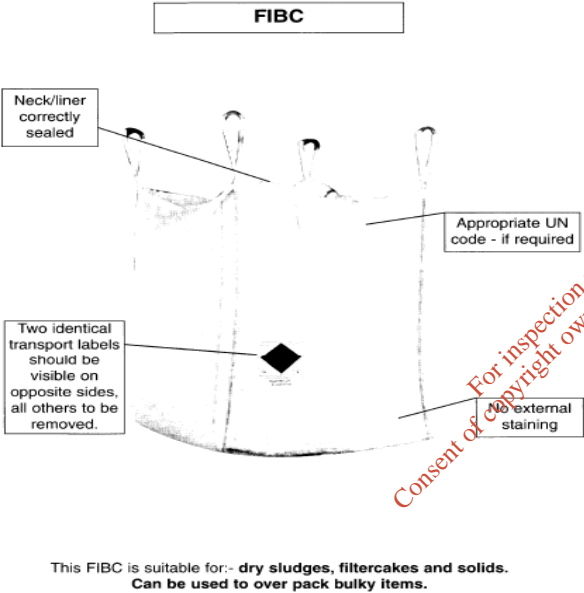


**ATTACHMENT 3: Review of 2002 EIS in context of Technical Amendment Request (2016)**

| EIS Subject                               | EIS 2002 Page Number | Relevant Excerpts from 2002 EIS  | Confirmation of no increase in emissions or associated impacts as a result of requested changes  |
|---|----------------------|--|--|
| Pinciple Elements of Development          | Pg. 57               | <ul style="list-style-type: none"> <li>• <u>Main warehouse building</u> to be used for the <u>handling and bulking of waste prior to onward transport to relevant recycling/recovery/disposal facilities</u>;</li> <li>• <u>Site infrastructure including a weighbridge, transfer building, office building, access road and car parking facilities</u>;</li> <li>• <u>Hazardous waste storage facilities</u>;</li> <li>• <u>3 tanker parking bays</u>; and</li> <li>• <u>Landscaping</u>.</li> </ul>  | <p>This excerpt highlights that the original application envisaged the handling of hazardous materials in the transfer building for bulking prior to onward transport to relevant recovery facilities.</p> <p>It is also noted that the bulking-up of ash residues is comparable to the handling and bulking up of contaminated soils for shipping overseas. Such contaminated soil waste streams were considered in the original 2002 waste licence application. As the handling of ash residues will be undertaken as a closed process, the handling of bulk contaminated soils has a greater potential to give rise to fugitive emissions.</p> <p>It is therefore considered appropriate to accommodate ash residues by way of technical amendment.</p> |
| Proposed activities in Transfer Building  | Pg. 57               | <p><i>The transfer station building will facilitate the following activities:</i></p> <ul style="list-style-type: none"> <li>• <i>Waste Reception</i></li> <li>• <i>Waste Inspection</i></li> <li>• <i>Waste Quarantine</i></li> <li>• <i>Waste Sorting</i></li> <li>• <u>Waste bulking and repackaging</u></li> <li>• <i>Waste Storage</i></li> <li>• <i>Waste Transportation off-site to waste recovery, recycling and disposal facilities</i></li> </ul>  | <p>The requested changes in the TA include waste bulking, repackaging and transportation off site.</p> <p>Such activities were assessed in the original EIS and waste licence application</p>  |
| Potential Waste streams considered In EIS | Pg. 60 & Appendix 2  | <p><i>Waste oil, oil filters, asbestos, oil/sand mixtures of oil and other material, wood preservation waste, wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal, waste from inorganic chemical processes, wastes from organic chemical processes, agrochemic wastes, infectious healthcare waste, photographic processing waste, paint, inks adhesives and resins, batteries and accumulators, florescent tubes and other mercury containing waste, contaminated soil, waste electronic and electrical equipment, laboratory waste, contaminated clothing, spent carbon and hydrocarbon waste</i></p> | <p>The requested changes to accommodate ash waste residue are comparable to wastes previously assessed in the original waste licence application, which included the bulking up and transfer of contaminated soils. asbestos wastes and wastes from inorganic and organic processes.</p>   |
| Typical handling/repackaging techniques   | Pg. 70               | <p><i>Bulk liquid to IBC</i><br/> <i>Bulking up and repackaging</i><br/> <i>Drum up</i><br/> <i>Bulk to coffin containers</i><br/> <i>Baling</i><br/> <i>Shredding</i><br/> <i>Storage for shipment in ASPs (Soils)</i><br/> <i>Washing, baling, crushing and shredding</i><br/> <i>Bulking for recycling</i></p>  | <p>The requested changes include bulking up, pre-packaging, and storage for shipment (e.g. contaminated soils). Such activities were previously assessed in the original waste licence application.</p>  |

| EIS Subject                   | EIS 2002 Page Number        | Relevant Excerpts from 2002 EIS  | Confirmation of no increase in emissions or associated impacts as a result of requested changes   |
|-------------------------------|-----------------------------|--|---|
| Contaminated soils transfer   | Pg.81                       | <p><i>'Contaminated soil will include any material generally not suitable for landfilling in Ireland. It may include soils contaminated by hydrocarbons, other oils and metals. It is proposed to provide a transit route at the facility for further treatment.</i></p> <p><i>This waste will be transported and handled in containers suitable for transport</i></p> | <p>As highlighted in the cover letter to this TA, the ash waste residue is material 'not generally suitable for landfilling in Ireland'. It is material containing metals and other compounds, and the requested changes include a provision of a transit route from the W0185-01 facility for further treatment.</p> <p>In addition, the waste will be transported and handled in containers suitable for transport (laminated FIBCs)</p> <p>Such activities were assessed in the original waste licence application.</p>  |
| Waste Transportation off site | Pg. 81 & Appendix 5, Vol. 3 |  <p style="text-align: center;">This FIBC is suitable for:- <b>dry sludges, filtercakes and solids.</b><br/>Can be used to over pack bulky items.</p>  | <p>The requested changes include the transportation of hazardous materials in laminated FIBCs.</p> <p>Such packaging activities and types were assessed in the original waste licence application.</p>  |
| Human beings                  | Pg.91                       | <p><i>There are no hospitals, holiday accommodation or hotels within 1km of the site. The nearest schools are in Newcastle and Rathcoole, some 1.7 km and 2km away respectively. There is a Montessori school approx. 687m to the south east.</i></p> <p><i>Table 5.1: Nearest dwellings are &gt;368 metres from Site</i></p>  | <p>There have been no significant changes in the existing environmental setting since 2002. The W185-01 licensed facility is located in an industrial park (Greenogue Industrial Estate), which has not seen any significant changes in terms of local population and residential housing since its development in 2001 to 2005.</p> <p>As such, no increase in emissions or associated impacts on human beings are envisaged as a result of the requested changes.</p> <p>It is also noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no complaints from residences or the local business community.</p> |

| EIS Subject | EIS 2002 Page Number | Relevant Excerpts from 2002 EIS   | Confirmation of no increase in emissions or associated impacts as a result of requested changes   |
|-------------|----------------------|---|---|
| Traffic     | Pg. 99               | <p><i>Average weekly number of vehicles expected to travel to and from the transfer station from Monday to Saturday is 312.</i></p> <p><i>The transport element of the proposed development is not expected to create any safety problems as long as appropriate access arrangements are maintained at the site entrance. The access road to the site is via a specially constructed road for the industrial estate.</i></p> <p><i>The increase in traffic (less than 1%) along the R120 public access road would have no significant impact on the amenity of residents and surrounding landowners in the area</i></p> | <p>The bagging operations (28,000t) and other ongoing waste transfer operations (5,000t) is predicted to generate approx.75 vehicle movements (HGVs and staff combined) vehicle movements per week. This equates to a reduction of approx. 75% of the amount of traffic originally proposed and assessed in the 2002 EIS (312 vehicle movement were assessed in the original EIS that accompanied the licence application).</p> <p>As such, no increase in emissions or associated impacts on traffic are envisaged as a result of the requested changes.</p> <p>It is also noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no traffic-related complaints received.</p>  |
| Noise       | Pg. 101              | <p><i>All process activities will be conducted within the waste transfer station building therefore the will be no significant impact on the local environment</i></p>  | <p>Sound power levels and associated equipment/processes used for the 2002 assessment included shredder running empty (70dBA), Soft Plastics (90dBA), Brittle plastics (101dBA) and Metals (96dBA).</p> <p>For the requested changes (i.e. bagging activity), noise will not exceed 80dB(A) at 1.0 metre from the operator, which is significantly lower than the plant proposed and assessed in the 2002 EIS (some plant exceeding 100dB(A).)</p> <p>Furthermore it is noted that this bagging activity under TA consideration will occur indoors, which is in keeping with Section 5.3.1 of the 2002 EIS.</p> <p>Regarding noise from traffic movements, the proposal under TA consideration will result in less than 75 vehicle movements per week. This is c.75% reduction in the number of vehicle movements originally considered in the 2002 noise impact assessment.(312 vehicle movements were used in original application).</p> <p>As such, no increase in emissions or associated impacts on the noise environment are envisaged as a result of the requested changes.</p> <p>It is also noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no noise-related complaints received.</p> |

For inspection purposes only. Consent of copyright owner required for any other use.

| EIS Subject              | EIS 2002 Page Number | Relevant Excerpts from 2002 EIS   | Confirmation of no increase in emissions or associated impacts as a result of requested changes  |
|--------------------------|----------------------|---|--|
| Air                      | Page 101             | <p><i>Only approved and permitted contractors will deliver waste to site in dedicated enclosed vehicles. The vehicles involved will not have travelled over muddy areas at any stage. Vehicles travelling to and from the transfer station will not soil the roads</i></p> <p><i>All the handling of waste will be conducted indoors.</i></p> <p><i>All vehicles servicing the transfer station will be adequately covered. This will mitigate any potential nuisance associated with litter and odour</i></p>  | <p>All deliveries of ash residue will be in purpose built (dedicated enclosed) powder tankers, using only paved roads at all times.</p> <p>All handling (delivery, bagging, storage and onward shipment) will be conducted indoors, as envisaged in the 2002 Licence Application, using comparable plant and handling processes as detailed in the 2002 EIS.</p> <p>Details of mitigation measures and monitoring for ash residue are included in the attached Golder Report entitled 'Detailed Report on Requested Changes to W0185-01', and associated TA Request</p> <p>As such, no increase in emissions or associated impacts on the air environmental are envisaged as a result of the requested changes.</p> <p>It is noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no dust or odour complaints received.</p>  |
| Geology and Hydrogeology | Pg. 105              | <p><i>It is not anticipated that the development will have any impact upon the geology of the area. Groundwater will not be extracted as part of this development. The development of the site will not affect the level of the groundwater table. The foul sewer generated at the site will be connected into the existing services. There will not be a discharge to the subsurface regime which could impact upon groundwater. Mitigation measures are not required</i></p>  | <p>The bagging and storage activities will be undertaken in the main transfer building only. No activities are proposed to be undertaken outdoors. Further it is noted that as the bagging activity is effectively a closed system with no emissions.</p> <p>As such, no increase in emissions or associated impacts on geology/hydrogeology are envisaged as a result of the requested changes</p> <p>It is noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no groundwater-related complaints received.</p>  |
| Surface water            | Pg. 110              | <p><i>It is intended that the physical transfer of all waste will be conducted under the roofed conditions. The mitigation measures to be employed at the site to protect the quality of the surrounding surface water bodies include leachate minimisation, control of stormwater run-off, foul water management and emergency control procedures</i></p> <p><i>Spill control: Waste to be handled onsite will generally be dry, and will be transported to the site in fully enclosed or covered vehicle. The sorting and bulking of waste will taken place inside the transfer building. The floor of this building will be constructed of concrete incorporating coating/flooring and will be sloped to an intermittent sump. Wastewater from inside the building will be collected in a sump for disposal off site</i></p> | <p>The bulking and storage of ash residue will take place inside the transfer building. The material will be dry and transported to the site in fully enclosed and purpose built vehicles (powder tankers).</p> <p>The bagging process will not require or produce any water as it is a dry bulking handling activity, which is in keeping with Best Available Technology (BAT) from the Emissions from Storage (2006)</p> <p>As the transfer building was purpose built for the handling of hazardous waste materials, it remains an appropriate flooring material for the activities under consideration in this TA.</p> <p>As such, no increase in emissions or associated impacts on surface water are envisaged as a result of the requested changes.</p> <p>It is noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no surface water-related complaints received.</p> |

| EIS Subject       | EIS 2002 Page Number | Relevant Excerpts from 2002 EIS   | Confirmation of no increase in emissions or associated impacts as a result of requested changes   |
|-------------------|----------------------|---|---|
| Cultural Heritage | Pg. 120              | <i>It is not expected that there will be any negative impacts on the archaeological sites in the area as a result of the development</i>  | <p>No archaeological sites were impacted on during the initial development of the site.</p> <p>As the bagging and transfer activities will happen within an existing transfer building, with no intrusive works, there can be no impacts on the cultural heritage or archaeology as a result of these activities being considered for TA.</p> <p>As such, no increase in emissions or associated impacts on cultural heritage are envisaged as a result of the requested changes.</p>   |
| Ecology           | Pg. 123              | <i>The site will be changed from an agricultural site to an industrial one. As the site is of low conservation value however, this is not considered to be a significant negative impact.</i>   | <p>No changes will occur to the existing building or hardstanding footprint. All bagging and transfer activities will be undertaken indoors, as originally envisaged in the 2002 EIS.</p> <p>As such, no increase in emissions or associated impacts on the ecological environment are envisaged as a result of the requested changes.</p> <p>It is noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no ecology or surface water-related complaints received.</p> <p>In addition, an Appropriate Assessment Screening Report has been undertaken which confirms that there are no likely significant adverse effects on the qualifying interests of the conservation objectives of any designated European Site (This Report is attached to this TA submission)</p> |
| Landscape         | Pg. 128              | <p><i>The site boundaries will be planted with Screening vegetation to minimise the visual impact</i></p> <p><i>The colours and materials to be used on the facades of the building will blend in with those of the newly constructed industrial estate adjacent to the site.</i></p> | <p>No changes will occur to the existing building or hardstanding footprint. All bagging and transfer activities will be undertaken indoors, as originally envisaged in the 2002 EIS.</p> <p>In addition, no changes will be made to the existing landscaping/screening vegetation on site.</p> <p>As such, no increase in emissions or associated impacts on the landscape environment are envisaged as a result of the requested changes.</p> <p>It is noted that since its operation as a waste licence facility by RILTA Environmental Ltd. (Licensee), there have been no landscape-related complaints received.</p>   |