

**ATTACHMENT 3: Review of 2007 EIS (W0192-02) in context of Technical Amendment Request (2016)**

EIS Subject	EIS 2007 Page Number	Relevant Excerpts from 2007 EIS submitted in the Waste Licence Review	Confirmation of no increase in emissions or associated impacts as a result of requested changes
Principal Elements of Development	Pg. 2-24	<p><i>Development consists of four discrete operations namely:</i>  <i>Drum Recovery centre</i>  <i>Hydrocarbon waste treatment centre</i>  <i>Hazardous waste transfer station</i>  <i>Contaminated soil</i></p>	<p>This excerpt highlights that the 2007 waste licence application and EIS envisaged the handling of hazardous materials (including soils) in the transfer building for bulking prior to onward transport to relevant recovery facilities.</p> <p>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 2007 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 given that the 2007 EIS assessed comparable waste handling activities.</p>
Proposed activities in Transfer Building	Pg. 2-33	<p><i>This is a bulking up process where waste is transported to the facility almost exclusively in articulated tipper trucks. Waste on arrival is directed to the tipping floor.</i></p> <p><i>Waste is stacked using and earth moving machine on tracks. When enough waste has accumulated for export and a Trans-frontier Shipment notification is in place, waste is reloaded onto tipper trucks and transported to port where the waste is tipped on to a specialised bulk storage tray on a ship.</i></p>	<p>The requested changes in the TA include waste bulking, re-loading and transportation off site under Transfrontier shipment.</p> <p>Such activities were assessed in the EIS and waste licence review application in 2007.</p>
Potential Waste streams considered In EIS	Pg. 2-24	<p><i>42,725 tonnes of total in 2006 was classified as Contaminated Soil. It should be noted that this soil is not processed in any form while on site.</i></p>	<p>The requested changes to accommodate ash waste residue are comparable to wastes previously assessed in the 2007 waste licence review applications, which included the bulking up and transfer of contaminated soils (i.e. 48,500 tonnes per annum).</p>
Typical handling/repackaging techniques	Pg. 2-31	<p><i>The Hazardous Waste Transfer Station is also operated by RILTA Environmental Ltd. (IRL) and allows for the bulking up and transfer of hazardous waste for recovery/disposal generally to facilities in Europe.</i></p>	<p>The requested changes include bulking up, and transfer of hazardous waste. These activities were assessed in detail in the the waste licence review application in 2007.</p>

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Human beings	Pg. 4-2	<p><i>Due to the facility's location in a Business Park, there are a limited number of residences likely to be directly or indirectly affected by the facility. There are only 8 dwellings within 500m of the facility and the nearest dwelling is approximately 250m from the facility. This dwelling is located to the west of the site.</i></p>	<p>There have been no significant changes in the existing environmental setting since 2007. The W0192-03 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 initial 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>
Traffic	Pg. 9-14	<p><i>Tobin wish to submit an application on behalf of RILTA for an increase in the annual throughput of waste at the site from 62,500 tonnes per annum to 111,000 tonnes per annum. The increase in annual tonnage will be due to an increase in soil accepted and transferred into and from the site. (Note: This equates to an increase of 48,500 tonnes for soils)</i></p>	<p>9,278 tonnes (average) of contaminated soils were accepted at the RILTA W0192-03 facility during the 2013 to 2015 period. Taking an average throughput of 10,000 tonnes per annum for soils, and adding 28,000 tonnes of ash residue per annum (which is the subject of this TA), this would result in approximately 38,000 tonnes per annum of soils and ash residue combined.</p> <p>This equates to 78% of the original amount of throughput and associated traffic movements applied for in the 2007 EIS and associated waste licence review application (i.e 48,500 tonnes of soil).</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>

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Noise	Pg. 9-16 & 9-17	<p><i>It is anticipated that with the increase in soil tonnage allowances, an additional 36 vehicle movements per day will be generated, bringing the total to 88.</i></p> <p><i>There is a logarithmic relationship between noise levels and traffic volume and the higher the existing traffic volume the greater is the traffic increase required to produce a perceptible noise change. Typically doubling the road traffic flow produces a 3 dB(A) change in noise level. An increase in vehicular movements of the order proposed will continue to have a negligible noise impact along the local road network.</i></p>	<p>Sound power levels and associated equipment/processes used for the 2007 assessment included a mechanical granulator, (82dBA), road tanker pumping (88dBA), shot blasting (89 dBA), air denter (83.3 dBA), Spray booth (88 dBA), spray booth extraction vent (83.8 dBA), conveyor at drying tunnel (83.1 dBA), trucks moving within yard (56 dBA) and Front End Loader (77 dBA).</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 lower than the plant proposed and assessed in the 2007 EIS (some plant exceeding 89dB(A).)</p> <p>Furthermore it is noted that this bagging activity under TA consideration will occur indoors, which is in keeping with Section 2.6.4 of the 2007 EIS.</p> <p>Regarding noise from traffic movements, the proposal under TA consideration will result in traffic movements less than those assessed in the 2007 EIS (78% of the maximum traffic movements associated with soils, as reported in the 2007 EIS).</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>
Air	Pg. 8-4	<p><i>The soil is transferred directly to an internal building where it is contained until it is transferred off site. Therefore, the impact of dust will be insignificant.</i></p> <p><i>In addition, staff at RILTA will try to ensure that all deliveries of soil to the site will be covered in order to prevent soil blowing from the tipper trucks prior to storage in the soil shed.</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 &amp; bagging) will be conducted indoors, as envisaged in the 2007 Waste Licence review application.</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 W0192-03', 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>

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Geology	Pg. 6-4	<p><i>As the site is currently covered in made ground, with the exception of a 2m area of landscaping along the perimeter of the site, no impacts on the existing geological environment are predicted.</i></p>	<p>The bagging activities will be undertaken in the transfer building only. No bagging 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 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 geology-related complaints received.</p>
Water	Pg. 7.19	<p><i>Overall, the impact on the surface water and groundwater environments at the facility will be minimal as long as the surface water runoff from the hazardous waste transfer station is managed and controlled.</i></p>	<p>The bulking 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) on 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 or groundwater 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 3rd party water-related complaints received. Whilst some parameters on site have been observed to be elevated in the groundwater, these parameters were recorded as being elevated prior to the development of the site in 2004 (Tobins Report August 2016 submitted to Agency).</p>
Cultural Heritage	Pg. 12-22	<p><i>As the site is currently covered in made ground, with the exception of a 2m area of landscaping along the perimeter of the site, no impacts on the existing archaeological and cultural heritage are predicted.</i></p>	<p>As the bagging and transfer activities will happen within an existing purpose built transfer building, with no intrusive works proposed, 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>

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Ecology	Pg. 5-13	<p><i>As the site is currently covered in made ground, with the exception of a 2m area of landscaping along the perimeter of the site, no direct or indirect impacts on the existing ecology of the site are predicted.</i></p>	<p>No changes will occur to the existing building or hardstanding footprint. All bagging activities will be undertaken indoors, as originally envisaged in the 2007 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-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		<p><i>The proposed increase in tonnage of contaminated soil to the RILTA facility will have no impact on the landscape of the area or the visual appearance of the site as no change to the current infrastructure or processing is proposed.</i></p>	<p>No changes will occur to the existing building or hardstanding footprint. All bagging activities will be undertaken indoors, as envisaged in the 2007 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>

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