

**From:** Gretta Hannigan [redacted]  
**Sent:** 29 March 2017 11:28  
**To:** Dorota Richards  
**Subject:** RE: W0242-02 Padraig Thornton Waste Disposal Ltd - IE Application

Environmental Licensing Programme  
Office of Environmental Sustainability

**Name and address of applicant:** Padraig Thornton Waste Disposal Limited t/a Thornton's Recycling, Unit S3B, Henry Road, Parkwest Business Park, Dublin 12.

**- Location of facility:** Millennium Business Park Facility, Millennium Business Park, Cappagh Road (in townlands of Grange and Cappoge), Dublin 11.

**- \*Class and Nature of the Activity:** 11.1.0:- The recovery or disposal of waste in a facility, within the meaning of the Waste Management Act, 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required. (is an industrial emissions directive activity, in so far as the process development or operation specified in 11.1 is carried on in an installation connected or associated with another activity that is an industrial emission directive activity).

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11.4 (b):- Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day, involving one or more of the following activities (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): (ii) pre-treatment of waste for incineration or co-incineration

**- Reference No:** W0242-02

Dear Sir,

Inland Fisheries Ireland have examined the above application by Padraig Thornton Waste Disposal Ltd. for a materials processing and transfer facility of up to 170,000 tonnes per annum of waste including municipal solid waste, waste wood/green waste and brown bin waste at Millennium Business Park, Cappagh Road, Dublin 11.

The site is within the catchment of the Tolka River a significant salmonid system. The river supports Atlantic salmon, Lamprey and Brown trout populations in addition to eel, stone loach, minnow and three spined stickleback and provides a particularly important nursery function for salmonid species throughout.

No wastewater should be allowed discharge to surface water from this facility.

Only clean, uncontaminated surface and storm waters must be permitted to discharge to the surface water network so that the salmonid status of watercourses is protected. Clarification is required on the current status of the existing attenuation facility which attenuates stormwater from the Millennium Park before final discharge to the

River Tolka downstream of Corduff Bridge, Blanchardstown. The quality of the water in the attenuation tank was unsatisfactory in 2014, since that time it is our understanding that the stormwater from the Millennium Park discharges from the existing tank to the Irish Water foul sewer. This issue needs to be addressed.

Any licence should include provision of an inspection chamber on the storm water line between the attenuation area within the facility and the attenuation area for Millennium Park.

BAT measures regarding effluent / stormwater management in the context of protection of receiving waters must be implemented at all times. The foul water loading appears conservative, while the EIS states that the maximum flow of 8.72cu.m is predicted at times of building wash-down, it fails to discuss the hydraulic loading for leachate generated other than during the wash down process. It is essential that the receiving foul water infrastructure has adequate capacity to accept predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters.

The basis of the Spillage Containment Plan discussed in Volume 2 Section 10 must be such that leachate cannot under any circumstance reach the surface water system. It would not be acceptable under flood conditions that leachate could discharge to surface water drainage and ultimately the River Tolka.

At minimum the Mitigation detailed in Sections 10.6.2, 11.7.2 and 11.7.3 of the EIS should be a condition of any IE Licence

Please advise us of your decision on this application,

Yours sincerely,

Greta Hannigan

Gretta Hannigan  
Senior Fisheries Environmental Officer

Inland Fisheries Ireland- Dublin

**Iascach Intire Éireann**  
**Inland Fisheries Ireland**

**Tel** +353 (0)1 8842693

**Email**

**Web** [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

3044 Lake Drive, City West, Dublin 24, IRELAND.

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**From:** Dorota Richards [<mailto:d.richards@epa.ie>]

**Sent:** 22 March 2017 12:28

**To:** An Bord Pleanála; An Taisce; Department of Agriculture Food and the Marine; Department of Arts, Heritage, Regional, Rural & Gaeltach Affairs; Dept of Communications, Climate Action & Environment; Dept of Communications, Climate Action and Environment; Fáilte Ireland; Health & Safety Authority; Health Service Executive; Mary Larkin;

Irish Water; Minister for Transport, Tourism and Sport; Teagasc; The Heritage Council; Fingal County Council (Environment Section); Fingal County Council (Planning)

**Subject:** W0242-02 Padraig Thornton Waste Disposal Ltd - IE Application



22 March 2017

Reg. No. W0242-02

Dear Sir/Madam,

In accordance with the provisions of Regulation 16 of the EPA (Industrial Emissions) (Licensing) Regulations 2013, you are being routinely notified that an application for a licence, details of which are set out below, was received by the Agency on 20 March 2017.

- **Name and address of applicant:** Padraig Thornton Waste Disposal Limited t/a Thorntons Recycling, Unit S3B, Henry Road, Parkwest Business Park, Dublin 12.
  - **Location of facility:** Millennium Business Park Facility, Millennium Business Park, Cappagh Road (in townlands of Grange and Cappoge), Dublin 11.
  - **\*Class and Nature of the Activity:** 11.1.0:- The recovery or disposal of waste in a facility, within the meaning of the Waste Management Act, 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required. (is an industrial emissions directive activity, in so far as the process development or operation specified in 11.1 is carried on in an installation connected or associated with another activity that is an industrial emission directive activity).  
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11.4 (b):- Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day, involving one or more of the following activities (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply): (ii) pre-treatment of waste for incineration or co-incineration
- **Reference No:** W0242-02

A copy of the Environmental Impact Statement, which was submitted by the applicant, is available to view on the Agency's website [www.epa.ie](http://www.epa.ie). The Planning Authority to whom the EIS has been submitted is An Bord Pleanála.

The application is being processed by the Agency and you will be notified of the proposed determination in due course. In this regard any comments in relation to this application should be forwarded to the Agency as soon as possible. A copy of the application and associated correspondence are available for public inspection on the Agency's website [www.epa.ie](http://www.epa.ie).

Please note that there is no requirement for you to acknowledge receipt of this email.

If you have no comments to make in relation to this application, there is no requirement for you to reply to this email.

Yours faithfully

Environmental Licensing Programme  
Office of Environmental Sustainability

\*Class/es may change

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