



# EIAR Screening Report

Waste licence Application

Packaging Laundry Ltd.

Unit C4, Oldcourt Industrial Estate,

Boghall Road, Bray, Co. Wicklow

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## DOCUMENT CONTROL

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## LIMITATIONS

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Verde performed no environmental sampling or analysis over the course of this screening exercise. All Information contained in this report is based on the information made available to Verde, which we assume to have been provided in good faith.

Verde makes no other representations whatsoever, including those concerning the legal significance of its findings or as to other legal matters touched on in this report, including, but not limited to ownership of any property or the application of any law to the facts set forth herein.

Unless specifically requested by our Client, Verde disclaims any obligation to update the report for the events taking place after the time during which we conducted our assessment.

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## EXECUTIVE SUMMARY

Verdé Environmental Consultants (Verdé) has been commissioned by Packaging Laundry Limited to complete an Environmental Impact Assessment Screening Report for an application for a Waste Licence for an existing permitted facility located on Oldcourt Industrial Estate in Bray, County Wicklow in accordance with the EIA Directive.

The purpose of the report is to determine whether an Environmental Impact Assessment Report (EIAR) is required for the proposed operations which will operate under the conditions of a waste licence issued by the Environmental Protection Agency. An Appropriate Assessment Screening (AA Screening) report has been prepared by Verdé and is referred to in this report. That report assesses the potential of the proposed activity to adversely affect the integrity of Natura 2000 sites (i.e. SPAs and SACs) and concludes that there will be no significant effect to Natura 2000 sites as a result of the proposed activity, alone or in combination with any other permitted or proposed project.

This EIA Screening exercise was completed to determine the potential for the proposed activity to have significant environmental effects or not. The exercise has been informed by a desk study of the site based on the best available information and from a site walkover conducted in April 2019. The following conclusions are made;

- The proposed licensable activity does not constitute development for which EIA is mandatory or required.
- In terms of scale, the proposed licensable activity falls significantly below the thresholds, and/or definitions, set out in;
  - Class 9 in Part 1 of Schedule 5 of the Regulations.
    - *Waste disposal installations for the incineration, chemical treatment as defined in Annex IIA to Directive 75/442/EEC3 under heading D9, or landfill of hazardous waste.*
  - Class 10 in Part 1 of Schedule 5 of the Regulations.
    - *Waste disposal installations for the incineration or chemical treatment as defined in Annex IIA to Directive 75/442/EEC under heading D9, of non-hazardous waste with a capacity exceeding 100 tonnes per day.*
  - Class 11(b) in Part 2 of Schedule 5 of the Regulations.
    - *Installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule.*
- The proposed licensable activity will involve the continuation of existing permitted site activity at the site, namely the acceptance, reconditioning, dismantling and storage of non-hazardous packaging materials including intermediate bulk containers (IBCs) and steel drums. The licence will also allow for the acceptance and refurbishment of containers (mainly IBCs) that formerly contain residue of hazardous materials. This material is described by List of Waste Code 15 01 10\*.

- This screening report concludes that the revised activity at the site will not result in significant negative impacts on the environment.
- The screening report concludes that the revised activity will not require a sub-threshold environmental impact assessment.
- This report concludes that this is a sub-threshold type project which is not likely to have a significant effect on the environment, either by itself or in combination with other plans or projects, and that an Environmental Impact Assessment (EIA) is not required in this instance.

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## 1 INTRODUCTION

### 1.1 Project Details

Verde Environmental Consultants (Verde) has been commissioned by Packaging Laundry Limited (Packaging Laundry) to complete an Environmental Impact Assessment Screening Report to accompany an upcoming Waste Licence application in accordance with the EIA Directive 85/337/EEC, as amended. The aim of the report is to determine the likely significant effects of the proposed activity on the environment. The EIA Screening determines whether an EIA is required for the proposed activity which will be subject to a waste licence issued by the Environmental Protection Agency.

### 1.2 Overview Of Proposed Licensed Activities

Packaging Laundry currently operates under a waste facility permit that was issued by Wicklow County Council in May 2018 (Permit Ref. No. WFP-WW-18-0043-01). The permit was granted listing the site as Class 10 activity with EWC 15 01 02 and 15 01 04.

The following is a brief overview of operations at the Packaging Laundry site:

- IBC Reconditioning Closed Loop - Packaging Laundry provides a reconditioning service for customer's used IBC's. This involves removing trace residue from empty IBCs before they are dried, pressure tested, checked for defects and returned to the Customer for reuse again for the same purpose.
- IBC Reconditioning Open Loop – This occurs where empty, used IBCs are collected from a customer who has no further use for the packaging. The same reconditioning service is performed before the IBC's are sold to a third party for re-use. This provides an alternative to them having to purchase a new IBC.
- Steel Barrel Reconditioning Open Loop – Packaging Laundry Ltd. also provide a reconditioning service for customer's steel drums which are cleaned, dried and checked for defects before being returned to the Customer for re-use again for the same purpose.
- IBC Dismantling and Rebottling – Damaged IBC bottles, or bottles that fail the leak test are removed, washed, dried and cut into manageable pieces before being transferred to authorised recyclers. New bottles are then placed into reconditioned IBC steel cages and supplied as a re-bottled IBC to a third party.
- Steel Drum Dismantling – Steel drums that are damaged beyond safe repair are washed and crushed before transfer to authorised metal recovery facility.

Packaging Laundry has consulted with Wicklow County Council and the EPA (under Article 11) to be allowed to accept packaging material at the facility that formerly contained hazardous material. The Agency confirmed that the acceptance of non-hazardous waste IBCs and steel drums for reconditioning as described above can be accommodated under the existing waste facility permit. The EPA noted, however, that these activities do not apply to the acceptance,

recovery and storage of used packaging that contained remnants of hazardous substances. It was confirmed that a waste licence will be required to allow material described under List of Waste Code 15 01 10\* (packaging containing residues of or contaminated by hazardous substances) to be accepted at the facility.

Packaging Laundry intends to apply to the Agency so that List of Waste Code 15 01 10\* can be accepted at the facility. Containers accepted on the site will be effectively empty as is currently the case with any IBC or container accepted onto the facility at present under the existing Waste Facility Permit. Packaging laundry will only collect IBC's and Drums which are drained or emptied to the point that they are considered to be as empty as practically possible. In advance of any collection, this is agreed with suppliers via a container returns form which outlines the collection conditions.

The type and quantity of wastes to be handled, stored and treated on site are described in Table 1.1 below. Out of a total tonnage per annum of 1,650; up to 600 tonnes will constitute packaging that contains residues of, or contaminated by a hazardous substance.

### 1.1 Summary details of planned, licensed waste types and quantities for proposed site.

<i>List of Waste Code</i>	<i>Description of Waste</i>	<i>Tonnage PA</i>
15 01 02	Plastic Packaging	100
15 01 04	Metallic Packaging	250
15 01 05	Composite packaging	400
15 01 01	paper and cardboard packaging	100
15 01 03	Wooden Packaging	200
15 01 10*	Packaging containing residues of or contaminated by dangerous substances	600
	<b>Total Tonnage PA</b>	<b>1,650</b>

## 2 EIA SCREENING LEGISLATION AND GUIDANCE

### 2.1 EIA Legislation

The EIA Directive 85/337/EEC (as amended) on the assessment of the effects of certain public and private projects on the environment is designed to ensure that projects likely to have significant effects on the environment are subject to a comprehensive assessment of environmental effects prior to development consent being given. This Directive was amended by the following Directives: Directive 97/11/EC of 3 March 1997, Directive 2003/35/EC of 26 May 2003, Directive 2009/31/EC of 23 April 2009, (codified in Directive 2011/92/EU of 13 December 2011) and most recently by Directive 2014/52/EU of 16 April 2014.

In Ireland, EIA provisions relating to planning permissions are contained in the Part X of the Planning and Development Act, 2000, as amended (hereafter referred to as “the Planning Act”), and in Part 10 of the Planning and Development Regulations, 2001, as amended. EIA Screening determines whether an EIA is required for a specified project. Projects requiring mandatory EIA are listed in Schedule 5 of the Planning and Development Regulations 2001, as amended.

The 2014 EIA Directive has been transposed into national planning law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018), with effect from 1<sup>st</sup> September 2018, and the European Union (Planning and Development) (Environmental Impact Assessment) (No.2) Regulations 2018, with effect from 8<sup>th</sup> October 2018.

### 2.2 EIA Guidelines

The Department of Housing, Planning and Local Government (DHPLG) revised the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, in August 2018. These updated Guidelines deal with new legislative provisions resulting from the 2014 EIA Directive and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) and how they are to be addressed in practice.

The Agency published draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (Aug 2017), which includes guidance on preparing an Environmental Impact Assessment Report (EIAR) and the Screening process. In addition, both the European Commission<sup>1</sup> and the Institute of Environmental Management and

<sup>1</sup> Guidance on EIA: Screening, European Commission (2001) Luxembourg: Office for Official Publications of the European Communities.

Assessment<sup>2</sup> (IEMA) have published guidance on various aspects of the EIA process which includes guidance on screening. This report has been prepared in consideration of the contents of each of the above referenced documents.

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<sup>2</sup> Environmental Impact Assessment Guide to: Delivering Quality Development, IEMA (2016) Lincoln, UK

### 3 EXISTING SITE DETAILS

#### 3.1 Site Location and Setting

The proposed licensed activity will take place at an existing waste management facility located at the southern end of the Oldcourt Industrial Estate (also referred to as the Oldcourt Business Park). The site is accessed via Wurtzburg Avenue, off the Boghall Road in Bray, County Wicklow. The site comprises a sub-rectangular shaped industrial/warehouse unit with an outdoor delivery and dispatch area to the front (northeast) and a small triangular, outdoor enclosed yard area on its eastern side. The overall site area, including the foreyard and storage yard areas is approx. 0.13 hectares. The site faces the industrial park's sole entrance and exit onto Wurtzburg Avenue. The Ordnance Survey of Ireland (OSI) X, Y ITM coordinates for the site are 725535, 716921.

The adjacent land uses are listed in Table 3.1 below

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**Table 3.1 – Adjacent Land Uses**

North	<p>Immediately north of the site is the main vehicle thoroughfare of Oldcourt Industrial Estate, adjacent are other business within the industrial estate including:</p> <ul style="list-style-type: none"> <li>• A vehicle service centre</li> <li>• A tyre outlet</li> <li>• A disused bathroom supplier</li> <li>• A kitchen &amp; bedroom supplier</li> <li>• A decorating supplier</li> </ul> <p>Beyond these units, across the Boghall Road, the area is occupied by the Oldcourt Drive/Oldcourt Avenue housing development.</p>
West	<p>To the immediate west/southwest of the site, are several adjacent industrial/commercial units within the industrial park including (closest first);</p> <ul style="list-style-type: none"> <li>• A home improvement centre/supplier</li> <li>• A packaging component supplier</li> </ul> <p>Beyond the industrial park, the Cedar Court housing development occupies the nearside of the Schools Road. Beyond Schools Road, the Ballywaltrim Playground and Saint Fergal's National School occupy the western side of the Schools Road.</p>
East	<p>To the east of the site, an industrial unit, supplying timber and wood products. Beyond this unit, across the Wurtzburg Avenue, the road is bordered by a long, rectangular storage yard. Beyond this yard, are extensive detached housing developments.</p>
South	<p>Directly south of the proposed site is a small storage yard that appears to contain concrete slabs and building materials. Beyond this yard, across the Schools Road, several key developments exist;</p> <ul style="list-style-type: none"> <li>• The Bray Fire Station with associated vehicle sheds, practice tower and buildings.</li> <li>• A Bray Town Council depot</li> <li>• The entrance to the Southern Cross Business Park containing several industrial and commercial units.</li> </ul>

### 3.2 Site History & Planning Records

Primary sources used to research the history of the site included available extracts from historical Ordnance Survey Ireland (OSI) maps, aerial photographs and planning information from The Department of Housing, Planning,



Community and Local Government via their web portal Myplan.ie. The maps consulted include the OSI 6-inch historic maps from 1837 to 1842, the OSI 25-inch historical maps surveyed between 1888 and 1913 and the OSI 6-inch Cassini map surveyed in early 20th century. Appendix B contains the images and maps collected during this investigation.

In summary, the historic maps and aerial imagery shows that no development or modification of note had occurred on the site through the 19<sup>th</sup> and early 20<sup>th</sup> century. The singular apparent exception to this is seen in the 1837 to 1842 6-inch maps which show the site was in use as a “brick yard”. This likely related to the Boghall Brick Works which operated nearby to the north. The duration and scale of this industry is not known. Between 2005 and 2011; aerial imagery shows the development of the Cedar Court residential development. The facility is in situ as part of what was then known as the Oldcourt Industrial Estate (also referred to as Oldcourt Business Park). The same imagery shows the development of the Southern Cross Business Park between 1995 and 2000 to the south of the proposed site; as well as its expansion between 2000 and 2005.

Available planning records have also been consulted for the purposes of this study and the only planning record for the proposed site is that of the original planning permission process for the Oldcourt Industrial Park in December 1978 (ref: 1470CC3); which covered the development of the units within the park. No further planning records are listed for the proposed site.

### 3.3 Site Physical Setting

Details of the site physical setting are outlined in Table 3.2. Information on the site location, hydrology, geology hydrogeology and ecology of the area has been obtained from records maintained by the Geological Survey of Ireland (GSI), Environmental Protection Agency (EPA), Ordnance Survey of Ireland (OSI), Water Framework Directive Maps, National Parks and Wildlife Service (NPWS) databases and on-line resources of Department of Housing, Planning and Local Government (myplan.ie).

**Table 3.2 – Site Physical Setting**

FEATURE	DETAILS & COMMENTS
<b>Topography</b>	Topography is generally flat over the site area with a gentle slope to the northeast from a high of approximately 49m above ordnance datum (AOD) in the southwest to 48mAOD in the NE. There are no hydrographic features such as rivers or lakes close (<500m) to the proposed site. Site levels are quoted from OSI national contours which reference the Malin Head Datum 1970.
<b>Geology</b>	<u>Overburden:</u> The EPA national soil database classifies the soil as being made ground. The National Soil Information System (SIS) classifies the soils on the proposed site as urban. The Geological Survey of Ireland (GSI) subsoil database classifies the soils on the site as made ground with generally low permeability.

	<p><u>Solid Geology:</u></p> <p>The GSI Bedrock Geology (100k) layer information shows that the proposed site is underlain by the Cambrian metasedimentary package of the Bray Head Formation. As stated in the GSI layers; this formation is typified by greywacke and by the distinctive quartzite units which range in thickness from 10m to over 100m. Slump deformation is widespread with slumped zones from 10m to 200m thick alternating with coherent undeformed sediments. The GSI's 100k bedrock geology map shows a significant thrust fault to the northwest of the site, and that the site itself sits in the northern limb of a large regional synform.</p>
<p><b>Hydrogeology</b></p>	<p><u>Regional Classification:</u></p> <p>According to GSI data, the bedrock aquifer, is categorised as a Poor Aquifer, classified as <i>PI</i>, bedrock which is generally unproductive except for in local zones. The Water Framework Directive Groundwater Body underlying the site is the Wicklow GWB (summary in Appendix C) in which the majority of groundwater flow occurs in the top few of meters. This flow is mostly in along a weathered zone in a lateral direction towards rivers and springs. In some instances, a greater degree of structural deformation may provide a fracture network which will allow groundwater movement at greater depths. This may be relevant considering the site's proximity to a possible zone of structural deformation. Only flow in isolated fractures is expected below 30m. Within this GWB; Regional groundwater flow paths are not considered to develop, as the rocks do not have sufficient transmissivity to transport water over long distances. Typical groundwater flow paths will be in the order of a couple of hundred metres, with discharge occurring to the closest surface water feature.</p> <p><u>Vulnerability:</u></p> <p>The GSI vulnerability map for the area describes the aquifer as having a vulnerability rating of low across the site. Based on the Aquifer Vulnerability Mapping Guidelines provided by the GSI, this indicates that the soil and subsoil above the aquifer is &gt;10m thick and is generally low permeability; thus, offering significant protection to the aquifer.</p> <p>The bedrock aquifer's general low permeability and conductivity in the area suggests that much of the surface water will run to nearby streams.</p> <p><u>Well &amp; Spring Search:</u></p> <p>Within 650 to 700m of the site, to the west and northwest, two groundwater abstraction wells are recorded in the GSI's well database. One, to the northwest, was drilled to a depth of c.25m in 1965 and is classified as a low yield (38m<sup>3</sup>/day) well of unknown purpose. The second, to the east, was drilled to a depth of c.25m in 1971 and is classified as a low-yield (27m<sup>3</sup>/day) domestic-only well. Approximately 500m to the south, up gradient, of the site, a high yield (300m<sup>3</sup>/day), domestic well is recorded as being drilled to a depth of 50.3m in 1997.</p> <p>There are no wells, springs or source protection areas or springs recorded within 500m of the proposed site.</p>
<p><b>Hydrology/Ecology</b></p>	<p><u>Surface Water Courses/ Abstractions</u></p>

	<p>The project site is located within the Dargle River catchment. An un-named and un-mapped stream flows east along the Boghall Road to the north of the project site. This stream discharges to the Swan Stream which is a tributary of the Dargle River which discharges to the sea at Bray Harbour. No European Sites occur within the vicinity of the Dargle River discharge point. The nearest European Site to the discharge point is Bray Head SAC which is designated for terrestrial habitats, not influenced by surface water bodies.</p> <p>No river abstraction activities are currently mapped in the area of the proposed site.</p> <p><u>Water Framework Directive status:</u></p> <p>River: Dargle South (Dargle_040) (WFD: IE_EA_10D010300) is currently risk classified as <b>Good</b> and <b>Not at Risk</b> by the EPA.</p> <p>Groundwater: The Wicklow GWB (ID: IE_EA_G_076) is currently classified as <b>Good</b> by the EPA. Its risk status is currently set as <b>Review</b>.</p> <p><u>Protected Areas:</u></p> <p>There are no protected areas or European Sites within 1000m of the proposed site.</p> <p>The closest conservation area is the Dargle River Valley Proposed National Heritage Area (pNHA ID: 002104) 1400m to the west.</p> <p><u>Flooding:</u></p> <p>According to OPW flood maps (floodmaps.ie), the proposed site is not prone to flooding from either fluvial or pluvial (rainfall) events.</p>
<b>Radon</b>	<p>According to the GSI Radon Map of Ireland, the estimated percentage of homes/businesses in the region of the site above the reference level of 200Bq/m<sup>3</sup> for radon is 5-10% (6.814%) making this a Moderate Radon Area.</p>
<b>Licences/Permits</b>	<p>The site currently operates under a waste facility permit issued by Wicklow County Council in May 2018 (WFP-WW-18-0043-01). Under terms and conditions of the permit, Packaging Laundry is permitted to carry out Class 10 activity in relation to List of Waste Codes 15 01 02 and 15 01 04. Class 10 is listed on the permit as the Principal Activity. This covers the Recovery of <b>non-hazardous</b> waste (packaging) only.</p> <p>The site is also subject to an Irish Water trade effluent discharge permit (ID: IW-DTS-809938-01) to the local foul sewage network. This license was issued on 13 December 2017.</p> <p>The nearest waste licence facility is Starrus Eco Holdings Limited (Greenstar) materials recovery facility at Fassaroe, approximately 1.8km to the northwest.</p> <p>Alert Packaging is an IPC licensed facility located approximately 560m to the south off the Southern Cross Road.</p>

## 4 APPROPRIATE ASSESSMENT SCREENING REPORT

An Appropriate Assessment Screening report has been completed for the proposed licensable activity. This report was commissioned in order to assess the potential of the proposed development to have “likely significant effects” on any Natura 2000 sites in accordance with the planning obligations under the *European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011)*. This report includes a description of the proposed development, details of the environmental setting, a map of Natura 2000 sites in the surrounding area and an appraisal of potential pathways for indirect impacts.

The report was carried out to established standards, guidelines and best practices and followed the general steps of;

- Description of the project and determine whether it is necessary for the conservation management of European Sites
- Identification of European Sites that could be influenced by the project
- Where European Sites are identified as occurring within the sphere of influence of the project, identification of potential effects arising from the project and screen the potential for such effects to negatively affect European Sites identified under Point 2 above
- Identification of other plans or projects that, in combination with the project, have the potential to affect European Sites.

The Appropriate Assessment Screening Report carried out for this project found, in summary, that;

- 13 European Sites occur within a 15km radius of the project site
- None of these European Sites are adjudged to be located within the zone of influence of the project
- In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded that the project is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives.

## 5 EIAR SCREENING

The EIA process derives most recently from the EU Directive 2011/92/EU (as amended by EU 2014/52/EU), which considers the effects of certain public and private projects on the environment. The Directive specifies the developments for which an EIA will be required and the information which must be provided in an EIAR prepared in connection with the proposed development.

The Directive is implemented in Ireland through S.I. No. 93 of 1999 entitled European Communities (Environmental Impact Assessment) (Amendment) Regulations, 1999 and its subsequent amendments.

An EIA screening exercise was undertaken to determine if EIA is required for the proposed development, as set out in the mandatory and discretionary provisions of the Planning and Development Act, 2000, as amended (the Act), and Schedule 5 of the Planning and Development Regulations, 2001, as amended (the Regulations). Certain projects, listed in Schedule 5 of the Regulations, due to their always having the potential for significant environmental effects, require mandatory EIA. Others, also listed in the Schedule 5 of the Regulations, contain threshold levels and for projects that fall below these thresholds it is the decision of the competent authority to decide if an EIA (and the associated Environmental Impact Assessment Report (EIAR)) is required.

Whether a 'sub-threshold' development should be subject to EIA is determined by the likelihood that the development would result in significant environmental effects. Significant effects may arise due to the nature of the development, its scale or extent and its location in relation to the characteristics of the receiving area, particularly sensitive environments.

Operations as proposed at the Packaging Laundry do not fall under those projects requiring mandatory EIA's as prescribed in Annex I of the EIA Directive (Schedule 5, Part 1 of the Planning and Development Regulations 2001, as amended). Therefore, a mandatory EIA is ruled out for reasoning set out in Section 5.1 below. Given that the status of the proposed activity as sub-threshold, the requirement for EIA must be determined on a specific case basis.

### 5.1 Mandatory EIA Thresholds

Section 172 of the Planning & Development Act 2000, as amended, provides the legislative basis for mandatory EIA. It states that "An environmental impact assessment shall be carried out by a planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either:

- (a) the proposed development would be of a class specified in –
- (i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either – (I) such development would exceed any relevant quantity, area or other limit specified in that Part, or (II) no quantity, area or other limit is specified in that Part in respect of the development concerned,
  - or
  - (ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either – (I) such development would exceed any relevant quantity, area or other limit specified in that Part, or (II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or
- (b)
- (i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part;
  - and
  - (ii) the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.”

Further to the above, Schedule 5 of the Planning & Development Regulations 2001, as amended sets out a number of classes and scales of development that require EIA. There is no class set out under Part 1 of Schedule 5 that describe the washing and reclamation/recovery of plastic & metal packaging and resultant discharge of residual hazardous waste to sewer once treated. Under Part 2 of Schedule 5, in relation to Infrastructure projects, Class 11(b) of Part 2 refers to waste disposal facilities as follows;

### **11. Other Projects**

*(b) Installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule.*

The proposed activity to be covered by the Licence will involve the acceptance and handling by Packaging Limited of packaging waste that contains residues of dangerous substances.. The packaging collected will be as empty as practically possible. This can vary depending on the viscosity of the remnant and the specification of the packaging, but will not exceed 1% of the capacity of the packaging. The total annual tonnage of such material which includes the residue and the container (List of Waste Code 15 01 10\*) will not exceed 600 tonnes. The overall Licence will allow acceptance of up to 1,650 tonnes of packaging waste per annum. The quantity of waste to be handled on the site is significantly below the threshold of 25,000 tonnes for mandatory EIA as specified in Class 11(b) of Part 2.

## 5.2 Sub-Threshold Screening

To determine whether the project described in Section 2 above should be subject to an EIA, the following assessment is completed on the basis of the Criteria in Schedule 7 of the Planning and Development Regulations (as amended) and utilising the Screening Checklist provided in the ‘Environmental Impact Assessment of Projects, Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU)’ (EC, 2017). The criteria are grouped under the following three headings in Table 4.1 below;

- Characteristics of the Proposed Development
- Location of Proposed Development
- Characteristics of Potential Impacts

The assessment of the likelihood of significant environmental effects requires professional judgment. The DoEHLG Guidance Document ‘Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development’ states that it is not intended that special studies or technical evaluations will be necessary for the purpose of making a decision. In this context, this screening exercise has relied on available information. In addition to the above reference criteria, a further screening exercise was completed to assess the most significant potential impacts and Table 5.1 presents the sections that would be covered in any EIA as specified in the Directive and includes the aspects of the environment with the potential to be significantly affected by the project.

**Table 5.1: Screening Criteria**

Screening Questions	
Characteristics of the Proposed Development	
Is the scale of the project considered to be significant?	No. The site area is small (0.1347 ha) and comprises a singular existing industrial unit within a well-established industrial/business park. The scale of the proposed development is in keeping with the scale of the receiving setting and surrounds in terms of size, scale and purpose and is therefore not considered significant. The facility is currently operating under a waste facility permit. The licence that is being applied for is to allow for the acceptance of up to 1,650 tonnes per annum.
Is the size of the project considered significant when considered cumulatively with other adjacent developments?	No. The size and footprint of the proposed development is small and is not predicted to change from its current, approved footprint. The surrounding industrial units of the estate include a carpentry business, a kitchen supplier, home-improvement center, a packaging manufacturer and others; some of which are larger in scale than the proposed facility.
Will the project utilize a significant quantity of natural resources, in particular land, soil, water or biodiversity?	No. The proposed activity will largely be focused around the recovery and reconditioning of plastic and metal packaging materials, and as such, promotes sustainability and is concerned with the reduction, recycling and reuse of waste materials. The main resource that will be used on site is water for the washing of the aforementioned tanks and packaging containers. Discharge records from the current

	<p>site activities show that 20,000 to 30,000 litres of water are used each month in the completion of these activities. Water usage at the site will not change significantly from the current use at the site.</p>
<p>Will the project produce a significant quantity of waste?</p>	<p>No. Waste will be reduced through the proposed activity in that packaging in the form of IBCs and drums will be refurbished for further use</p> <p>The site will continue to manage waste and promote the re-use of materials.</p> <p>Where packaging cannot be re-used (for example, damaged beyond repair IBC/drum), this material will be processed and segregated for transfer to authorised waste (plastic, metal) recovery facility.</p> <p>The maximum annual tonnage proposed to be accepted on the site is as follows;</p> <ul style="list-style-type: none"> <li>• Plastic Packaging: 100</li> <li>• Metallic Packaging: 250</li> <li>• Composite packaging: 400</li> <li>• Paper and cardboard packaging: 100</li> <li>• Wooden Packaging: 200</li> <li>• Packaging containing residues or contaminated by hazardous substances: 600</li> </ul>
<p>Will the project create a significant amount or type of pollution?</p>	<p>No. The wash-water from the tank cleaning, that is to be discharged to the sewer for treatment, is expected to be in the order of 20,000-30,000 litres per month. Plastic fines, created from working with the plastic containers, is minimised by carrying out these processes indoors in a controlled manner and through good housekeeping practices that are currently operated under the current Waste Facility Permit (WFP-WW-18-0043-01).</p>
<p>Will the project create a significant amount of nuisance?</p>	<p>No. The low throughput and processes of the proposed facility is such that, low levels of traffic, noise and general nuisance would be produced. The location of the facility on a long-established, low-density, industrial estate, is well suited to the proposed level of activity.</p>
<p>Will there be a risk of major accidents?</p>	<p>No. The proposed development is not of a type that poses a risk of major accidents, having regard to substances or technologies used. Detailed emergency responses are provided in Emergency Procedure (Document No. SOP06).</p>
<p>Will there be a risk of natural disasters, including those caused by climate change?</p>	<p>The potential natural disasters that may occur are limited to flooding and fire. According to OPW flood maps, the proposed site is not prone to flooding from either fluvial or pluvial (rainfall) events. In terms of fire risk, processes that involve the heating/drying of containers after washing have appropriate safety controls in place so that no such events are likely to occur.</p>
<p>Will there be a risk to human health (for example due to water contamination or air pollution)?</p>	<p>No. Any potential risk to human health from the small quantities of wastewater, chemical or hazardous substance residues being handled on site are managed by appropriate risk mitigation measures (Standard Operating Procedures, bunded storage and robust H&amp;S systems). As such, the scale and nature of the development is not likely to lead to significant human health impacts</p>
<p>Is the combination of the above factors likely to have significant effects on the environment?</p>	<p>No. Given the proposed scale of activity, limited emissions, experienced and trained personnel and controls already in place (including strict waste acceptance procedures), the combination of above factors is unlikely to have any significant effect on the environment.</p>
<p><b>Location of the Proposed Development</b></p>	
<p>Has the proposed development the potential to impact directly or indirectly on any site designated for conservation interest (e.g. SAC, SPA, pNHA)?</p>	<p>No. The AA Screening Report completed for the facility concludes that no significant potential impacts directly or indirectly on any designated sites. The report concluded that the project is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific practice and there is no reasonable scientific doubt as</p>



	to that conclusion.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?	No. The AA Screening Report completed for the facility concludes there will be no negative direct or indirect impacts to or reduction in Annex I habitat area.
Has the proposed development the potential to impact directly or indirectly on any habitats listed as Priority Annex I in the EU Habitats Directive?	No. The AA Screening Report completed for the site concludes that the facility will not have any significant effects on Natura 2000 sites and therefore no direct or indirect effects on Annex I habitats in the EU Habitats Directive.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?	No. The AA Screening Report completed for the site concludes that the facility will not have any significant effects directly or indirectly on any species listed as Annex II in the EU Habitats Directive.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex IV in the EU Habitats Directive?	No. The AA Screening Report completed for the site concludes that the facility will not have any significant effects directly or indirectly on any species listed as Annex IV in the EU Habitats Directive.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex I of the EU Birds Directive?	No. The AA Screening Report completed for the site concludes that the facility will not have any significant effects directly or indirectly on any species listed as Annex I of the EU Birds Directive.
Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?	No. The AA Screening Report completed for the site concludes that the facility will not have any significant effects directly or indirectly on the breeding places of any species protected under the Wildlife Act.
Has the proposed development the potential to impact directly or indirectly on the existing or approved land use?	No. The site is an existing permitted waste management facility. The site is zoned "E1" "Employment" in the Bray Town Development Plan therefore land use is compatible with surrounding lands.
Has the proposed development the potential to significantly impact directly or indirectly the relative abundance, availability, quality or regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground?	No. The established facility is small and the scale of proposed change to waste type being accepted will have a limited impact associated with natural resources. The relatively low quantities of water that are predicted for use are sourced from the Irish Water, Bray municipal water supply. The facility can be accommodated on this site with no significant negative effects on the abundance, availability, quality or regenerative capacity of the receiving natural environment.
Has the proposed development the potential to impact directly or indirectly on any protected structures or Recorded Monuments and Places of Archaeological Interest?	No. There are no protected structures or areas located within or in close proximity to the facility site.

Has the proposed development the potential to impact directly or indirectly on listed or scenic views or protected landscapes as outlined in the County Development Plan?	No. The established facility does not affect any listed or scenic views or protected landscapes.
<b>Type and Characteristics of Potential Impacts</b>	
Would a large geographical area be impacted as a result of the proposed development?	No. The geographic extent of the proposed activity is confined to the proposed facility site.
Would a large population of people be affected as a result of the proposed development?	No. The existing and proposed activity is on a site located within the existing urban area and industrial estate and is consistent with the land use pattern in the general area.
Are any transboundary impacts likely to arise as a result of the proposed development?	No.
Would the magnitude of impacts associated with the proposed development be considered significant?	No. The scale and type of activity at the facility is not likely to pose result in significant impacts.
In considering the various aspects of the environment, would the impacts of the proposed development be considered complex?	No. The facility is a modest industrial business and similar in type to those in adjacent units within the industrial estate. The primary focus of activity is the reconditioning of packaging containers for re-use through washing and drying and repairing where appropriate,
Is there a high probability that the effects will occur?	No. It is unlikely that negative impacts will occur associated with the proposed additional activity.
Will the effects continue for a long time?	No likely significant negative effects on the environment have been identified as a result of the proposed activity. The activity will have a long-term positive impact with regard to waste reduction and recovery through the reconditioning of packaging materials that would otherwise be destined for landfill or incineration.
Will the effects be permanent rather than temporary?	No significant permanent negative impacts are expected to result from the proposed operation of the facility.
Will the impacts be irreversible?	No likely significant effects on the environment have been identified as a result of the proposed activity.
Will there be significant cumulative impacts with other existing and/or approved projects?	No. The proposed changes to activities at the facility will not give rise to significant effects on the environment. No other industrial units are known to be planned or under construction in adjacent lands but the scale and type of operations in the area suggest they will not give rise to significant cumulative impacts.
Will it be difficult to avoid, or reduce or repair or compensate for the effects?	No likely significant effects are identified. Good management during the operation of the facility will minimise any potential unforeseen impacts.

**Table 5.2: Potential Impacts by EIA Topic**

EIA Topic	Comment on Potential Impacts
-----------	------------------------------

Population and Human Health	The potential impacts of the proposed activity on human beings are not considered to be significant. The lack of significant sources, pathways and sensitive receptors on and surrounding the facility suggest that, using the proposed operation practices and control measures, no significant impacts to the population or human health are predicted. The licensable activity will safeguard the future employment of current employees at the facility.
Biodiversity / Species and Habitats	The AA screening report undertaken for the site did not identify any significant potential direct or indirect impacts to biodiversity /flora and fauna.
Land and Soils	No significant impact; the facility will continue to be operated in accordance with best practice environmental management systems and mitigation strategies.
Water	With industry best practice and technologies incorporated into operations of the facility, the potential for significant run-off of pollutants is either eliminated or greatly reduced, and no impacts on water are anticipated. Flood mapping shows that the site of the proposed facility is not at risk of flooding. Wastewater produced on site will continue to be discharged to the municipal foul water network for transfer to Bray Pumping Station and onwards for treatment to the Shanganagh Treatment Works. It is expected that current conditions of a discharge licence will be incorporated into the waste licence.
Air & Climate	During operations, there is potential for plastic-fines production. The risk of this will continue to be minimised through the indoor processing of plastic containers within an enclosed warehouse in a controlled manner and the management of best practice housekeeping and cleaning systems.
Noise & Vibration	The site is located in the Oldcourt Industrial Park. There are no noise emissions above 55 dBA Leq from the site. No noise from the daily operation of the plant can be heard outside the Industrial Park and there have been no noise complaints in 2 years of operation. No significant impact is therefore anticipated as the processing methodology will not change.
Material Assets: Built Environment	The facility is connected to existing public services (water mains and utilities). The facility is currently operating under an existing waste facility permit. No significant impacts are anticipated in relation to the built environment.
Material Assets: Transportation	There will be no significant long-term impact on local traffic movements due to the relatively small-scale changes to the activities on site. During the operation, appropriate traffic management and signage will remain in place to ensure safe access and egress from the site, and the safety of other road users. This signage is in place as the site and estate has been operating for several years.
Waste Management	<p>The facility is an existing waste management facility operating under a Waste Facility Permit issued by Wicklow County Council (WFP-WW-18-0043-010). Future management at the facility will be conditioned by a Waste Licence to be issued by the Agency. The maximum tonnage to be accepted will be limited to 1,650 tonnes of packaging waste. The primary focus of activity at the site is the refurbishment of IBC containers and drums. Where a container is unsuitable for refurbishment, material (plastic and steel) is segregated and transfer to authorised waste recovery/recycling facilities.</p> <p>No significant changes are anticipated by the application for a waste licence to accept 15 01 10*.</p> <p>In terms of general waste management, a segregated system is in place, maximising the on-site collection of recyclable waste.</p>
Cultural Heritage	The proposed changes to activities on site will not give rise to any significant impacts on cultural heritage.

Landscape	No significant effects are anticipated as the site currently operates under a Waste Facility Permit at the locations. The site is located within an existing urban and industrial/commercial area and will not give rise to any significant landscape or visual impacts. There are no protected views or designated scenic routes pertaining to the site, and there will be no significant change in terms of site visibility.
Interactions	No significant effects are anticipated when considering interactions between all factors considered.

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## 6 CONCLUSIONS AND RECOMMENDATIONS

### 6.1 Conclusions

The proposed activities to be undertaken at the Packaging Laundry site are evaluated to determine the need for an Environmental Impact Assessment. A determination is made based on the characteristics of the proposal and the site location sensitivity. The following conclusions are made:

- The proposed project (to accept List of Waste Code 15 01 10\*) is not a development for which an EIA is mandatory.
- In terms of scale, the proposed waste acceptance (1,650 tonnes per annum) falls significantly below the threshold set out in Class11(b) in Part 2 of Schedule 5 of the Regulations.
- A Sub Threshold EIA Screening Assessment was completed and examined the proposed development in terms of Characteristics of the Proposed Development, Location of Proposed Development and Characteristics of Potential Impacts.
- An EIA Screening exercise was conducted to determine the potential for the proposed activity to have significant environmental effects or not on the surrounding environment. The report concluded that the characteristics of the proposed licensed facility are not of a nature and scale that will give rise to significant effects on the environment by way of its scale, function or processes.
- In terms of other environmental sensitivities, e.g. landscapes/sites of historical, cultural or archaeological significance, the proposed licensed facility will not give rise to any significant effects, given its location.
- No impact interactions have been identified and it is considered that any minor impacts will be avoided through the continued implementation of industry best working practices.

No significant negative effects on the environment have been identified in the course of the EIAR screening process and the overall conclusion and recommendation of this screening exercise is therefore that there is no requirement for Environmental Impact Assessment of the proposed project.

### 6.2 Final Comments and Recommendations

The above conclusions have regard for current operational practices and procedures that are followed during day to day operations at the facility which has operated under a waste facility permit since 2018. It is now proposed that activity at the site will be regulated by the Environmental Protection Agency. Best practice site management and pollution prevention measures will continue to be implemented. Future operations at the facility will be conditioned by a waste licence to be issued by the Agency.

This screening exercise was completed in relation to the aspects of the environment with the potential to be significantly affected by the future activity at the site as covered by the Licence. Having regard to the characteristics of proposed activity and the site location, no impact types have been identified which would give rise to likely significant effects on the environment.

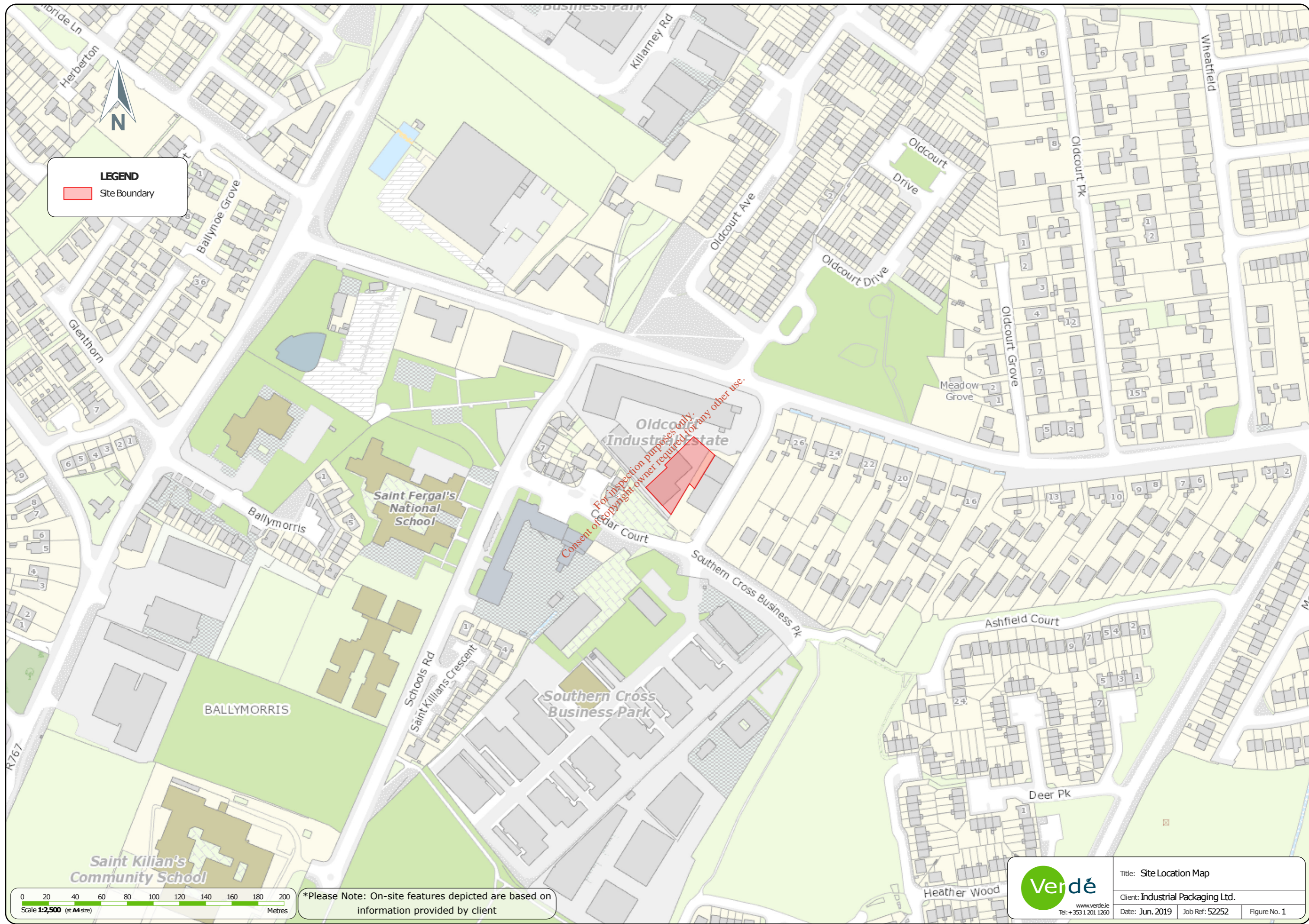
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## FIGURES





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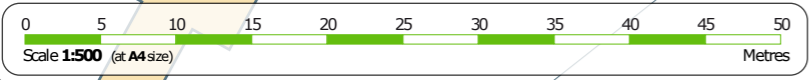
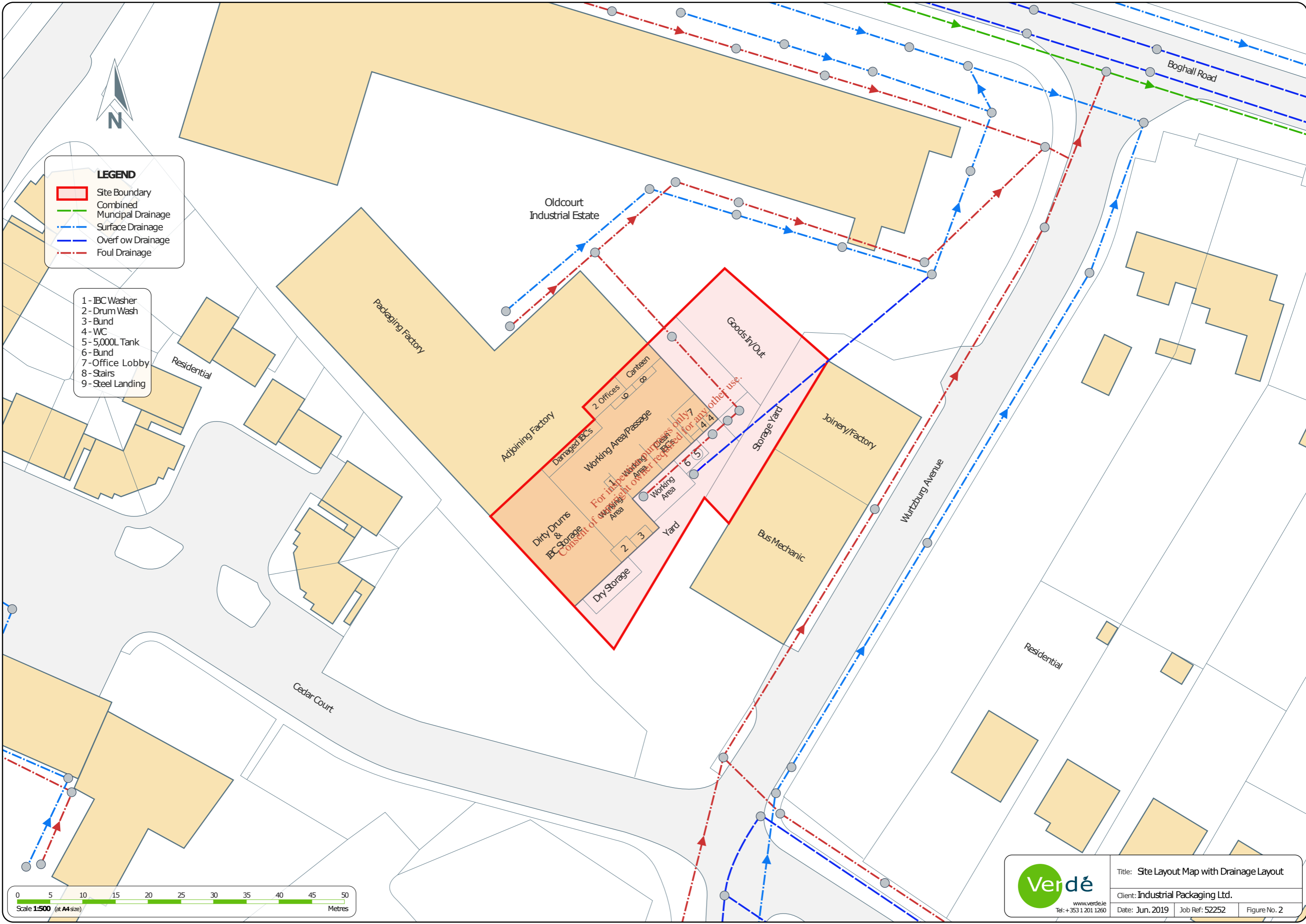




**LEGEND**

- Site Boundary
- Combined Municipal Drainage
- Surface Drainage
- Overflow Drainage
- Foul Drainage

- 1 - IBC Washer
- 2 - Drum Wash
- 3 - Bund
- 4 - WC
- 5 - 5,000L Tank
- 6 - Bund
- 7 - Office Lobby
- 8 - Stairs
- 9 - Steel Landing



**Verde**  
www.verde.ie  
Tel: +353 1 201 1260

Title: Site Layout Map with Drainage Layout  
Client: Industrial Packaging Ltd.  
Date: Jun. 2019 Job Ref: 52252 Figure No. 2



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# APPENDIX A

## DESKTOP STUDY MAPS



Figure 1. Historic Six-Inch Map (OSi: 1837-1852)



Figure 2. Historic 25-Inch Map (OSi: 1888-1913)



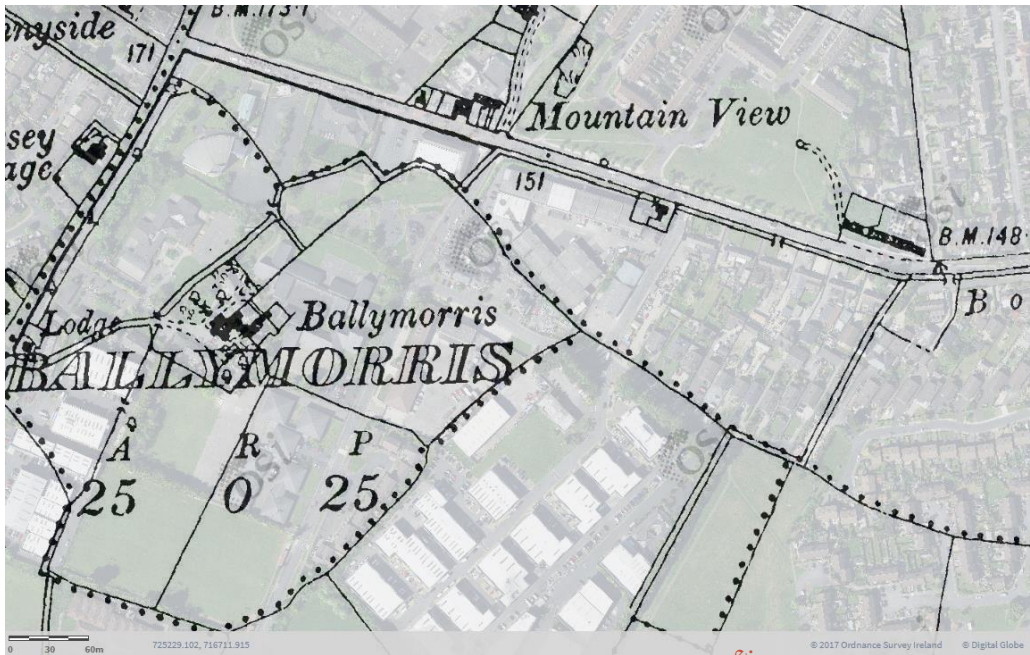


Figure 3. 6-Inch Cassini Map (OSi: 1830-1930)

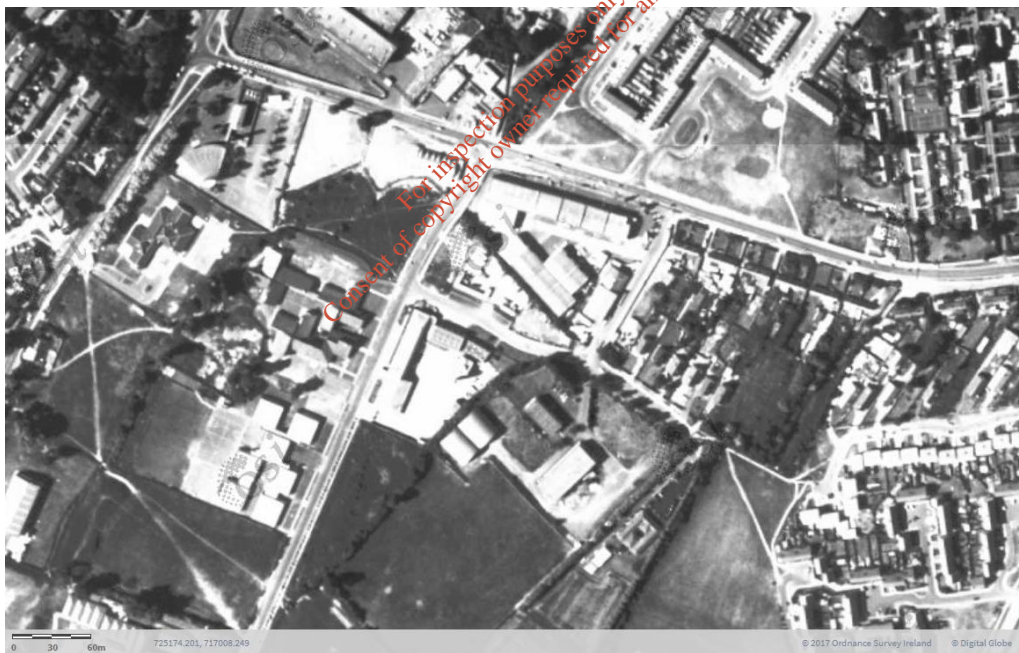


Figure 4. Aerial Orthophotography (OSi:1995)



Figure 5. Aerial Photography (OSi: 2000)



Figure 6. Aerial Photography (OSi: 2005)





Figure 7. Aerial Imagery (Digital Globe 2011-2013)



Figure 8. Aerial Imagery (OSi Premium: 2017)



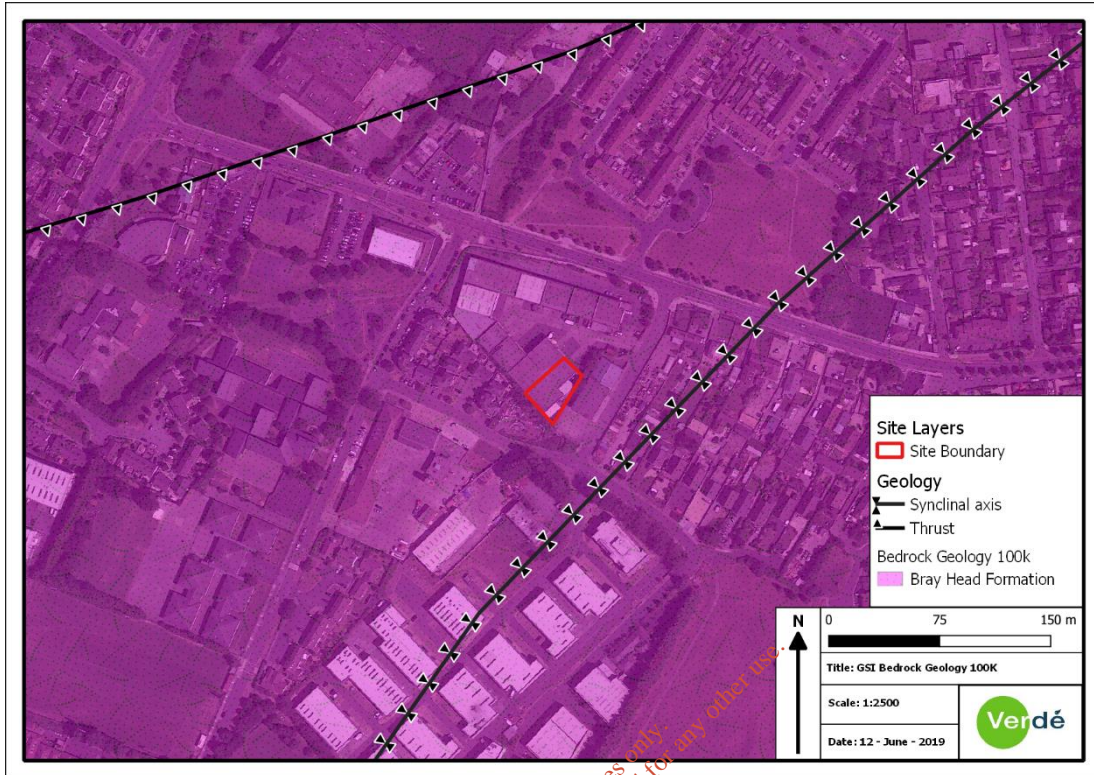


Figure 9. GSI Bedrock Geology 100K Map (GSI 2019)



Figure 10. GSI Groundwater Aquifer Classification (GSI 2019)





Figure 11. Groundwater Vulnerability Classification (GSI) and River Locations (EPA).



Figure 12. EPA Soil Classifications (EPA 2019)

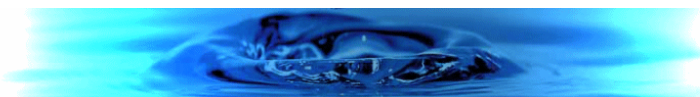




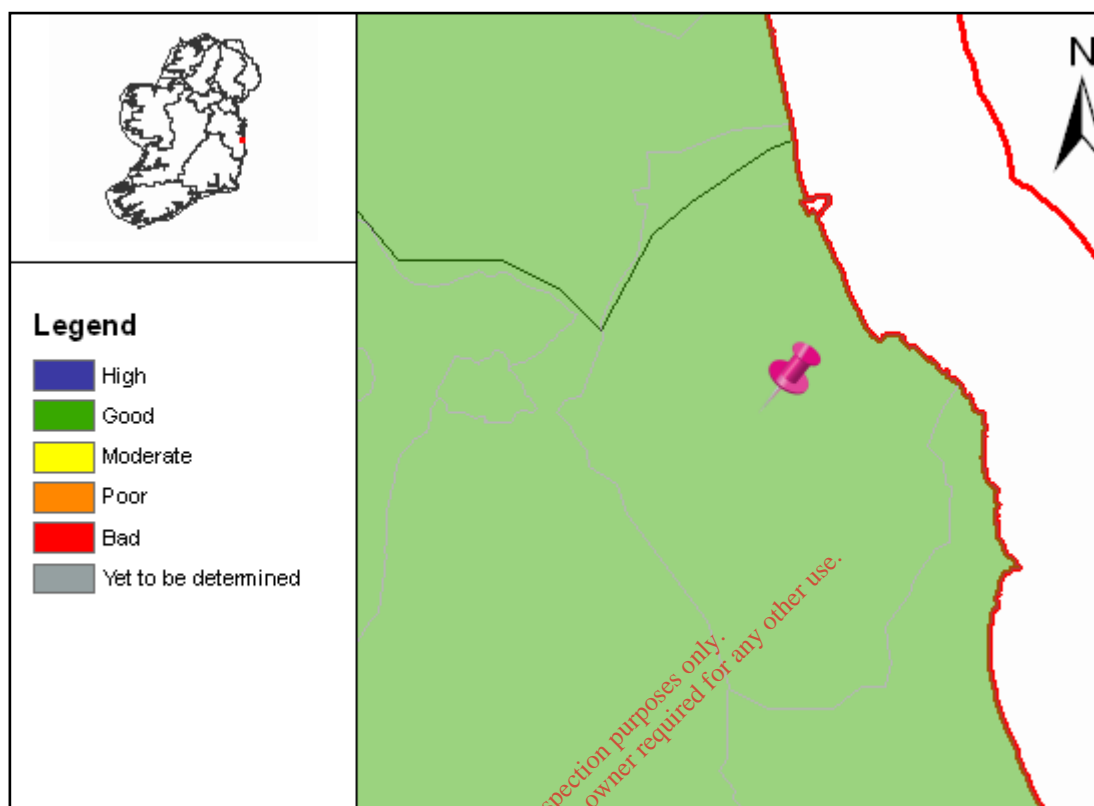
Figure 13. GSI Groundwater Vulnerability Map with Groundwater Well Locations (GSI 2019).

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# APPENDIX B WATER FRAMEWORK DIRECTIVE DOCUMENTATION



## Full Report for Waterbody Bray Urban



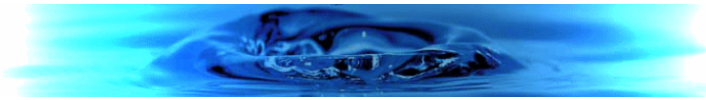
River Basin Management Plans (RBMPs) have been published for all River Basin Districts in Ireland in accordance with the requirements of the Water Framework Directive. The WaterMaps viewer is an integral part of the River Basin Management Plan and provides access to information at individual waterbody level and at Water Management Unit level for all the River Basin Districts in Ireland.

The following report provides summary plan information about the selected waterbody (indicated by the pin in the map above) relating to its status, risks, objectives, and measures proposed to retain status where this is adequate, or improve it where necessary. Waterbodies can relate to surface waters (these include rivers, lakes, estuaries [transitional waters], and coastal waters), or to groundwaters. Other relevant information not included in this report can be viewed using the WaterMaps viewer, including areas listed in the Register of Protected Areas.

You will find brief notes at the bottom of some of the individual report sheets that will help you in interpreting the information presented. More detailed information can be obtained in relation to all aspects of the RBMPs at [www.wfdireland.ie](http://www.wfdireland.ie).

Date Reported to Europe: July 2010

Date Report Created 12/06/2019



**Summary Information:**

**Water Management Unit:** N/A  
**WaterBody Category:** Groundwater Waterbody  
**WaterBody Name:** Bray Urban  
**WaterBody Code:** IE\_EA\_G\_034  
**Overall Status:** Good  
**Overall Objective:** Protect  
**Overall Risk:** 1b Probably At Risk  
**Heavily Modified:** No



Report data based upon final RBMP, 2009-2015.

The information provided above is a summary of the principal findings related to the selected waterbody. Further details and explanation of individual elements of the report are outlined in the following pages.

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Date Reported to Europe: July 2010

Date Report Created 12/06/2019



### Chemical and Quantitative Status Report

**Water Management Unit:** N/A  
**WaterBody Category:** Groundwater Waterbody  
**WaterBody Name:** Bray Urban  
**WaterBody Code:** IE\_EA\_G\_034  
**Overall Status Result:** Good  
**Heavily Modified:** No



Status Element Description		Result
<b>Status information</b>		
INS	Status associated with saline intrusion into groundwater	N/A
DWS	Status associated with exceedances of water quality above specific standards	N/A
DS	Chemical status of groundwater due to pressure from diffuse sources of pollution	N/A
CLS	Chemical status of groundwater due to pressure from contaminated soil or land.	N/A
MS	Chemical status of groundwater due to pressure from mine sites (active or closed).	N/A
UAS	Chemical status of groundwater due to pressures from urban areas	N/A
GWS	General groundwater quality status	N/A
RPS	Status associated with MRP loading to rivers	N/A
TNS	Status associated with nitrate loading to transitional and coastal waters	N/A
SWS	Overall status associated with nutrient loadings to rivers and transitional and coastal waters	N/A
SQS	Status associated with dependant surface water quantitative status	N/A
GDS	Groundwater dependant terrestrial ecosystems status	N/A
QSO	Quantitative status overall	Good
CSO	Chemical status overall	Good
OS	Overall status	Good

GS -HC : Good status High Confidence  
 GS- LC : Good status Low Confidence  
 n/a - not assessed

**Status**

By 'Status' we mean the condition of the water in the waterbody. It is defined by its chemical status and quantitative status, whichever is worse. Groundwaters are ranked in one of 2 status classes: Good or Poor.

You can read more about status and how it is measured in our RBMP Document Library at [www.wfdireland.ie](http://www.wfdireland.ie) (Directory 15 Status).

Date Reported to Europe: July 2010

Date Report Created 12/06/2019



**Risk Report**

**Water Management Unit:** N/A  
**WaterBody Category:** Groundwater Waterbody  
**WaterBody Name:** Bray Urban  
**WaterBody Code:** IE\_EA\_G\_034  
**Overall Risk Result:** 1b Probably At Risk  
**Heavily Modified:** No

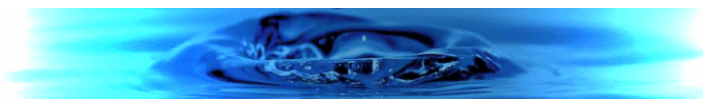


<b>Risk Test Description</b>		<b>Risk</b>
<b>Groundwater Dependent Terrestrial Ecosystems</b>		
TE	GWDTE Risk	N/A
<b>Groundwater Quality</b>		
DIF	Diffuse Elements (General) Risk	N/A
DW	Drinking Waters Risk	N/A
INT	Intrusions Risk	N/A
WB	Water Balance Risk	N/A
<b>Groundwater Quality (General)</b>		
GQ	General Groundwater Quality Risk	N/A
<b>Groundwater Quality (Point Risk)</b>		
CL	Contaminated Land Risk	N/A
LF	Landfill Risk	N/A
MI	Mine Risk	N/A
QY	Quarry Risk	N/A
UR	Urban Risk	N/A
UW	UWWT Risk	N/A
<b>GW Diffuse Risk Sources</b>		
WB3	Mobile Nutrients (NO3)	N/A
WB4	Mobile Chemicals	N/A
WB5	Clustered OSWTs and leaking urban sewerage systems	N/A
<b>GW Hydrology</b>		
WB1	Water balance - Abstraction	N/A
WB2	Abstraction - Intrusion	N/A

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<b>GW Point Risk Sources</b>		
WB10	Risk from Point sources of pollution - Contaminated Land	N/A
WB11	Risk from Point sources of pollution - Trade Effluent Discharges	N/A
WB12	Risk from Point sources of pollution - Urban Wastewater Discharges	N/A
WB6	Risk from Point sources of pollution - Mines	N/A
WB7	Risk from Point sources of pollution - Quarries	N/A
WB8	Risk from Point sources of pollution - Landfills	N/A
WB9	Risk from Point sources of pollution - Oil Industry Infrastructure	N/A
<b>Overall Risk</b>		
RA	Groundwater Overall - Worst Case	N/A
<b>Risk information</b>		
CLR	Contaminated land risk	1b Probably At Risk
DR	Risk of groundwater due to pressure from diffuse sources of pollution	2a Probably Not At Risk
DWR	Risk associated with exceedances of water quality above specific standards	2b Not At Risk
GDR	Groundwater dependant terrestrial ecosystems risk	2b Not At Risk
GWR	General groundwater quality risk	1b Probably At Risk
INR	Risk associated with saline intrusion into groundwater	2b Not At Risk
LR	Risk due to landfills sites/old closed dump sites	2b Not At Risk
MR	Mines risk	2b Not At Risk
NULL	Diffuse nitrates from agriculture risk	N/A
QR	Risk due to quarries	2b Not At Risk
RA	Revised risk assessment	1b Probably At Risk
RPR	Risk associated with MRP loading to rivers	2a Probably Not At Risk
SQR	Risk associated with dependant surface water quantitative status	2b Not At Risk
SWR	Overall risk associated with nutrient loadings to rivers and transitional and coastal waters	2a Probably Not At Risk
TNR	Risk associated with nitrate loading to transitional and coastal waters	2a Probably Not At Risk
UAR	Risk of groundwater due to pressures from urban areas	1b Probably At Risk
UWR	Risk due to direct discharges of urban wastewater	2b Not At Risk

**Risk**

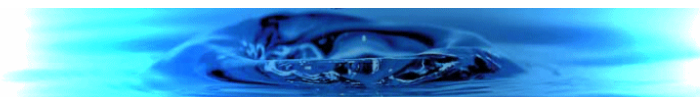
By 'risk' we mean the risk that a waterbody will not achieve good ecological or good chemical status/potential at least by 2015. To examine risk the various pressures acting on the waterbody were identified along with any evidence of impact on water status. Depending on the extent of the pressure and its potential for impact, and the amount of information available, the risk to the water body was placed in one of four categories: 1a at risk; 1b probably at risk; 2a probably not at risk; 2b not at risk. Note that '2008' after the risk category means that the risk assessment was revised in 2008. All other risks were determined as part of an earlier risk assessment in 2005.

You can read more about risk assessment in our 'WFD Risk Assessment Update' document in the RBMP document library, and other documents at [www.wfdireland.ie](http://www.wfdireland.ie) (Directory 31 Risk Assessments).

Date Reported to Europe: July 2010

Date Report Created 12/06/2019





<b>Objectives Report</b>	
<b>Water Management Unit:</b>	N/A
<b>WaterBody Category:</b>	Groundwater Waterbody
<b>WaterBody Name:</b>	Bray Urban
<b>WaterBody Code:</b>	IE_EA_G_034
<b>Overall Objective:</b>	Protect
<b>Heavily Modified:</b>	No



<b>Objectives Description</b>		<b>Result</b>
<b>Objectives information</b>		
OB1	Prevent deterioration objective	Protect
OB2	Restore at least good status objective	No Status
OB3	Reduce chemical pollution objective	No Status
OB4	Protected areas objective	No Status
OBO	Overall objectives - objective	Protect

**Extended timescales**

Extended timescales have been set for certain waters due to technical, economic, environmental or recovery constraints. Extended timescales are usually of one planning cycle (6 years, to 2021) but in some cases are two planning cycles (to 2027).

**Objectives**

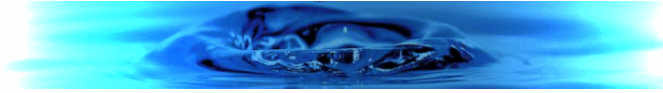
In general, we are required to ensure that our waters achieve at least good status/potential by 2015, and that their status does not deteriorate. Having identified the status of waters (this is given earlier in this report), the next stage is to set objectives for waters. Objectives consider waters that require protection from deterioration as well as waters that require restoration and the timescales needed for recovery. Four default objectives have been set initially:-

- Prevent Deterioration*
- Restore Good Status*
- Reduce Chemical Pollution*
- Achieve Protected Areas Objectives*

These objectives have been refined based on the measures available to achieve them, the latter's likely effectiveness, and consideration of cost-effective combinations of measures. Where it is considered necessary extended deadlines have been set for achieving objectives in 2021 or 2027.

Date Reported to Europe: July 2010

Date Report Created 12/06/2019



**Status Report**

**Water Management Unit:** IE\_EA\_Dargle

**WaterBody Category:** River Waterbody

**WaterBody Name:** Dargle Lower

**WaterBody Code:** IE\_EA\_10\_1275

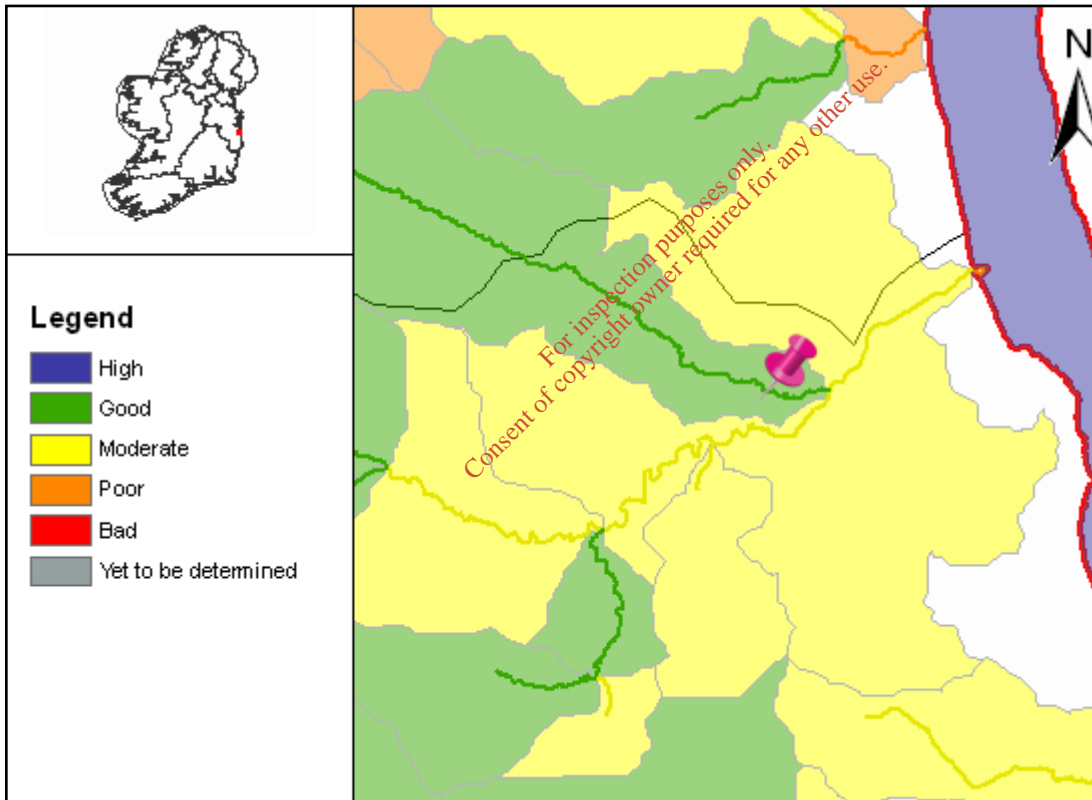
**Overall Status Result:** Moderate

**Heavily Modified:** No



Report data based upon final RBMP, 2009-2015.

The information provided above is a summary of the principal findings related to the selected waterbody. Further details and explanation of individual elements of the report are outlined in the following pages.



Date Report Created 12/06/2019



**Status Report**

**Water Management Unit:** IE\_EA\_Dargle  
**WaterBody Category:** River Waterbody  
**WaterBody Name:** Dargle Lower  
**WaterBody Code:** IE\_EA\_10\_1275  
**Overall Status Result:** Moderate  
**Heavily Modified:** No



Report data based upon final RBMP, 2009-2015.

<b>Status Element Description</b>		<b>Result</b>
<b>Status information</b>		
Q	Macroinvertebrate status	Moderate
PC	General physico-chemical status	Moderate
FPQ	Freshwater Pearl Mussel / Macroinvertebrate status	N/A
DIA	Diatoms status	N/A
HYM	Hydromorphology status	N/A
FIS	Fish status	N/A
SP	Specific Pollutants status (SP)	N/A
ES	Overall ecological status	Moderate
CS	Overall chemical status (PAS)	n/a
EXT	Extrapolated status	N/A
MON	Monitored water body	YES
DON	Donor water bodies	N/A

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n/a - not assessed

**Status**

By 'Status' we mean the condition of the water in the waterbody. It is defined by its chemical status and its ecological status, whichever is worse. Waters are ranked in one of 5 status classes: High, Good, Moderate, Poor, Bad. However, not all waterbodies have been monitored, and in such cases the status of a similar nearby waterbody has been used (extrapolated) to assign status. If this has been done the first line of the status report shows the code of the waterbody used to extrapolate.

You can read more about status and how it is measured in our RBMP Document Library at [www.wfdireland.ie](http://www.wfdireland.ie) (Directory 15 Status).

Date Report Created 12/06/2019

## Wicklow GWB: Summary of Initial Characterisation.

Hydrometric Area Local Authority	Associated surface water bodies	Associated terrestrial ecosystems	Area (km <sup>2</sup> )
Hydrometric Area 10 Wicklow Co. Co. Wexford Co. Co. Dublin Co. Co.	Avoca, Aughrim, Avonbeg, Avonmore, Ballyduff stream, Cloghoge Brook Derry Water, Ow, Glenealy, Glendasan, Templerainy Stream, Redcross, Potters, Three Mile Water, Vartry, Newcastle, Newtownmountkennedy, Dargle, Glencullen, Glenree, Shanganagh, Kill-o-the Grange Stream.	Vartry Reservoir (1771); Avoca River Valley (1748); Avoca Town Marsh (1931); Buckronev - Brittas Dunes and Fen (SAC 729); Magherabeg Dunes (SAC 1766); Dalkey Coastal Zone and Killiney Hill (1206); Ballybetagh Bog (1202); Knocksink Wood (SAC 725); Kilmacanoge Marsh (724); Carriggower Bog (716); Powerscourt Waterfall (1767); Dargle River Valley (1754); The Murrough (730).	1396
<b>Topography</b>	This GWB is a large area within Co. Wicklow and a smaller area of Co. Dublin. The topography is mountainous, comprising the Wicklow and Dublin Mountains. Elevations range from sea level along the coast to high elevations along the western boundary between the Eastern and Southeastern RBDs with the highest peak of 840 m OD at Mullaghcleevaun.		
<b>Geology and Aquifers</b>	Aquifer type(s)	<b>L1:</b> Locally important aquifer, moderately productive only in local zones <b>PI:</b> Poor aquifer, generally unproductive except for local zones <b>Pu:</b> Poor aquifer, generally unproductive	
	Main aquifer lithologies	The Leinster Granites Ordovician Metasediments Cambrian Metasediments <i>Small amounts of Ordovician Volcanics (0.7 %)</i>	
	Key structures.	The Lower Paleozoic rocks have a complex geological history and comprise a large range of rock types including greywackes (turbidites), volcanoclastic sediments, lavas, shales, mudstones, quartzites and cherts. During the Ordovician the Iapetus Ocean began to close and volcanoes formed adjacent to the continental margins, giving rise to a complex suite of volcanic and deep-water sediments. As two continents collided, the accumulated sediments were squeezed up to form a chain of mountains (Caledonian Orogeny). These rocks are thus highly folded and faulted with several phases of deformation. Large granite plutons were intruded and the surrounding rocks have been metamorphosed on a regional scale, transforming the original shales and sandstones and giving the rocks their pervasive fabric or cleavage. There are varying degrees of rock deformation, which has influenced the bedrock permeability. Rocks deform mainly by folding and faulting; both of which are associated with fracturing and permeability development.	
	Key properties	The area includes varied hydrogeological settings. In general there are three main areas of consideration: the Granites are considered to be a PI aquifer, the majority of the Ordovician metasediments are L1, and the other Lower Paleozoic rocks are classified as PI and Pu aquifers. In addition to the variety in these rock types, the topography is very varied, with mountainous granite areas in the west and areas of low-lying land towards the coast. The topographic slope will influence the hydraulic gradient in the aquifer, which in turn will influence the velocity and volume of groundwater flow. The Ordovician Metasediments are one of the better aquifers within this GWB and a number of small public supplies are abstracted from these rocks. GSI source protection reports have been written for the following two examples: The Roundwood public water supply is located in the Maulin Formation (Ordovician Metasediments). Pumping Tests from PW1 and 2 suggest a transmissivity of about 30 m <sup>2</sup> /d. (Woods 2003) The underlying aquifer at Redcross, the Kilmacrea Formation (Ordovician Metasediments) is composed of fractured and weathered shales. Analysis of the 12 hour pumping test provided an apparent transmissivity of about 32 m <sup>2</sup> /d. There is a probable zone of higher permeability close to the surface, and the permeability decreases with increasing depth below ground level. (Woods 2003)	
Thickness	The majority of groundwater flow will occur in the top few metres. This flow is mostly in along a weathered zone in a lateral direction towards rivers and springs. In some instances a greater degree of structural deformation may provide a fracture network which will allow groundwater movement at greater depths. Only flow in isolated fractures is expected below 30m.		
<b>Overlying Strata</b>	Lithologies	Till ('boulder clay') is the most widespread subsoil in the groundwater body. Several types of till occur. South of Wicklow town the dominant type is Till derived from Lower Paleozoic rocks. There are some smaller areas of till derived from granites in the Western areas of the body and some gravel deposits along river channels. North of Wicklow there is a greater variety of till types, although the Lower Paleozoic and Granite till are still found along the central and western areas of the body respectively. There is greater variety in sediment deposition in the east of the body where there are areas of gravel deposits, tills derived from limestones and Irish Sea Till.	
	Thickness	The tills are very thin in mountainous areas. Thickness increases further down slope and also towards the southeast.	
	% Area aquifer near surface	High - there are large areas of outcrop present in the higher altitudes of the Wicklow Mts.	
	Groundwater Vulnerability	Mostly Extreme above 200mOD. Below this the vulnerability is mainly High with some smaller areas of Moderate and Low in places along the coast and southeast.	

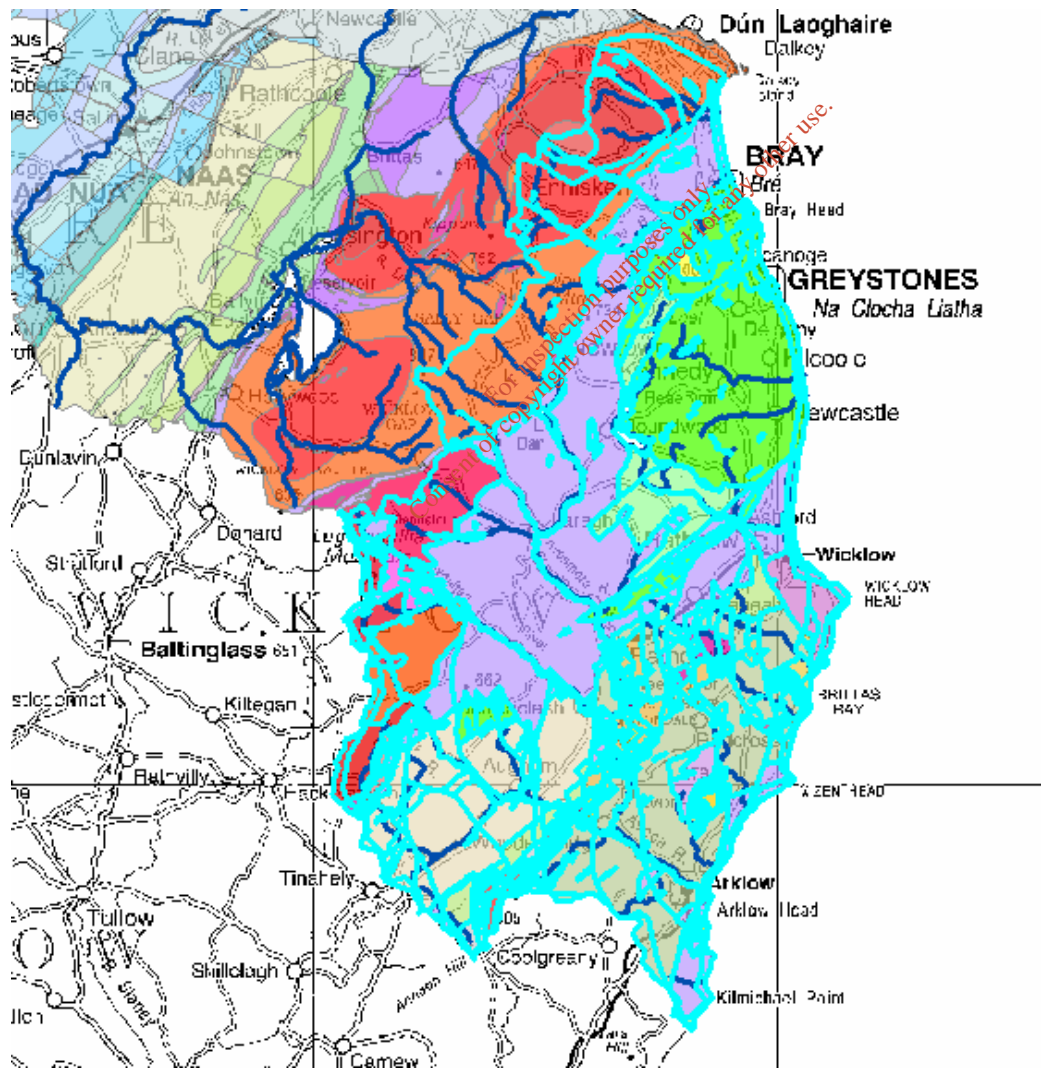
<b>Recharge</b>	Main recharge mechanisms	The dominant recharge process will be diffuse recharge from water percolating through the overlying tills and into the aquifer. High rates of potential recharge are expected in the hilly areas where there are very thin subsoils and high rainfall. A large portion of this potential recharge will be rejected because the rocks in this area are considered to be poor aquifers with low storativity. In addition, the steep slopes in the area will increase surface runoff. Therefore the rapid runoff component to streams will be higher, which must be taken into account in recharge calculations. The very high drainage density in the area gives an indication of this. The drainage density is lower in the Lower Paleozoic rocks (0.687km/km <sup>2</sup> ) than in the Granites (1.021km/km <sup>2</sup> ).
	Est. recharge rates	[Information to be added at a later date]
<b>Discharge</b>	Springs and large known abstractions	GSI Source Reports – Redcross (220), Roundwood (185) EPA Sources Register – Location (Abstraction (m <sup>3</sup> /d)) Glencullen (Bore No. 3) (250), Glencullen (Bore No. 4) (100), Bulford Farm (70), Windgates/Tempelcarrig (70), Bardarrig (34), Ballycoogue (27), Johnstown/Thomastown (18), Kirikee (13), Thomastown, Ballycoogue, Brittas Bay (North), Laragh/Annamore PWS (@ Raheen) (374), Rathdrum (560), Knockananna (39), Aughrim/Annacurra (375),
	Main discharge mechanisms	Groundwater will discharge directly to the sea along the coast. The GWB will also discharge to the over lying streams and rivers as baseflow. The proportion of river flow that is baseflow will vary through out the area. Mountainous rivers have a “flashy” profile and rivers on slopes lower down have a flatter profile. The geomorphology also plays a role in defining the flow characteristics of the rivers. There are a large number of small springs in the area. These are located at the foot of hills at the break in slope, where the water table comes to the surface.
	Hydrochemical Signature	Five County Council sources located in the granite show that the groundwater is a calcium bicarbonate type and is <b>soft to moderately hard</b> (50–250 mg/l CaCO <sub>3</sub> ). Six Council sources sampled for the Ordovician Rocks (data also available for several other areas) show the groundwaters are generally of calcium bicarbonate type, and <b>soft to moderately soft</b> (20–80 mg/l CaCO <sub>3</sub> ). Some areas in east Wicklow, around Enniskerry and Ashford, show slightly higher hardness and alkalinity, probably because the overlying tills, sands and gravels include limestone clasts, which chemically alter the recharge. Low conductivity values 130 - 220
<b>Groundwater Flow Paths</b>	The majority of groundwater flow in this aquifer will take place in the upper 3m of the rocks. This will be lateral flow towards discharge point such rivers and streams. Deeper groundwater flow is possible and deep-water strikes are often encountered (between 10 and 40 m.b.g.l.) but they are more isolated features located along open fractures, which allow groundwater flow. Regional groundwater flow paths are not considered to develop, as the rocks do not have sufficient transmissivity to transport water over long distances. Typical groundwater flow paths will be in the order of a couple of hundred metres, with discharge occurring to the closest surface water feature.	
<b>Groundwater &amp; surface water interactions</b>	There will be highly varied groundwater and surface water interaction processes occurring within the large area of this groundwater body. The nature of these interactions will be determined by local factors and it is therefore impossible to generalize over such a large area. Such local influences could include the depths and permeability of subsoil, slope, local permeability of the rock, overlying surface water bodies and human alterations to the environment. Such interactions should be considered on a local scale where the importance of them is most critical e.g. at protected areas.	
<b>Conceptual model</b>	This GWB is a large area within Co. Wicklow and a smaller area of Co. Dublin. The topography of the area is mountainous, comprising the Wicklow and Dublin Mountains. The GWB is composed primarily of low permeability rocks, although localised zones of enhanced permeability do occur. The boundaries of the GWB are defined by the extent of Hydrometric Area 10. Groundwater flow occurs mostly in a shallow upper weathered zone; deeper groundwater flow is possible along fractures, joints and major faults. Recharge occurs diffusely through the subsoils and via outcrops. There are large areas where the rock is close to surface, which would suggest high potential recharge values, but calculations must consider the effect of rejected recharge from the lower permeability rocks. The aquifers within the GWB are generally unconfined, but may become locally confined where the subsoil is thicker and/or of lower permeability. Groundwater flow is considered to recharge and discharge on a local scale. Drainage density values suggest shorter flow paths in the granites than on the flatter Lower Paleozoics. Groundwater discharges to the numerous small streams crossing the aquifer, to springs and seeps and also directly to the Irish Sea.	
<b>Attachments</b>		
<b>Instrumentation</b>	Stream gauge: 10001, 10002, 10003, 10004, 10005, 10006, 10007, 10008, 10009, 10010, 10012, 10013, 10014, 10015, 10016, 10017, 10018, 10019, 10020, 10021, 10022, 10023, 10024, 10025, 10026, 10027, 10028, 10029, 10030, 10031, 10032, 10033, 10034, 10035, 10036, 10037, 10070, 10071 Borehole Hydrograph: Some are present within the area of the GWB but they measure the Groundwater Levels in Gravel Aquifers. EPA Representative Monitoring boreholes: Roundwood (WIC027), Redcross (WIC026)	

<b>Information Sources</b>	<p>McConnell B, Philcox M, Sleeman A G, Stanley G, Flegg A M, Daly E P &amp; Warren W P. 1994. <i>A Geological description to accompany the Bedrock Geology 1:100,000 Scale Map Series, Sheet 16, Kildare-Wicklow</i>. Geological Survey of Ireland, 70 pp.</p> <p>Tietzsch-Tyler D &amp; Sleeman A G. (1994) <i>Geology of Carlow - Wexford</i>. A geological description to accompany the Bedrock Geology 1:100,000 map series, Sheet 19, Carlow - Wexford. Geological Survey of Ireland.</p> <p>Woods L &amp; Wright G R (2003) Redcross Water Supply. Groundwater Source Protection Report. Wicklow Groundwater Protection Scheme. GSI report to Wicklow Co. Co.</p> <p>Woods L &amp; Wright G R (2003) Roundwood Water Supply. Groundwater Source Protection Report. Wicklow Groundwater Protection Scheme. GSI report to Wicklow Co. Co.</p> <p>Wright G R &amp; Woods L (2003) <i>County Wicklow Groundwater Protection Scheme</i>. Report to Wicklow County Council. Geological Survey of Ireland</p>
<b>Disclaimer</b>	Note that all calculation and interpretations presented in this report represent estimations based on the information sources described above and established hydrogeological formulae

Formation Name	Code	Description	Rock Unit Group	Aquifer Classification
Aplite	apl		Granites & other Igneous Intrusive rocks	PI
Appinite	app		Granites & other Igneous Intrusive rocks	PI
Arklow Head Formation	AH	Black slates overlain by rhyolitic tuffs	Ordovician Metasediments	Pu
Arklow Head Formation & Felsic volcanics	fvAH	Black slates overlain by rhyolitic tuffs	Ordovician Metasediments	Pu
Avoca Formation	AV	Rhyolitic volcanics, dark grey slate	Ordovician Metasediments	Pu
Avoca Formation & Felsic volcanics	fvAV	Rhyolitic volcanics, dark grey slate	Ordovician Metasediments	Pu
Avoca Formation & Intermediate volcanics	ivAV	Rhyolitic volcanics, dark grey slate	Ordovician Metasediments	Pu
Ballybeg Member	MNbb	Dark grey semi-pelitic, psammitic schist	Ordovician Metasediments	LI
Ballylane Formation	BY	Green & grey slate with thin siltstone	Ordovician Metasediments	PI
Ballymoyle Formation	BL	Rhyolitic volcanics, grey & black slate	Ordovician Volcanics	PI
Ballymoyle Formation & Felsic volcanics	fvBL	Rhyolitic volcanics, grey & black slate	Ordovician Metasediments	PI
Ballymoyle Formation & Quartzite	qzBL	Rhyolitic volcanics, grey & black slate	Ordovician Volcanics	PI
Barravore Aplogranite	LqBv	Fine-grained, muscovite-rich aplogranite	Granites & other Igneous Intrusive rocks	PI
Bray Head Formation	BR	Greywacke & quartzite	Cambrian Metasediments	PI
Bray Head Formation & Quartzite	qzBR	Greywacke & quartzite	Cambrian Metasediments	PI
Butter Mountain Formation	BZ	Dark slate-schist, quartzite & coticule	Ordovician Metasediments	LI
Carrawaystick Aplite	LqCw	White, saccharoidal garnetiferous aplite	Granites & other Igneous Intrusive rocks	PI
Croghan Kinshelagh Granite	Ck	Grey to pink even-grained granite	Granites & other Igneous Intrusive rocks	PI
Devils Glen Formation	DG	Greywacke & shale	Cambrian Metasediments	PI
Devils Glen Formation & Mafic volcanics	mvDG	Greywacke & shale	Cambrian Metasediments	PI
Diorite	Di		Granites & other Igneous Intrusive rocks	PI
Dolerite	D		Granites & other Igneous Intrusive rocks	PI
Glencullen River Formation	GL	Buff-coloured tuff & greywacke	Ordovician Metasediments	PI
Glendalough Adamellite	LqGd	Adamellite with microcline phenocrysts	Granites & other Igneous Intrusive rocks	PI
Granite (undifferentiated)	Gr		Granites & other Igneous Intrusive rocks	PI
Kilmacrea Formation	KA	Dark grey slate, minor pale sandstone	Ordovician Metasediments	LI
Kilmacrea Formation & Felsic volcanics	fvKA	Dark grey slate, minor pale sandstone	Ordovician Metasediments	PI
Knockree Member	MNkr	Quartzite	Ordovician Metasediments	LI
Maulin Formation	MN	Dark blue-grey slate, phyllite & schist	Ordovician Metasediments	LI
Maulin Formation & Intermediate volcanics	ivMN	Dark blue-grey slate, phyllite & schist	Ordovician Metasediments	LI
Maulin Formation & Mafic volcanics	mvMN	Dark blue-grey slate, phyllite & schist	Ordovician Metasediments	LI
Maulin Formation & Quartzite	qzMN	Dark blue-grey slate, phyllite & schist	Ordovician Metasediments	LI
Microgranite	mGr		Granites & other Igneous Intrusive rocks	PI
Moneyteige Member	BYmt	Metagreywackes, slates & metadolerites	Ordovician Metasediments	PI



Oaklands Formation	OA	Green, red-purple, buff slate, siltstone	Ordovician Metasediments	LI
Percys Table Granodiorite	LqPt	Aphyric granodiorite	Granites & other Igneous Intrusive rocks	PI
Roundwood Member	MNrw	Basalt breccia	Ordovician Metasediments	LI
Serpentinite	S		Granites & other Igneous Intrusive rocks	PI
Tober Colleen Formation	TC	Calcareous shale, limestone conglomerate	Dinantian Upper Impure Limestones	PI
Type 1 Granodiorite	Nt1	Fine-grained granodiorite to granite	Granites & other Igneous Intrusive rocks	PI
Type 2 Equigranular Granite	Tw2e	Pale, fine to coarse-grained granite	Granites & other Igneous Intrusive rocks	LI
Type 2 Microcline Porphyritic Granite	Tw2m	Granite with microcline phenocrysts	Granites & other Igneous Intrusive rocks	PI
Type 2 Sparsely Porphyritic Granite	Tw2i	Granite, some microcline phenocrysts	Granites & other Igneous Intrusive rocks	PI
Type 2e equigranular Granite	Nt2e	Pale grey fine to coarse-grained granite	Granites & other Igneous Intrusive rocks	PI
Type 2p microcline porphyritic Granite	Nt2p	Granite with microcline phenocrysts	Granites & other Igneous Intrusive rocks	PI
Type 3 muscovite porphyritic Granite	Nt3	Granite with muscovite phenocrysts	Granites & other Igneous Intrusive rocks	PI
Type 4 muscovite/microcline porphyritic Granite	Nt4	Muscovite-microcline porphyritic granite	Granites & other Igneous Intrusive rocks	PI
Wicklow Head Formation	WH	Silver-grey mica-schist	Ordovician Metasediments	PI







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# APPENDIX C

## SITE PERMITS & LICENSES

# Waste Facility Permit

Issued by:



Wicklow County Council

Waste Management Act 1996  
and  
Waste Management (Facility Permit and Registration) Regulations 2007

Waste Facility Permit No: WFP-WW-18-0043-01  
Applicant: Packaging Laundry Ltd.  
Facility location: 4C OldCourt Business Park, Boghall Rd, Bray, Co. Wicklow  
Date of issue: 30<sup>th</sup> May 2018  
Expiry date: 29<sup>th</sup> May 2023

Signed:

Theresa O'Boe

Date:

30/5/2018

Note 1: The granting of this Waste Facility Permit, and any condition imposed by it, does not exempt the holder of the Waste Facility Permit from complying with the statutory obligations of any relevant legislation, including water pollution, air pollution, waste, litter and planning legislation or legal liabilities under any other enactment or regulations whatsoever. The permit holder is legally responsible for all aspects of the operation and management of the Permitted activity.

Note 2: Should the permit holder wish to continue to operate after the date of expiry, an application to review the facility permit shall be made to Wicklow County council in accordance with Article 31 (1) of the Regulations no later than 60 working days before the date of the expiry of this Waste Facility Permit.

Please note: Appendices are subject to change.

Note 3: Should the permit holder not wish to continue waste activities at any time or after the date of expiry of this Waste Facility Permit, the holder shall by notice in writing to Wicklow County council, surrender the permit in accordance with Article 29 of the Regulations.

## Contents

### CONDITION

1. CONDITION 1 - SCOPE
2. CONDITION 2- MANAGEMENT OF THE ACTIVITY
3. CONDITION 3 - RECORD KEEPING AND REPORTING
4. CONDITION 4 - SITE INFRASTRUCTURE, ACCESS AND OPERATION
5. CONDITION 5 - WASTE HANDLING
6. CONDITION 6 - ENVIRONMENTAL PROTECTION AND EMISSIONS
7. CONDITION 7 - ACCIDENT PREVENTION AND EMERGENCY RESPONSE
8. CONDITION 8 - CHARGES AND FINANCIAL PROVISIONS
9. CONDITION 9 - RESTORATION AND AFTERCARE

Please note: Appendices are subject to change.

## GENERAL

Wicklow County Council having granted a Waste Facility Permit, Register Reference No. WFP-WW-18-0043-01 to Packaging Laundry Ltd.

Herein after called the Waste Facility Permit holder.

At;

<b>Address:</b>	The Burren
	Manor Avenue
	Greystones
	County Wicklow

Operating a facility at:

<b>Address:</b>	4C OldCourt Business Park	
	Boghall Rd	
	Bray	
	County Wicklow	

Issued on:

<b>Date:</b>	30 <sup>th</sup> May 2018
--------------	---------------------------

Expires on:

<b>Date:</b>	29 <sup>th</sup> May 2023
--------------	---------------------------

Subject to the attached schedule of conditions.

This Waste Facility Permit WFP-WW-18-0043-01 and attached conditions, may at any time be reviewed, and subsequently amended should Wicklow County Council consider it necessary.

Signed: \_\_\_\_\_

**Senior Executive Officer,  
Water & Environmental Services.**

Date: \_\_\_\_\_

Please note: Appendices are subject to change.

## Part 1 Activities Waste facility permit

In pursuance of the powers conferred on it by the Waste Management Act 1996 and the Waste Management (Facility Waste facility permit and Registration) Regulations S.I No.821 of 2007 as amended by the Waste Management (Facility Waste facility permit and Registration) (Amendment) Regulations S.I No.86 of 2008, Wicklow County Council under Article 37 of the Regulations hereby grants this Waste Facility Permit to Packaging Laundry, 4C OldCourt Business Park, Boghall Rd, Bray, Co. Wicklow

### Waste Facility Permit Recovery Activities in accordance with the Fourth Schedule, of the Waste Management Acts 1996 to 2010

Class Number	Definition
R 4	Recycling/ reclamation of metals and metal Compounds
R 12	Exchange of waste for submission to any of the operations numbered R 1 to R 11 (if there is no other R code appropriate, this can include preliminarily operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelleting, drying, shredding, conditioning, repackaging, separation, blending or mixing prior to submission to any of the operations numbered R 1 to R 11)

### Class of Activity subject to waste facility permit application to a local authority as per Part I of the third schedule of the Regulations

Class Number	Definition
10 (Principle Activity)	Recovery of non-hazardous waste <50,000 tonnes per annum and with <15% residual to onward Disposal.

Please note: Appendices are subject to change.



## Interpretation

All terms in this Waste facility permit should be interpreted in accordance with the definitions in the Waste Management Act 1996 (the Act) and its associated regulations.

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## CONDITION 1 – SCOPE

- 1.1 The Waste Facility Permit is for the purpose of waste activity authorisation under the Waste Management (Facility Permit & Registration) Regulations S.I. No. 821 of 2007 as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations S.I. No. 86 of 2008 only, and nothing in this Waste facility permit shall be construed as negating the Waste facility permit holder's statutory obligations or requirements under any other enactments or regulations.
- 1.2 The Waste Facility Permit is granted to **Packaging Laundry Ltd.** for the waste activities in accordance with the Third Schedule, Part I of the Waste Management (Facility Permit and Registrations) Regulations 2007, as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations S.I. No. 86 of 2008.
- 1.3 Wicklow County Council may alter the conditions of this Waste Facility Permit where warranted at any stage during its lifespan.
- 1.4 The Waste Facility Permit is granted for **5 years**.
- 1.5 The maximum annual intake of waste to this facility shall not exceed **500 tonnes**, with less than 75 tonnes per annum to be assigned for disposal.
- 1.6 For the purposes of this Waste Facility Permit, the site authorised is the area outlined in red on the Land Registry Map that accompanied the application for this Waste Facility Permit. The authorised activities shall be carried out only within the area outlined.
- 1.7 The permit holder shall ensure that waste which has been processed for recovery shall not be sent disposal, nor shall it be transported, mixed or handled in a manner so as to make it unsuitable for recycling or recovery.
- 1.8 The Waste Facility Permit holder shall ensure that the site is managed, operated and maintained in compliance with the conditions of the Waste Facility Permit.

Please note: Appendices are subject to change.

- 1.10 Any non-conformance with the conditions of this Waste Facility Permit is an offence under Article 43 of the Waste Management (Facility Permit and Registration) Regulations 2007 as amended by the Waste Management (Facility Permit and Registration) (Amendment) Regulations S.I. No. 86 of 2008 and Section 39(9) of the Waste Management Act 1996 for which you may be prosecuted.
- 1.11 Where Wicklow County Council considers that non-compliance with the conditions of this Waste Facility Permit has occurred, it may serve Notice on the Waste Facility Permit Holder to address the non-compliance.
- 1.12 The permit holder shall notify Wicklow County Council in writing of any proposed changes to the information furnished in the application process or any proposed changes to the activity, and shall obtain written approval from Wicklow County Council prior to these changes taking effect. Should the the submission identify a material or significant change in
- A. The nature, extent or focus of the waste activities;
  - B. The nature or extent of any emission;
- a facility permit review application including the relevant fee may be required before the proposed change can be assessed.

**REASON - To clarify the scope of this WASTE FACILITY PERMIT**

Please note: Appendices are subject to change.



## CONDITION 2 – MANAGEMENT OF THE ACTIVITY

- 2.1 The facility shall be adequately manned and supervised at all operating times. It shall be maintained to the satisfaction of Wicklow County Council, and adequate precautions shall be taken to prevent unauthorised access to the facility.
- 2.2 No activities relating to this Waste Facility Permit shall take place outside of the following hours. **08:00 hrs to 18:00 hrs – Monday to Friday.**
- 2.3 All vehicles collecting waste materials from this facility shall hold a **valid Waste Collection Permit**, it is the responsibility of the Waste Facility Permit holder to ensure that this condition is adhered to. The Waste Collection Permit Number and the permit holder's name must be displayed on the vehicle.
- 2.4 The Waste Facility Permit holder is legally responsible for all aspects of the operation including Health & Safety issues and maintenance of the site.
- 2.5 Where Wicklow County Council observes that non-compliance with the conditions of this Waste Facility Permit has occurred, it may serve Notice on the Waste Facility Permit Holder to address the non-compliance or it may temporarily close the facility pending compliance with the conditions.
- 2.6 A copy of this permit shall be maintained on site at all times and a copy is made available to all staff (including replacement personnel) whose duties relate to any condition of this permit.
- 2.7 The permit holder should ensure that authorised staff of Wicklow County Council shall have unrestricted access to the facility at all reasonable times on the production of their identification, for the purposes of Wicklow County Council's functions under the Waste Management Act, 1996, including such inspections, monitoring and investigations as deemed necessary by Wicklow County Council.

Please note: Appendices are subject to change.

- 2.8 Within 3 months of the date of grant of this permit the permit holder shall develop procedures for the following:
- (a) waste inspection
  - (b) waste acceptance and handling
  - (c) waste quarantine
  - (d) waste rejection and notification
  - (e) corrective action

**REASON - To makes provision for the proper management of the facility**

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### CONDITION 3 – NOTIFICATION AND RECORD KEEPING

- 3.1 The Waste Facility Permit holder shall maintain an official site register. The register shall detail the following:
- (a) The dates, times of arrivals and quantities of each waste consignment delivered to the facility.
  - (b) Name of carriers, including details of vehicle registrations.
- 3.2 A separate record shall be maintained to detail the following:
- (a) The quantity and composition of any waste rejected at the site.
  - (b) Details of the destination where the rejected was moved or returned to.
- 3.3 The Waste Facility Permit holder shall maintain a register of any incident that may have the potential to cause environmental pollution.
- 3.4 The Waste Facility Permit holder shall maintain a register of complaints received from members of the public.
- 3.5 In the case where all works at the facility cease and the Waste Facility Permit has expired these records shall be kept at the principal place of business of the Waste Facility Permit holder for a period of 3 years.
- 3.6 The permit holder shall submit to Offaly County Council as the National Waste Collection Permit Office (NWCPO) an **Annual Report (AR)** before the end 28<sup>th</sup> February each year. The completed AR must be submitted online (<https://ar.nwcpo.ie/>) and provide all the information that is required to satisfactorily complete the AR. Failure to submit the AR by the 28<sup>th</sup> February each year will result in the temporary closure of the facility pending the submission of the AR.
- 3.7 The on-line Annual Report, shall include as a minimum the following information and shall be prepared in accordance with any relevant guidelines issued by the NWCPO or Wicklow County Council , the following information;
- (a) For each supplier/waste collector who delivered waste to the facility, in the preceding calendar year, the following summary details are required:
    - (i) Waste Collection Permit Holder Details;
    - (ii) Waste Code
    - (iii) Quantity (in tonnes)
    - (iv) Code of Activity

Please note: Appendices are subject to change.

- (b) Supporting Documentation;
- (i) The management and staffing structure of the facility
  - (ii) Any court Conviction under the Waste Management Act
  - (iii) Any loads rejected as per condition 5.4 below
  - (iv) Reportable incidents during the reporting year
  - (v) All complaints received as per condition 3.4 above
  - (vi) Copy of the public liability & environmental liability insurance policies as per condition 8.3 & 8.4 below.

3.8 All communications shall quote the Waste Facility Permit number and the name of the Waste Facility Permit holder.

3.9 All records required to be made by these standard rules shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- (d) be retained, unless otherwise agreed by Wicklow County Council for at least 3 years from the date when the records were made, or in the case of the following records until Waste facility permit surrender:
  - (i) off-site environmental effects; and
  - (ii) matters which affect the condition of land and groundwater.

3.10 The permit holder shall immediately notify Wicklow County Council by telephone or email of any incident which occurs as a result of the activity that:

- i) Has the potential to contaminate surface or ground water or;
- ii) Poses an environmental threat to air or land or;
- iii) Requires an emergency response by Wicklow County Council or other state agency

**REASON - To provide for the notification of incidents, update information on the activity and to provide for the making of records**

Please note: Appendices are subject to change.

#### CONDITION 4 – SITE INFRASTRUCTURE, ACCESS AND OPERATION

- 4.1 Within two weeks of the date of grant of this Permit, the Permit Holder shall erect a Site Notice Board at the entrance to the facility. The minimum dimension of the board shall be 1200mm by 750mm. The board shall clearly show:
- (a) The name, address and telephone number of the Permit Holder.
  - (b) The permit number and date of grant of the permit.
  - (c) The normal opening hours of the facility.
  - (d) The name, address and telephone number of Wicklow County Council.
- 4.2 The Permit Holder shall maintain adequate security at the facility to prevent unauthorised access
- 4.3 There shall be no casual public access to the facility.
- 4.4 All tanks, containers and drums shall be labelled to clearly identify their contents.
- 4.5 The permit holder shall ensure that adequate storage is available for recovered materials.
- 4.6 A copy of the facility lay-out shall be submitted to Wicklow Fire Services, Bray Station within one month of this permit being issued. This layout shall identify waste storage areas and access/ egress locations.

**REASON - To provide for the protection of the environment.**

Please note: Appendices are subject to change.



## CONDITION 5 – WASTE ACCEPTANCE HANDLING

- 5.1 The maximum quantity of waste to be delivered to the site shall not exceed **500 tonnes per annum**.
- 5.2 This Waste Facility Permit is limited to the processing of the following materials in a combined quantity not exceeding condition 1.5 above; European Waste Catalogue Numbers; **15 01 02 – Plastic Packaging and 15 01 04 – Metallic Packaging**.
- 5.3 All materials arriving at the facility shall be inspected on arrival and only that deemed suitable may be accepted. Any inappropriate or contaminated material must be moved to a Waste Quarantine Area, the location of which will be agreed with Wicklow County Council, from where it shall be removed off-site by the contractor to an authorised facility.
- 5.4 Records shall be maintained of all rejected waste loads leaving the facility. Records of such loads shall include details on the haulier, final destination of reason for rejections.
- 5.5 Recovered waste materials shall only be removed to authorised waste treatment facilities.

**REASON - To provide for the control of nuisances and emissions from the facility and to provide for the protection of the environment.**

Please note: Appendices are subject to change.

## CONDITION 6 - ENVIRONMENTAL PROTECTION AND EMISSIONS

- 6.1 Noise and Vibration Emissions from the activities shall be free from noise and vibration at levels likely to cause annoyance outside the site, as perceived by Wicklow County Council.
- 6.2 The Noise emissions from the facility shall not give rise to noise levels at noise sensitive locations in the vicinity of the activity in excess of:
- (i) 55 dBA Leq, LT during the operating hours
- There shall be no clearly audible tonal component, or impulsive component, in the noise emission from the development at any noise sensitive location.
- 6.3 The Permit Holder must take all necessary measures to collect any solid debris (i.e. plastic off-cuts) that arise from the cutting of plastic bulk containers. In particular, no plastic should enter the drainage system or become windborne. The Waste facility permit holder shall take adequate precautions to prevent undue noise, fumes, dust, mud, grit, untidiness and other nuisances during the course of the work that would result in a significant impairment of, or a significant interference with amenities or the environment beyond the site boundary. **If unacceptable levels occur, the Waste facility permit holder shall abide by Wicklow County Council abatement requirements, which may include immediate cessation of operations.**
- 6.4 The Waste facility permit holder shall take adequate steps to ensure that no material of any sort can fall or be blown from vehicles entering or exiting the facility onto the roadway or adjoining lands.
- 6.5 Neither waste activities nor any other works required as a condition of this Waste facility permit shall be carried out in such a manner that is in contravention of any statutory obligations under the **Wildlife Acts** including those obligations providing for the conservation of protected species and the protection of birds.

**Reason - To control emissions from the site and provide for protection of the environment.**

Please note: Appendices are subject to change.



- 7.1 The Waste facility permit holder shall ensure that an Emergency Response Procedure is in place, which shall address any emergency situation, which may originate on-site. This procedure shall include provision for minimising the effects of any emergency on the environment.
- 7.2 In the event of any spillage of chemicals or hydrocarbon based products on site, the facility manager on site shall immediately,
- Isolate the source of the contamination
  - Designate one or more persons to assist with the clean up using suitable equipment
  - The spillage shall be confined to the local area using appropriate absorbent material
  - Ingress to drains shall be prevented by sealing off drains with an impervious membrane or other suitable device
  - Implement appropriate remedial action to prevent a reoccurrence of the incident
  - Inform Wicklow county Council in writing of any remedial action

**REASON-** To minimise any effect on the environment in the event of an accident or emergency.

Please note: Appendices are subject to change.

## CONDITION 8 – CHARGES AND FINANCIAL PROVISIONS

- 8.1 The Waste Facility Permit Holder shall pay an annual contribution of €250 to Wicklow County Council towards the costs of inspecting, monitoring or otherwise performing any functions in relation to the Waste Facility Permit activity. This payment is due within one month of the date of grant of this permit. As this permit will be issued in June 2018, a half year payment of €125 is required for 2018.
- 8.2 In the event that the frequency or extent of monitoring or other functions carried out by Wicklow County Council needs to be increased for whatever reason, the permit holder should contribute such sums as are determined by Wicklow County Council as to defray these costs.
- 8.3 The permit holder shall effect and maintain a policy of insurance insuring him/her/it as respects any liability on his/her/its part to pay any damages or costs on account of injury to persons or property arising from the activities concerned or for remedial actions following anticipated events (including closure) or accidents/incidents, as may be associated with the carrying on of the activity.
- 8.4 The permit holder shall obtain and maintain public liability & environmental insurance in their name for the operation of the waste facility. The permit holder shall maintain Public Liability Insurance cover to include for sudden/unforeseen pollution for a value of €6.5 million. A copy of the insurance certificate shall be furnished to Wicklow County Council within two months of the date of grant of this permit, thereafter evidence of cover shall be submitted with the Annual Environmental Report. *The permit will be automatically revoked if any part of the insurance is either removed or not renewed.*
- 8.5 The permit holder shall ensure that all insurance policies relating to this facility indemnify Wicklow County Council. The permit will be automatically revoked if any part of the insurance is either removed or not renewed.

**REASON - To offset the costs of administering the Waste Facility Permit and monitoring the activity as the local authority considers necessary for the performance of its functions under the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended).**

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**LOCAL GOVERNMENT (WATER POLLUTION) ACTS, 1977 & 1990, as amended**

**IRISH WATER**

**LICENCE NUMBER (Reg. Ref.): IW-DTS-809938-01**

Irish Water in exercise of the powers conferred on it by the Local Government (Water Pollution) Acts, 1977 & 1990, as amended, hereby grants the under mentioned Licensee, a licence (IW-DTS-809938-01) subject to the conditions stated overleaf, to discharge trade effluent or other matter (other than domestic sewage or storm water) from the under mentioned premises:<sup>1</sup>

**LICENSEE:** Packaging Laundry Limited, The Burren, Manor Avenue, Greystones, Co. Wicklow

**PREMISES:** Packaging Laundry Limited, Unit 4, Oldcourt Business Park, Boghall Road, Bray, Co. Wicklow

**ACTIVITY:** Cleaning & Reconditioning of IBC's for re-use in the market

**SEWER:** IW Sewer at Boghall Rd., Bray, Co. Wicklow

**NATURE OF DISCHARGE:** Trade Effluent arising from cleaning & reconditioning of IBC's

**Signed:**

  
 \_\_\_\_\_  
 Authorised Signatory

**Dated:** 13 December 2017

<sup>1</sup> Note: Appeals

An appeal against the decision made by Irish Water under Section 16 and/or Section 17 of the Local Government (Water Pollution) Act, 1977, as amended by Section 12 and/or 13 of the Local Government (Water Pollution) (Amendment) Act, 1990 may be made to An Bord Pleanála under Section 15 of the Local Government (Water Pollution) (Amendment) Act, 1990 by a person to whom a Licence was granted (with or without conditions).

1. The Appeal should be made in writing and should state subject matter of the Appeal and the grounds of Appeal.
2. Appeals should be addressed to the Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1 and should be made within ONE MONTH of the date of Irish Water's decision.
3. A party to an Appeal shall give to An Bord Pleanála any documents, information or evidence in its possession or procurement which An Bord Pleanála consider necessary for the purpose of determining the Appeal.
4. Fees are payable on the making of Appeals, Submissions/Observations and Requests for Oral Hearings and details of such fees are available at [www.pleanala.ie](http://www.pleanala.ie)



**LICENCE NO.: IW-DTS-809938-01 CONDITIONS**

**1. Scope**

1.1. This licence is for the purpose of licensing trade effluent discharges to sewers as defined in the Local Government (Water Pollution) Act, 1977, as amended and nothing in this licence shall be construed as negating the Licensee's statutory obligations or requirements under any other enactments or regulations.

1.2. This licence remains valid for:

- I. as long as the licence has not been reviewed or revoked; or,
- II. a period of three years following the cessation of the discharge of trade effluent to sewer.

1.3. All trade effluent arising from the above mentioned premises shall be discharged to sewer in accordance with plans, drawings, maps and other documentation or further information submitted as part of the application for this licence/licence review.

1.4. Only trade effluent which is generated as a result of activities outlined in the application for this licence/ licence review at the above mentioned premises shall be permitted to discharge to sewer.

1.5. The Licensee shall give not less than 20 days notice in writing to Irish Water before making any material change which:

- I. may alter the nature or composition of the trade effluent discharged to sewer;
- II. may alter volume or rate of flow of the trade effluent discharged to sewer
- III. may alter abatement, treatment or recovery systems installed in connection with the trade effluent discharged to sewer; or,
- IV. may alter the range of processes or activities giving rise to the trade effluent;

unless the trade effluent to be discharged to sewer following such material change, complies fully with all conditions of this licence.

Any material change leading to a continuous non-compliance with any condition set out in this licence shall necessitate the Licensee to apply for a licence review.

1.6. Any change of;

- I. the above mentioned Licensee (i.e. the legal entity in control of the licence); and/or,
- II. location of the licensed activity from the above mentioned premises to an alternative location;

shall necessitate this licence to be revoked. The Licensee shall give not less than 20 days notice in writing to Irish Water of any such change.



**LICENCE NO.: IW-DTS-809938-01 CONDITIONS**

1.7. Any change of the business /trading name used by the above mentioned Licensee in carrying out the licensed activity shall necessitate the Licensee to apply for a licence review. The Licensee shall give not less than 20 days notice in writing to Irish Water of any proposed change to the business /trading name.

**2. Trade Effluent Discharged to Sewer**

2.1. The trade effluent arising from activities at the above mentioned premises shall be discharged to sewer as per the requirements of Schedule A of this licence.

2.2. The trade effluent shall be monitored at a frequency not less than that set out in Schedule B of this licence. The costs of all monitoring set out in Schedule B shall be borne by the Licensee.

2.3. The volume and rate of trade effluent discharged to sewer shall be calculated using inlet water meter readings (on the basis of the "water in/water out" principle), unless otherwise agreed in writing with Irish Water.

Authorised Persons of Irish Water shall have access to the inlet water meter at all reasonable times. Inlet water meter readings shall be retained by the Licensee and made available to Irish Water upon request.

2.4. The Licensee shall at no time discharge or permit the discharge into the sewer of any liquid matter or thing which;

- I. would constitute a danger to sewer maintenance personnel working in the wastewater network or wastewater treatment plant;
- II. cannot be appropriately treated at the downstream wastewater treatment plant;
- III. would be liable to render wastewater sludge generated at the downstream wastewater treatment plant unsuitable for disposal to agricultural lands or other approved disposal routes;
- IV. would be liable to cause corrosion to sewer pipes, penstock and sewer fittings or the general integrity of the sewer;
- V. would be liable to cause the liberation of by-products detrimental to either the wastewater network or wastewater treatment plant;
- VI. be liable to cause impairment of the receiving environment and ecosystem to which the wastewater treatment plant discharges;
- VII. would be liable to give rise to flammable or explosive vapours in the receiving wastewater network;
- VIII. would be liable to cause the release of nuisance odours from the wastewater network either directly or indirectly following mixing with other wastewater within the network; or,
- IX. would be liable to cause a blockage in the wastewater network or be liable to set, or congeal, at average sewer temperature.

2.5. Non-trade effluent wastewater (e.g. contaminated firewater, accidental spillages) which occurs on site shall not be discharged to the sewer without the prior written authorisation of

## LICENCE NO.: IW-DTS-809938-01 CONDITIONS

Irish Water.

2.6. The Licensee shall avoid the use of non-biodegradable cleaning agents/detergents. Where this is not possible, Best Available Techniques (BAT) shall be employed to substitute or minimise their discharge to sewer and receiving environment to which the wastewater treatment plant discharges.

### 3. Control and Monitoring

3.1. The Licensee shall clearly label and provide and maintain a suitable trade effluent sampling point(s) prior to any discharge to sewer and it/each shall be so constructed and maintained to enable safe and secure access and egress to authorised persons for the purpose of taking representative samples at any reasonable time of trade effluent discharged to sewer from the above mentioned premises.

3.2. The point(s) of discharge to sewer and trade effluent sampling point(s) shall be clearly indicated on appropriately scaled and clearly legible drawings/maps (≤A3) which shall be held onsite by the Licensee and submitted to Irish Water upon request.

3.3. The Licensee shall ensure that sampling and analysis for all parameters listed in the Schedules to this licence shall be undertaken by competent staff in accordance with documented operating procedures.

3.4. The Licensee shall ensure that sampling and analysis shall be carried out in accordance with CEN standards. If CEN standards are not available, ISO, national/international standards (or methods as agreed with Irish Water) that will ensure the provision of data of an equivalent scientific quality shall apply.

3.5. The Licensee shall provide and maintain safe and secure access and egress for authorised persons to inspect, examine, take readings from and test at any reasonable time any works and apparatus installed in connection with the control and management of trade effluent.

3.6. The Licensee shall provide and maintain if required by Irish Water additional apparatus for measuring and automatically recording the volume, rate of discharge and nature of the trade effluent to the satisfaction of Irish Water in connection with each pipe through which trade effluent is discharged to sewer. The cost of this work shall be borne by the Licensee.

3.7. The Licensee shall record all sampling, analyses, measurements, examinations, calibrations and maintenance carried out in accordance with the requirements of this licence.

3.8. All equipment used for monitoring discharges shall be calibrated in accordance with the manufacturers' recommendations and records of such calibrations shall be submitted to Irish Water upon request.

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3.9. The Licensee shall have a representative sample(s) of the trade effluent tested for any other parameters which may be reasonably required by Irish Water for the purposes of assessing the effects of the trade effluent on:

- I. the health and safety of wastewater network and treatment plant maintenance personnel;
- II. the general integrity of the wastewater network;
- III. the ultimate receiving environment and ecosystem;
- IV. the operations of the downstream wastewater treatment plant; and,
- V. the wastewater sludge generated at the downstream wastewater treatment plant.

**4. Notifications, Records and Reports**

4.1. The Licensee shall keep records in such a form as Irish Water may require of the volume, rate of discharge, nature and composition of the trade effluent discharged into the sewer.

4.2. The Licensee shall before the 31st of January each calendar year submit an annual report of all monitoring results via e-mail to both Licence Reporting Contacts set out on the final page of this licence. The report shall also contain a summary of the outcome of any non-compliance prevention actions employed by the Licensee during the previous year.

4.3. The Licensee shall maintain a register of chemicals and raw materials used in onsite processes. Relevant Safety Data Sheets (SDS's) shall also be retained onsite for inspection by Authorised Persons of Irish Water or submitted electronically to Irish Water upon request.

4.4. The Licensee shall immediately report any incident to Irish Water via the Incident Reporting Contact details on the final page of this licence.

An incident shall be considered to be any trade effluent discharge which:

- I. is a major breach of emission limits to sewer;
- II. would constitute a danger to sewer maintenance personnel working in the wastewater network or treatment plant;
- III. would be injurious to the construction of the wastewater network or treatment plant;
- IV. would be detrimental to the ultimate receiving environment or ecosystem;
- V. would interfere with the operations of the downstream wastewater treatment plant and supporting infrastructure; or,
- VI. would render wastewater sludge generated at the downstream wastewater treatment plant unsuitable for disposal to agricultural lands or other approved disposal routes.

**LICENCE NO.: IW-DTS-809938-01 CONDITIONS**

**5. Infrastructure, Maintenance and Operation**

5.1. Where separate stormwater drainage is present, the Licensee shall maintain onsite pipelines carrying trade effluent so as to exclude the ingress of surface or storm water and shall ensure that they are fit for purpose through routine inspection.

5.2. All process chemicals, fuels and other liquids with the potential to cause an incident as detailed above should they be released in an uncontrolled manner shall be stored in bunded areas so as to prevent their discharge to the sewer.

5.3. The Licensee shall install and maintain any settlement tanks, oil separators, interceptors, meters, gauges, manholes, inspection chambers, sampling chambers, grease removal equipment, bunded storage areas and other associated infrastructure so as to meet the required Emission Limit Values (ELV's) and in any case, at least in accordance with the manufacturers' recommendations, industry best practice guidelines or as per additional maintenance or servicing requirements set out by Irish Water based on operational experience.

5.4. The Licensee shall operate and maintain monitoring and analyses equipment as necessary so that monitoring accurately reflects the trade effluent discharged to sewer.

5.5. If required by Irish water, the trade effluent generated onsite shall pass through appropriately sized screening before discharge to sewer so as to remove gross solids, lint, hair and fibres and prevent their entry to the sewer. The screening apparatus shall be located upstream of the final trade effluent sampling point.

**6. Financial Charges and Provisions**

6.1. The Licensee shall pay amounts as may be determined by Irish Water having regard to the expenditure incurred or to be incurred by it in monitoring, treating and disposing of discharges of trade effluent, sewage effluent or other matter to sewer.

6.2. The Licensee shall pay amounts as may be determined by Irish Water having regard for any compliance monitoring conducted by Irish Water in addition to self monitoring set out in Condition 2.2 of this licence. This charge covers the cost of sample collection and analysis. Payment is to be made on demand. The frequency of such additional monitoring will depend on compliance with Condition 2.1 of this licence.

(see Schedule A and Schedule B overleaf)



LICENCE NO.: IW-DTS-809938-01 CONDITIONS

Schedule A

Discharge Point Reference No.	TE 1	
Parameter	Emission Limit Values*	
Flow**	5 m3/day	
Flow**	0.5 m3/hr	
pH	6.0 – 10.0 pH Units	
Temperature	35 Celsius	
Toxicity (Toxicity Units***)	10 TU	
	Concentration (mg/l)	Load (kg/day)
BOD	1,000	5
COD	3,000	15
Total Suspended Solids	1,000	5
Fats, Oils and Grease (FOG)	100	0.5
Total Phosphorus (as P)	15	0.075
Total Ammonia (as N)	20	0.1
Chloride	1000	5
Sulphate	800	4
Detergents (MBAS)	100	0.5

\* Note: If requested by Irish Water, samples shall be taken on a 24 hour flow proportionate composite sampling basis, otherwise a grab/spot sample will suffice. A composite sample for testing purposes shall be defined as any sample extracted from the sampling apparatus between 8.00 am and 12.00 noon on any day for which normal operational activities have been ongoing for the previous 24 hours.

\*\* Note: Flow shall be calculated in accordance with Condition 2.3.

\*\*\* Note: Toxicity Units (TU) are defined as:  $TU = (100/x \text{ Hour EC50})$  where x is the relevant period of exposure and EC50 is expressed as % vol/vol.



LICENCE NO.: IW-DTS-809938-01 CONDITIONS

Schedule B

Discharge Point Reference No.	TE 1	
Parameter	Monitoring Frequency*	Methodology
Flow	Continuous	As per Condition 2.3
pH	Daily	As per Conditions 3.3 & 3.4
Temperature	Daily	As per Conditions 3.3 & 3.4
BOD	Quarterly	As per Conditions 3.3 & 3.4
COD	Quarterly	As per Conditions 3.3 & 3.4
Total Suspended Solids	Quarterly	As per Conditions 3.3 & 3.4
Fats, Oils and Grease (FOG)	Quarterly	As per Conditions 3.3 & 3.4
Total Phosphorus (as P)	Quarterly	As per Conditions 3.3 & 3.4
Total Ammonia (as N)	Quarterly	As per Conditions 3.3 & 3.4
Chloride	Quarterly	As per Conditions 3.3 & 3.4
Sulphate	Quarterly	As per Conditions 3.3 & 3.4
Detergents (MBAS)	Quarterly	As per Conditions 3.3 & 3.4
Toxicity	As Requested	As per Conditions 3.3 & 3.4
Respirometry	As Requested	As per Conditions 3.3 & 3.4

\* Note: Sampling shall take place on alternate week days on a rolling basis to ensure representative samples are obtained for site operations which may vary across the working week.

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LICENCE NO.: IW-DTS-809938-01 CONDITIONS

<p><b>Licence Reporting Contact details:</b></p> <p>Email: <a href="mailto:TER@water.ie">TER@water.ie</a> Telephone: 1850 278 278 Irish Water PO Box 860 South City Delivery Office Cork City</p>	<p><b>Licence Reporting Contact details:</b></p> <p>Jonathan Sexton, Executive Scientist, Water &amp; Environment, Wicklow County Council, Station Road, Wicklow Town Tel: 0404-20100 E-mail: <a href="mailto:jsexton@wicklowcoco.ie">jsexton@wicklowcoco.ie</a></p> <p>(Acting for and on behalf of Irish Water)</p>
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<p><b>Incident Reporting Contact details:</b></p> <p>Telephone: 1850 278 278 Irish Water PO Box 860 South City Delivery Office Cork City</p>
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APPENDIX D  
APPROPRIATE ASSESSMENT SCREENING  
REPORT

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# Screening Report for Appropriate Assessment for a Waste Licence Application Bray Co. Wicklow

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July 2019

Verde Environmental Consultants Ltd.



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Verde Environmental Group is accredited to ISO 9001, ISO 14001, BS OHSAS 18001



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## 1.0 INTRODUCTION

Verde Environmental Consultants, (VEC) was commissioned by Packaging Laundry Ltd to undertake a Stage 1 Habitats Directive Assessment: Screening for Appropriate Assessment for a waste licence application for their existing facility located at Oldcourt Industrial Estate at Boghall Road, Bray, Co. Wicklow (see Figure 1.1 for site location).

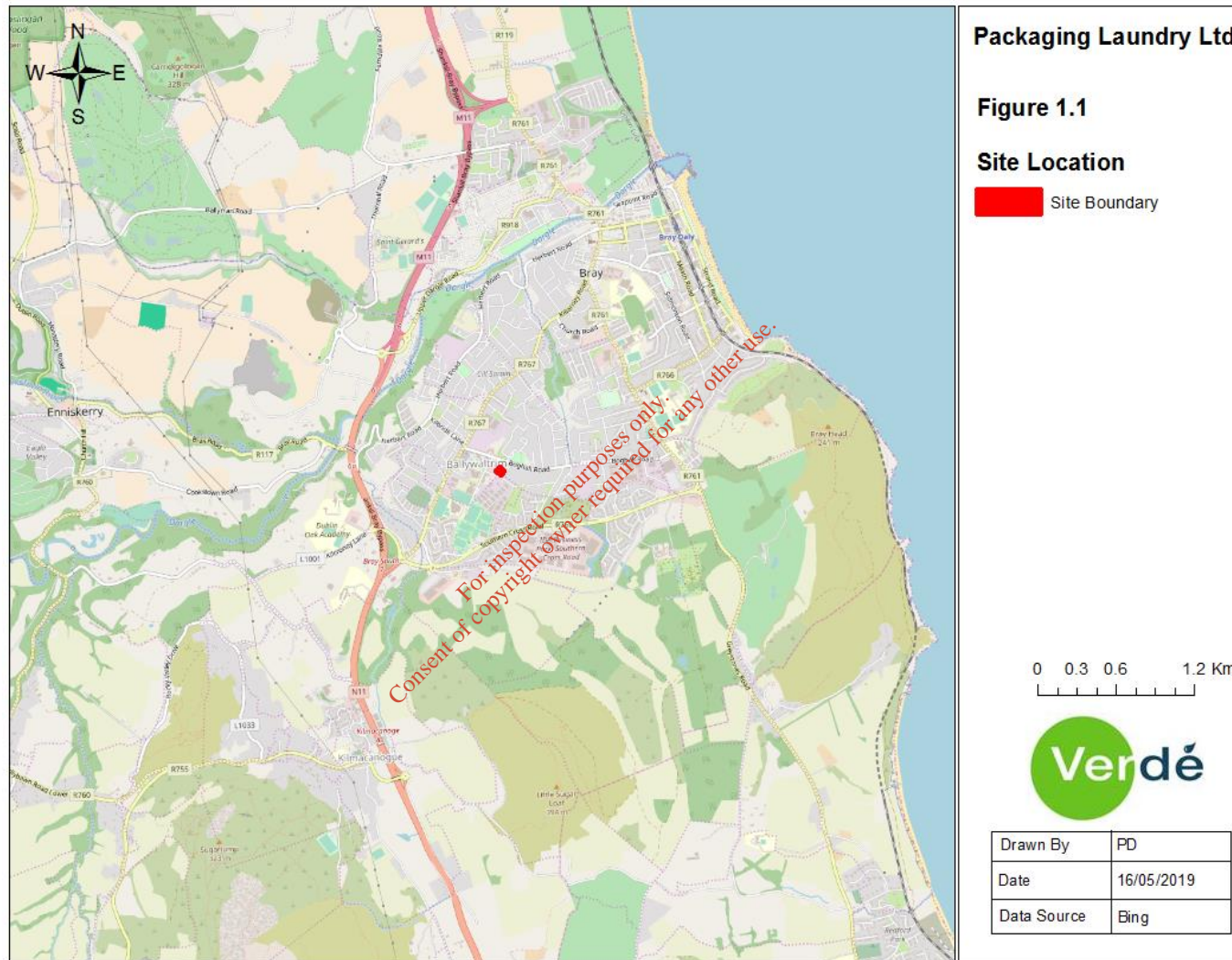
This Screening Report for Appropriate Assessment is being undertaken in order to comply with the requirements of Article 6(3) of the Habitats Directive and Article 42 of the European Communities (Birds and Natural Habitats) Regulations. Section 42(1) of these Regulations requires a Public Authority to carry out a screening for appropriate assessment of a project for which an application for consent is received. The screening for Appropriate Assessment is required to assess the project individually or in combination with another plan or project for its potential to result in a likely significant effect on a European Site(s), in view of best scientific knowledge and in view of the conservation objectives of relevant European Site(s).

The function of this Screening Exercise is to identify the potential for the project to result in likely significant effects to the Conservation Objectives of European Sites and to provide information so that the competent authority can determine whether an Appropriate Assessment is required for the project.

### 1.1 Stage 1 Screening Method

The function of the Screening Assessment is to identify whether or not the proposal will have a likely significant effect on European Sites. In this context “likely” refers to the presence of doubt with regard to the absence of significant effects (ECJ case C-127/02) and “significant” means not trivial or inconsequential but an effect that has the potential to undermine the site’s conservation objectives (English Nature, 1999; ECJ case C-127/02). In other words any effect that compromises the functioning and viability of a site and interferes with achieving the conservation objectives for the site would constitute a significant effect.

The nature of the likely interactions between the proposed development and the integrity of a European Site will depend upon whether or not European Sites occur within the zone of influence of the project. The potential for likely significant effects to European Sites that do occur within the zone of influence of the project will depend upon the project’s potential to result in ecological effects and the sensitivity of European Site qualifying features to such effects.





This Screening for Appropriate Assessment has been undertaken with reference to respective National and European guidance documents: Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (DEHLG 2010) and Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC and relevant European and National case law. The following guidance documents were also of relevance during this Screening Assessment:

- A guide for competent authorities. Environment and Heritage Service, Sept 2002. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2010), DEHLG
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats Directive 92/42/EED. European Commission (2001)
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats directive 92/43/EEC. European commission (2000). (To be referred to as MN 2000)

The EC (2001) guidelines outline the stages involved in undertaking a Screening exercise of a project that has the potential to have likely significant effects on European Sites. The methodology adopted for this Screening exercise is informed by these guidelines and was undertaken in the following stages:

1. Describe the project and determine whether it is necessary for the conservation management of European Sites
2. Identify European Sites that could be influenced by the project
3. Where European Sites are identified as occurring within the zone of influence of the project identify potential effects arising from the project and screen the potential for such effects to negatively affect European Sites identified under Point 2 above; and
4. Identify other plans or projects that, in combination with the project, have the potential to affect European Sites.



## 2.0 PROJECT DESCRIPTION

The project involves an application for a Waste Licence to the Environmental Protection Agency (Agency). Packaging Laundry Ltd currently operates under a waste facility permit that was issued by Wicklow County Council in May 2018 (Permit Ref. No. WFP-WW-18-0043-01). The permit was granted listing principal activity at the facility as Class 10 (Recovery of non-hazardous waste < 50,000 tonnes per annum and with <15% residual to onward Disposal). Acceptable List of Waste Codes are LoW 15 01 02 and 15 01 04. At present, the facility accepts less than 1,000 tonnes of material per annum of which 98% is reconditioned for re-use and 2% is transferred onwards for recycling/further recovery. The Licence will allow the facility to accept up to a maximum of 1,650 tonnes of packaging per annum.

The following is a brief overview of the operations that currently occur at the Packaging Laundry site.

- IBC Reconditioning Closed Loop - Packaging Laundry Ltd. provides a Reconditioning Service for customers IBC's and return to the customer for re-use again for the same purpose
- IBC Reconditioning Open Loop – This occurs where empty IBCs are collected from customers who have no further use for the packaging. Following reconditioning, these IBC's are sold to third party customers for re-use as alternatives to having to purchase new IBC's.
- Steel Barrel Reconditioning Open Loop
- IBC Dismantling and Rebottling – Damaged bottles (e.g. that fail leak tests/end of life bottles) are removed, washed, dried and cut into manageable pieces before transfer to authorised recyclers. New bottles are then placed into the Reconditioned IBC steel cages and supplied as a Re-Bottled IBC to 3rd party customers
- Steel Drum Dismantling – Steel drums that are damaged beyond safe repair are washed and crushed before transfer to authorised metal recovery facility

Emissions from the project site relate to surface water emissions from a wash down area on site and emissions to atmosphere from an air conditioning unit. All containers external surfaces are cleaned and labelling removed. Containers are then cleaned internally in a three-stage high pressure/low volume water system. A specialist 360° hose is mechanically lowered inside the IBC which cleans the interior of the container using high pressure water spray at 400 Bar pressure. The containers undergo a three stage washing process before the cleaning water is removed from the container. All washings from the washing process are drained and stored in an on-site 5,000 litre water storage tank. The site is subject to an Irish Water trade effluent discharge permit (ID: IW-DTS-809938-01) to the local foul sewage network. This Licence was issued in December 2017.



Packaging Laundry Limited has consulted with the County Council and the Agency (under Article 11) to be allowed to accept packaging material (IBCs for reconditioning) that formerly contained hazardous material. The Agency has confirmed that the acceptance of non-hazardous waste IBCs and steel drums for reconditioning as described above and to prepare material for reuse through dismantling, replacement of IBC bottles, washing and crushing etc. can be accommodated under a waste facility permit. The Agency has further confirmed that acceptance, waste recovery and storage of used packaging that contained hazardous substances is more appropriately authorised under conditions of a waste licence. This material is described under List of Waste Code 15 01 10\* (Packaging containing residues of or contaminated by hazardous substances).

Packaging Laundry intends to apply to the Agency so that List of Waste Code 15 01 10\* can be accepted at the facility. The containers accepted onto the site will empty (as is currently the case with all IBCs and steel drum containers accepted onto the site). Strict waste acceptance criteria are in place to ensure that all container packaging is empty as empty as practically possible. Of the packaging material received on site, approximately 98% is refurbished/reconditioned for re-use by either the owner of the container or a third-party customer. The remaining 2% is prepared on site (washed, cut, crushed etc) prior to collection for delivery to an authorised plastic or metal recycler/waste recovery facility.

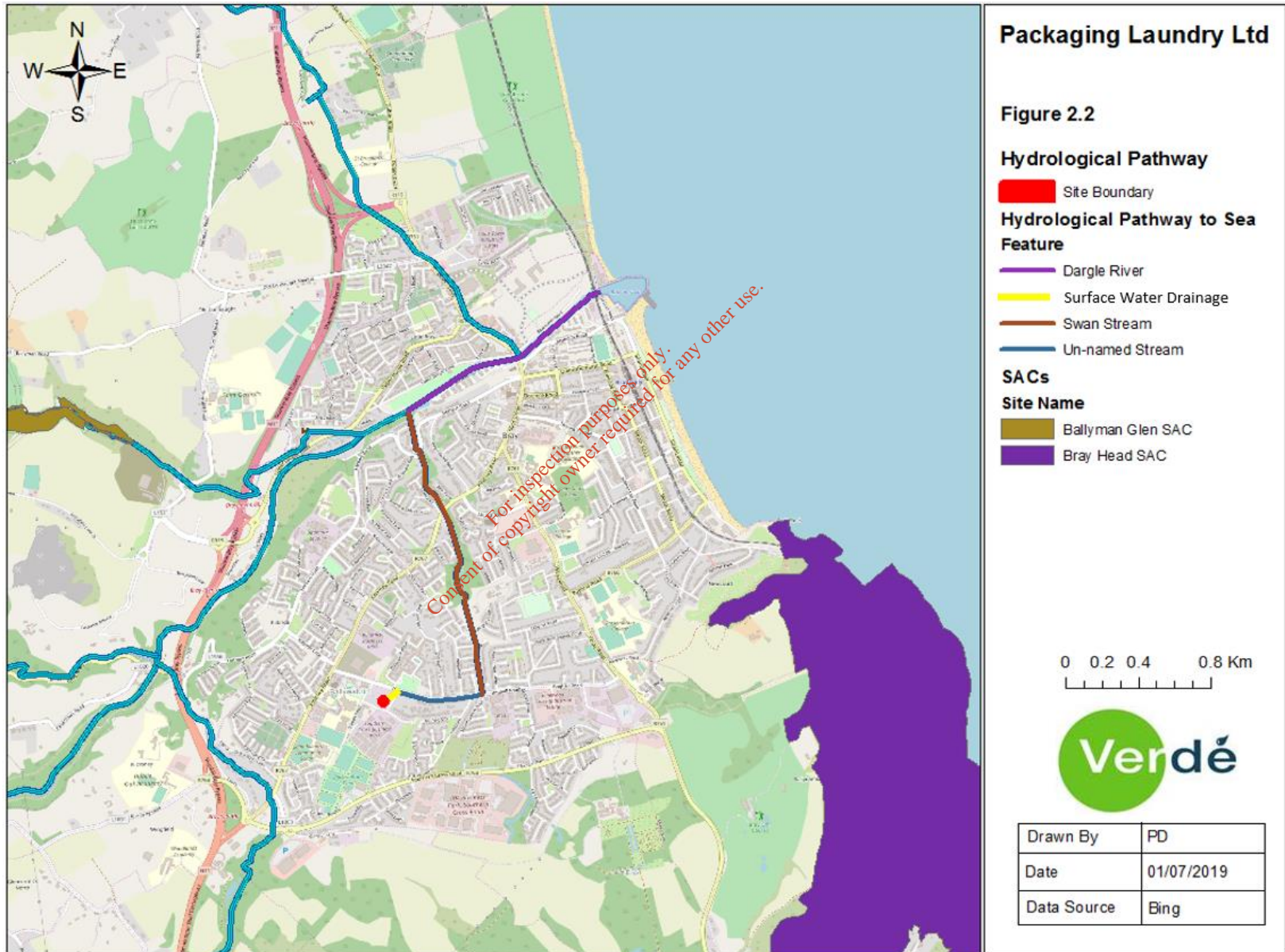
## 2.1 PROJECT SITE DESCRIPTION

The project site is located within an industrial estate just off the Boghall Road in Bray Co. Wicklow. It is situated within the urban environment of Bray town and is surrounded by artificial surfaces and built land. There are no natural habitats occurring in the immediate vicinity of the project site. An aerial view of the project site and surrounds is provided as Figure 2.1 below.

The project site is located within the Dargle River catchment. Surface water drains connect the project site to an un-named and un-mapped stream that flows east along the Boghall Road to the north of the project site. This stream discharges to the Swan Stream which is a tributary of the Dargle River. The Dargle River discharges to the sea at Bray. No European Sites occur within the vicinity of the Dargle River discharge point. This hydrological pathway is shown on Figure 2.2. It is noted that only clean surface water runoff discharging from roofs and outdoor yard areas drain to this hydrological pathway. No process or washdown water generated at the project site drains to this surface water hydrological pathway. As described in Section 2.0 above all process and washdown waters discharge to the foul sewerage network. The nearest European Site to the surface water hydrological pathway discharge point is Bray Head SAC which is designated for terrestrial habitats, not influenced by marine or surface water bodies.











## 4.0 THE PROJECT & EUROPEAN SITE BASELINE

### 4.1 Identification of European Sites within the Zone of Influence of the Project

Current guidance on undertaking EU Habitats Directive Article 6 Assessments advises that all European Sites occurring within a 15km radius of a project site should be included within a Screening Assessment (Scott Wilson et al., 2006; DOEHLG, 2010). Thirteen European Sites, comprising of nine SACs and four SPAs occur within the surrounding 15km radius of the site (see Figure 4.1 and Figure 4.2 and Table 4.1 for list of European Sites). The qualifying features of interest for which each of these European Sites has been designated is provided in Appendix 1.

As the project does not occur within or adjoin a European Site, the project will not have the potential to result in direct impacts to European Sites. Thus this Screening exercise focuses on investigating whether the project will have the potential to result in indirect effects to European Sites or effect mobile species associated with European Sites beyond the boundaries of their designated conservation areas.

A source-pathway-receptor model has been used to establish which European Sites could occur within the zone of influence of potential indirect impacts. Under such a model, the project, as described in Section 2 of this Screening Report, represents the source.

Potential impact pathways are restricted to hydrological pathways and the potential for interaction with qualifying habitats and mobile species listed as qualifying features of interest/special conservation interests for European Sites. Noise, aerial and visual emissions will not represent potential impacts to surrounding European Sites due to the distance between the project site and the nearest European Sites and the imperceptible noise and air emissions that are generated from the project site during operations. It is noted that air emissions are generated at the project site via an air conditioning unit. This unit does not emit pollutants to atmosphere and does not have the potential to result in any changes to air quality in the vicinity of the emissions point or in the wider surrounding area.

The receptors represent European Sites and their associated qualifying features of interest.

European Sites and their associated qualifying features are likely to occur in the zone of influence of the project only where potential emissions from the project site, in the form of hydrological or mobile species pathways establish a link between the project and the European Site. Table 4.1 provides a determination as to whether

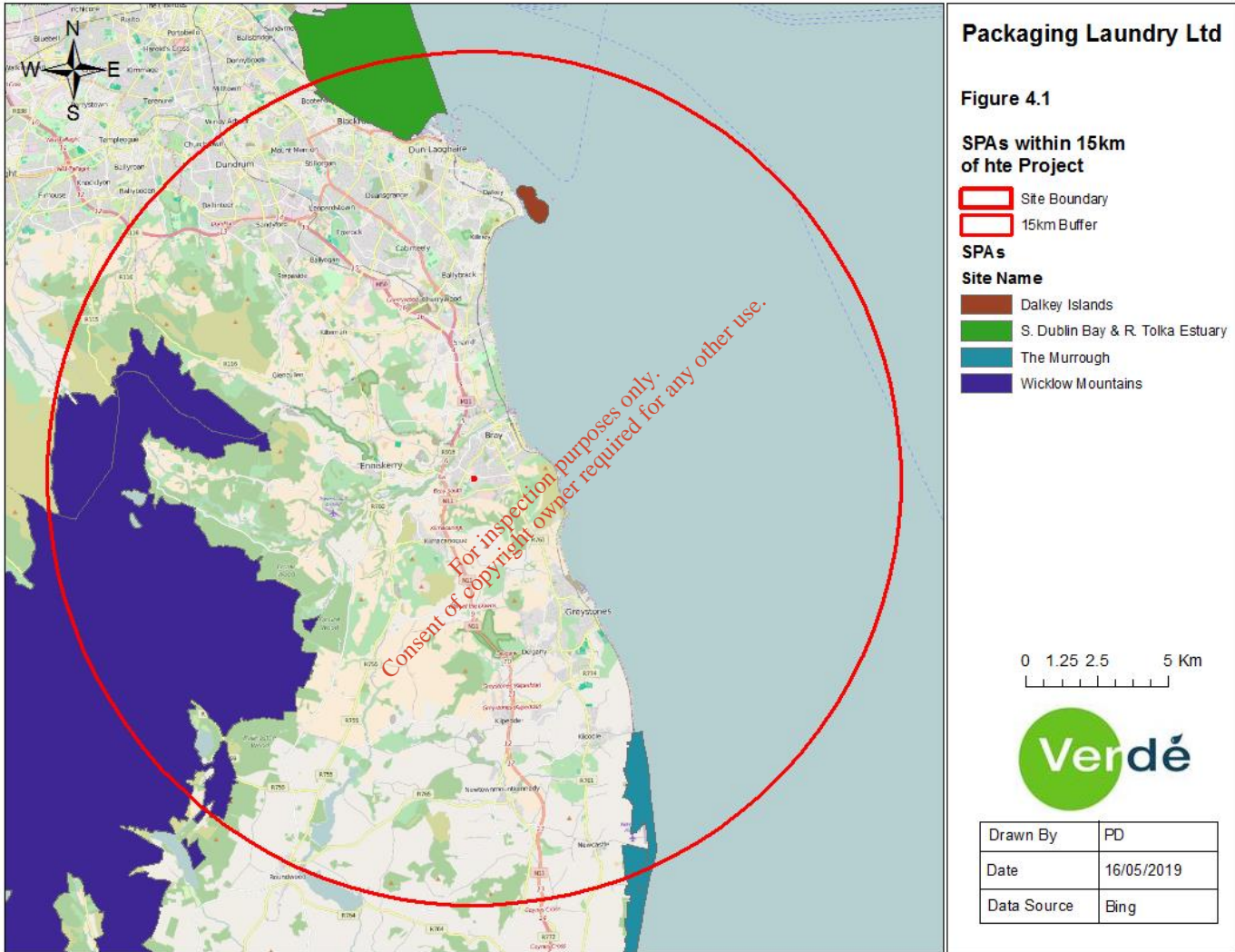


each European Site occurs within the zone of influence of the project. This determination has been undertaken in line with the following assessment questions:

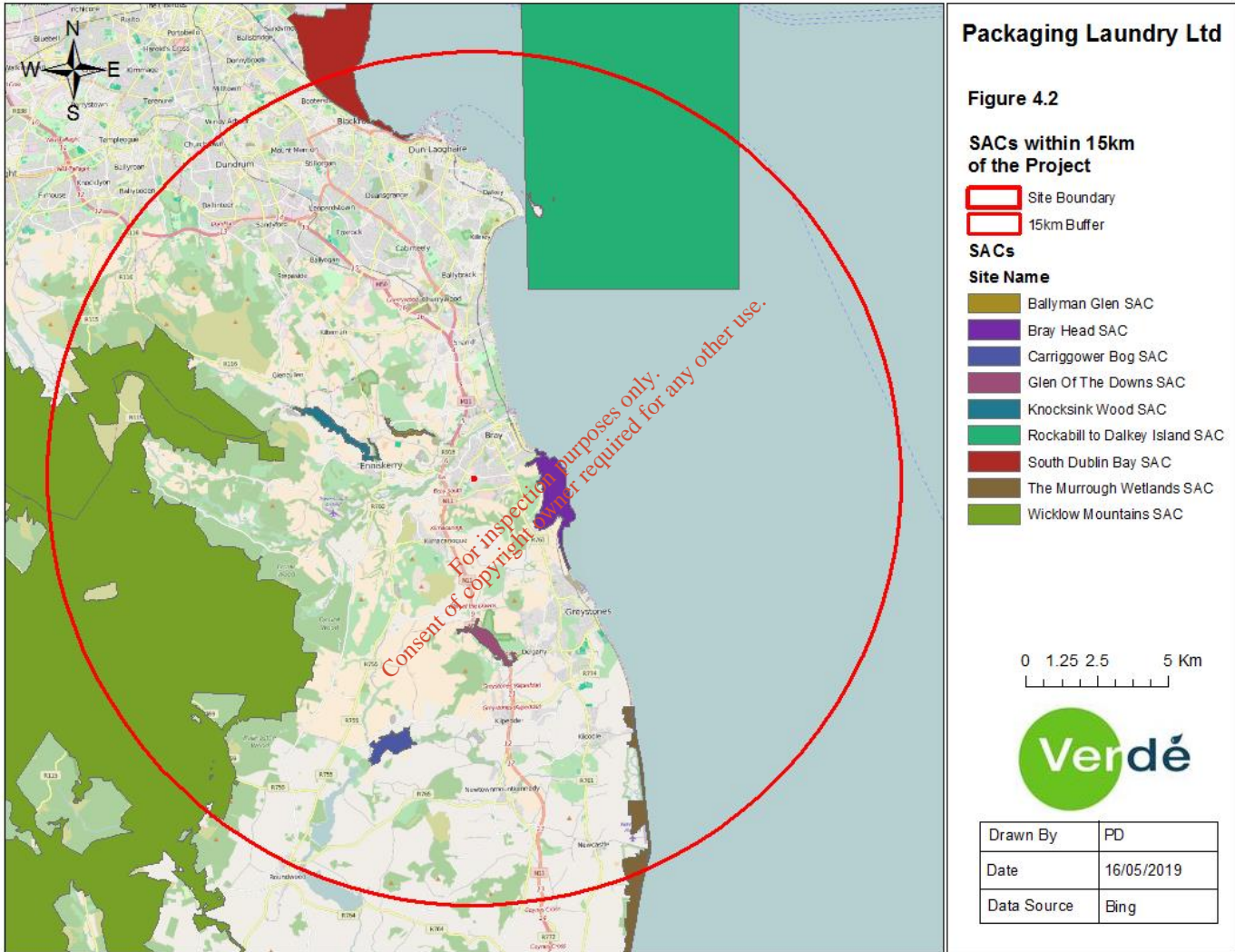
- Is there an impact pathway link between the Project site and European Sites?
- Are qualifying habitats of these European Sites at risk of experiencing impacts as a result of the project?
- Does the project site have the potential to interact with Annex II qualifying species/ special conservation interest species of these European Sites?

The evaluation of these assessment questions has been undertaken in view of the qualifying features of interest (see Appendix 1) of each of the European Sites listed in Table 4.1.

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**Table 4.1: Identification of European Sites within the Zone Of Influence of the Project**

European Sites	Site Code	Distance from Project Site	Hydrological pathway	Risks to Qualifying Habitats	Mobile Species	Does the European Sites occur within the zone of influence of the project?
Bray Head SAC	714	1.8	<p>No. There is no hydrological pathway linking the project site to this SAC. All process and washdown waters generated at the project site are discharged to the foul sewerage network and are conveyed to the Bray Wastewater Pumping Station from where it is pumped to Shanganagh Treatment Works (near Shankill). All wastewater is fully treated at the treatment works prior to discharge to Irish Sea off Killiney.</p> <p>Only clean surface water runoff is generated at the project site and this discharges via the hydrological pathway shown in Figure 2.2 to the sea</p>	<p>No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form the project that could interact with or affect these habitats.</p>	<p>No. No Annex II species are listed as qualifying features of interest for this SAC.</p>	<p>No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.</p>

			at Bray. The discharge point of the surface water hydrological pathway is located at a remote distance from this SAC and is not connected to it.			
South Dublin Bay SAC	210	12.2km	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions from the project that could interact with or affect these habitats.	No. No Annex II species are listed as qualifying features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.



Ballyman Glen SAC	713	2	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form the project that could interact with or affect these habitats.	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.
Carriggower Bog SAC	716	9	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or



				the project that could interact with or affect these habitats.		effect this SAC. This SAC lies outside the zone of influence of the project.
Glen of The Downs SAC	719	5	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form the project that could interact with or affect these habitats.	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.
Knocksink Wood SAC	725	3.3	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway.	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site





				There are no hydrological pathway and no emissions form the project that could interact with or affect these habitts.		and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.
Wicklow Mountains SAC	2122	6.7	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form the project that could interact with or affect these habitts.	No. Otters are the only mobile species listed as qualifying species for this SAC. There is no habitat occurring in the vicinity ofh te project site that could support otters and this project site is located at a significant distance from this SAC and the lotic habitats upon which otters rely.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.



The Murrough Wetlands SAC	2249	9.5	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form the project that could interact with or affect these habitts.	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or effect this SAC. This SAC lies outside the zone of influence of the project.
Rockabill to Dalkey Island SAC	3000	6.8	No. There is no hydrological pathway linking the project site to this SAC.	No. The qualifying habitats of this SAC are terrestrial in nature and are not influenced by hydrological pathway. There are no hydrological pathway and no emissions form	No. No mobile species are designated as features of interest for this SAC.	No. Due to the absence of any emissions and hydrological pathway that could connect the project to this SAC and the distance between the project site and this SAC there will be no potential for the project site to interact with or

				the project that could interact with or affect these habitats.		effect this SAC. This SAC lies outside the zone of influence of the project.
South Dublin Bay and River Tolka Estuary SPA	4024	9.5	No. There is no hydrological pathway linking the project site to this SPA.	No. there are no connections between the project site and the wetland habitats of this SPA.	No. No suitable habitat for the special conservation interest bird species of this SPA occur at or in the vicinity of the project site.	No. There are no connections between the project site and this SPA and there is no potential for the project to interact with this SPA. This SPA lies outside the zone of influence of the project.
Wicklow Mountains SPA	4040	7	No. There is no hydrological pathway linking the project site to this SPA.	No. there are no connections between the project site and the wetland habitats of this SPA.	No. No suitable habitat for the special conservation interest bird species of this SPA occur at or in the vicinity of the project site.	No. There are no connections between the project site and this SPA and there is no potential for the project to interact with this SPA. This SPA lies outside the zone of influence of the project.



Dalkey Islands SPA	4172	12	No. There is no hydrological pathway linking the project site to this SPA.	No. there are no connections between the project site and the wetland habitats of this SPA.	No. No suitable habitat for the special conservation interest bird species of this SPA occur at or in the vicinity of the project site.	No. There are no connections between the project site and this SPA and there is no potential for the project to interact with this SPA. This SPA lies outside the zone of influence of the project.
The Murrough SPA	4186	10.5	No. There is no hydrological pathway linking the project site to this SPA.	No. there are no connections between the project site and the wetland habitats of this SPA.	No. No suitable habitat for the special conservation interest bird species of this SPA occur at or in the vicinity of the project site.	No. There are no connections between the project site and this SPA and there is no potential for the project to interact with this SPA. This SPA lies outside the zone of influence of the project.

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Table 4.1 above shows that none of the thirteen European Sites occurring within a 15km radius of the project site occur within the zone of influence of the project

Table 4.2 provides a Screening Assessment in line with EU Guidance (2001) Assessment Criteria used to examine the potential of the proposed development to adversely impact upon European Sites. These assessment criteria are used to establish whether the project will have the potential to result in likely significant effects to the European Sites occurring in the wider area surrounding the project site.

Assessment Criteria	
<b>Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) to European Sites by virtue of:</b>	
Size and Scale	The project is small in size and scale and relates to ongoing operations at the Packaging Laundry Ltd. facility in Bray. The Licence will allow acceptance of up to 1,650 tonnes of empty packaging containers per annum.
Land-take	The project will not involve in any land take from European Sites or from semi-natural habitats.
Distance from European sites or key features of the site	The project is located at a remote distance from European Sites. The nearest European Sites is Bray Head SAC, located approximately 1.8km to the east. This SAC is designated for its cliff and heath habitats both of which are located over 1.8km from the project site.
Resource requirements	The project will not require the use of any resources that are connected with European Sites.
Emissions	The project operations generate emissions to the municipal foul water network and air. As outlined in Section 2.0 above, process water from washing of containers is discharged under controlled conditions from a 5000L holding tank to the municipal sewer. This discharge is licensed by Irish Water. Ultimately, foul water from Bray and surrounding area enters Bray Pumping Station from where it is pumped to Shanganagh Wastewater Treatment Works for treatment. There is no potential water emissions from the project site to interact with and influence the conservation status European Sites.





	Air emissions generated at the project site relate to emissions from an air conditioning unit. These emissions do not emit pollutants to the atmosphere and does not have the potential to negatively affect air quality locally or further afield in the vicinity of any European Sites.
Excavation requirements	No excavations are required as part of the project.
Transportation requirements	The project will not result in any changes to baseline traffic and transportation requirements.
Duration of construction, operation etc.	No construction activity is associated with the project. The licence that is being applied for is not time limited.
In-Combination Effects	As the project is not connected via any pathways to European Sites and as it is not resulting in any emissions to the local environment that could be perturbing air or water quality it will not have the potential to combine with other plans or project in the surrounding area to result in additive and cumulative effects to the environment and/or European Sites.
Reduction of habitat area	The project will not result in a reduction in the area of any qualifying habitats for European Sites.
Disturbance of key species	The project site is located in an urban area and will not result in any interaction with qualifying species/special conservation interest bird species of surrounding European Sites.
Habitat or species fragmentation	The project will not result in any fragmentation of natural, semi-natural habitats in the surrounding area or qualifying habitats of European Sites.
Reduction in species density	The project will not pose a risk of negative effects to the environment and will not have the potential to result in a reduction in the density of qualifying species or special conservation interest bird species of European Sites in the wider surrounding area.
Changes in key indicators of conservation status	The Site Specific Conservation Objectives of European Sites represent the key indicators of conservation status for the habitats and species that are supported under these sites. The project is not connected via impact pathways to any European Sites and will not have the potential to undermine the conservation objectives of these sites.
<b>Describe any likely impacts on the European Site as a whole in terms of:</b>	



<p>Interference with key relationships that define the structure and function of the site</p>	<p>The key relationships that define the structure and function of European Sites are detailed in the Site Specific Conservation Objectives for European Sites. As the project is not connected via any impact pathway to European Sites it will not have the potential to interfere with the Site Specific Conservation Objectives of European Sites and these key relationships.</p>
<p><b>Describe from the above the elements of the project or plan or combination of elements, where the above impacts are likely to be significant or where the scale of magnitude of impacts is not known.</b></p>	
<p>It has been concluded that the project will not have the potential to interact with any European Sites occurring in the wider area surrounding the project site due to the absence of any polluting emissions from the project site or emission pathways that could connect the project site to European Sites occurring in the wider surrounding area.</p>	

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## 6.0 SCREENING STATEMENT CONCLUSION: FINDING OF NO SIGNIFICANT EFFECTS

During the Screening of the proposed project it was found that 13 European Sites occur within a 15km radius of the project site. None of these European Sites are adjudged to be located within the zone of influence of the project.

In light of the findings of this report, it is the considered view of the author of this Screening Report for Appropriate Assessment that it can be concluded by the Agency that the project is not likely, alone or in combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific practice and there is no reasonable scientific doubt as to that conclusion.

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## REFERENCES

- Department of the Environment Heritage and Local Government (DEHLG) (2008) Circular letter SEA 1/08 & NPWS 1/08.
- Department of the Environment Heritage and Local Government (DEHLG) (2010). Appropriate Assessment of Plans and Projects. Guidance for Local Authorities.
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