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Ms Siobhan Egan,
Inspector
Environmental Licensing Programme
Environmental Protection Agency
Headquarters PO Box 3000
Johnstown Castle Estate
County Wexford

29th June 2020

Re: Application for Licence Reg No: W0185-02

Dear Ms Egan,

I refer the Agency's letter dated 28th May 2020 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The EPA's requests are set out in italics followed by Rilta's response.

1. Details of emission point Ref Tf Al.

In correspondence dated 26/09/2018 (received by the Agency on 27/09/2018) it states that the air emission point reference Tf Al is still in place at the installation and may be required in the future.

Please provide details of the emission point including the following, where applicable: source of the emission, the location, the grid reference (12 digit ING, 6E, 6N), vent details (diameter and height above ground (m)), volume to be emitted (average and maximum per day Nm^3/day, maximum rate per hour Nm^3/hr, minimum efflux velocity $m.sec^{-1}$), average periods of emission (min/hr, hr/day and day/hr) chemical characteristics of the emission (prior to treatment and as discharged), the potential impact of the air emission Tf Al on air quality and any other factors relevant to that emission.

Rilta has decided that emission point TFA1 is no longer required for either current or future activities and does not seek to retain it in the revised licence.

2. *In correspondence dated 26/09/2018 (received by the Agency on 27/09/2018) details of proposed wastes for authorization are provided, however it is not confirmed if all wastes currently authorized under W0185-01 are also proposed for waste acceptance as part of the application. If so please provide a description of all proposed waste activities by completing the following table (the first row is completed as an example and should be deleted to make way for real information):*

Waste intake Type by LoW code	Waste treatment process	IE Class of Activity. 11.1, 11.2(b), 11.2(c), 11.2(d), 11.2(f), 11.4(a)(ii), 11.6	Quantity proposed for acceptance (tonnes/ annum (t/a))	Maximum capacity of the treatment process (t/a)	Output from the treatment process	Dispatch destination of the waste output	End destination, including whether recovery or disposal
WEEE (16 02 11)*	*Dismantling*	*11.1*	*380 t/a*	*20 tonnes/day (t/d) 6,080 t/a*	*e.g. Ferrous Metal*	*Name of facility at destination*	*Name of end destination e.g. Recovery*

In addition to the new waste types listed in the application it is intended to retain approval for all of the waste types currently authorised for acceptance as listed in the original licence application (Attachment 1). Details of the dispatch destinations and the end destinations will be provided to the Agency in the Annual Environmental Report.

3. Please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

Updated non-technical summaries of the application and the EIAR are in Attachments 2 and 3 respectively.

4. In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

The submitted drawings do not have to be revised.

Yours Sincerely

Jim O'Callaghan

ATTACHMENT 1

TABLE E.2.2 HAZARDOUS WASTE TYPES AND QUANTITIES

HAZARDOUS WASTE	DETAILED DESCRIPTION	Tonnes Per Annum
Waste Oil	Industrial sources	10,000
Oil filters	Industrial sources	1,000
Asbestos	Industrial sources	1,000
Oil/Sand Mixtures or Mixtures of Oil and Other Material	Industrial sources	10,000
Wood Preservation Waste	Industrial sources	100
Wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal	Industrial sources	300
Wastes from Inorganic Chemical Processes	Industrial sources	9,000
Wastes from Organic Chemical Processes	Industrial sources	600
Agrochemical Wastes	Industrial sources	100
Infectious Healthcare Waste		
Photographic Processing Waste	Industrial sources	1,000
Paint, inks, adhesives and resins	Industrial sources	1,000
Batteries and accumulators	Industrial sources	600
Florescent tubes and other mercury containing waste	Industrial sources	300
OTHER HAZARDOUS WASTE (APPLICANT TO SPECIFY)		
Contaminated Soil etc.	Industrial sources	1,000
Oil sludges/interceptor waste	Industrial sources	10,000
Waste electrical & electronic equipment	White goods/IT equipment etc.	3,000
Small arisings	Industrial sources	1,000
Packaging Waste	Steel/Plastic	7,500

ATTACHMENT 2

1.0 Introduction

RILTA Environmental Limited (RILTA) is applying to the Environmental Protection Agency (EPA) for a review of its Industrial Emissions Licence (Register Number: W0185-01) for its existing Hazardous Waste Transfer Station at Site No 14 A1, Greenogue Business Park, Rathcoole, County Dublin. In addition to the waste types already authorised, it is proposed to accept flue gas treatment residues, including, fly ash and boiler ash, referred to as air pollution control residue (APCR) in this application and transfer the material abroad for disposal/recovery. The material is classified as hazardous.

2.0 Planning Permission

Planning permission (Ref SD02A/0301) was granted for the development of the facility as a waste transfer station for the handling of hazardous and non-hazardous wastes in November 2002. South Dublin County Council has confirmed that the proposed changes do not require planning permission.

The current operations and the proposed activities do not come under the EC (Control of Major Accident Hazards involving Dangerous Substances) Regulations, 2006.

3.0 Existing Site

The existing site encompasses 0.5ha and there are three adjoining buildings-Warehouse, Chemical Store and the Offices. There is a weighbridge at the site entrance and a covered Tanker Bay. There is a redundant backup generator in a bund in the north-eastern corner of the site. The open yards (2,760m^2) are paved with a 120mm reinforced concrete slab.

4.0 Current Operations

The installation is authorised to accept up to 60,000 tonnes of waste comprising 27,000 tonnes of non-hazardous household, commercial and industrial, construction and demolition wastes, sewage and industrial sludges, and 33,000 tonnes of hazardous waste, including asbestos.

On-going activities include the acceptance and processing of electrical transformers inside the warehouse, the storage and onward transfer of batteries and the short term storage of refrigerators.

The transformers are stored in the Warehouse pending the removal of the coolant oil, which is the stored in Intermediate Bulk Containers inside the Warehouse. The oils do not contain polychlorinated biphenyls (PCB). After the oil has been removed, the transformers are placed on a steel platform, where the copper components are removed. The metals are stored inside the warehouse pending shipment to authorised metal recyclers.

The batteries are delivered in crates which are stored inside the Warehouse pending the build-up of enough stock for onward transfer to overseas recycling plants.

Refrigerators collected at Waste Electrical and Electronic Equipment (WEEE) drop off centres arrive in articulated trailers, which are temporarily parked before being sent to RILTA's sister company in Northern Ireland for processing.

There are five employees, comprising operatives and administrative staff.

5.0 Proposed Changes

It is proposed to install a bagging plant and pallet racking for the storage and transfer of the APCR. The bagging plant will comprise

Three storage silos, with a combined capacity of 525m^3;

A pressure transfer system;

Two bulk bag loading systems (one duty and one stand-by), and a

Pallet racking system

Approximately 30,000 tonnes of APCR will be accepted, bagged and temporarily stored at the installation annually. The APCR will be delivered in road tankers that will drive into the Warehouse where the materials will be pneumatically transferred into the storage silos located in the south-west corner of the building.

The APCR will be discharged from the silos into the duty bagging unit, where bulk bags will be filled. The bags will then be stored on the pallet racking until they are transferred from the installation by articulated trailer.

6.0 Class of Activity

The current licence was granted in May 2004. In January 2014, the Licence was amended to bring it into line with the EU Industrial Emissions Directive. The authorised waste activities are:

Class	Description
11.1	The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in this Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required.
11.2 (b)	Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving the following activities: (b) physico-chemical treatment (c) blending or mixing prior to submission to any of the other activities listed in paragraph 11.2 or 11.3 (d) repackaging prior to submission to any of the other activities listed in paragraph 11.2 or 11.3 (f) recycling or reclamation of inorganic materials other than metals or metal compounds
Class	**Description**
11.6	Temporary storage of hazardous waste, (other than waste referred to in paragraph 11.5) pending any of the activities referred to in paragraph 11.2, 11.3, 11.5 or 11.7 with a total capacity exceeding 50 tonnes, other than temporary storage, pending collection, on the site where the waste is generated.

The bulking and transfer of the APCR falls under Class 11.2 (b)(d) and Class 11.6

7.0 BAT / BREF Documents

RILTA carried out a review of the proposed changes against the BAT Conclusions and Recommendations on best practice in the following guidance documents:

- Reference Document on Best Available Techniques for the Waste Treatments Industries 2006
- Reference Document on Best Available Techniques on Emissions from Storage 2006.
- Reference Document on Best Available Techniques Waste Incineration 2006

Assessments of how the facility complies with the BAT Conclusions on Waste Treatment, Storage and Waste Incineration have been completed.

8.0 Waste Management Policies

The current Waste Management Plan for the Eastern-Midlands Region 2015-2021 was published in May 2015. The Plan recognises the significant advances in the development of thermal recovery capacity in Ireland, where the principal use of the waste is as a fuel to generate energy.

It is policy of the Plan to improve regional and national self-sufficiency of waste management infrastructure for the reprocessing and recovery of particular waste streams in accordance with the proximity principal.

The Dublin Waste to Energy (WtE) Facility is now operational. This is a critical infrastructure project and has been clearly outlined in Waste Management Plans for the Region for some time. The generation of APCR is an inevitable consequence of the operation of the WtE facility and there is currently no recovery/disposal outlet for the APCR in Ireland. The proposed change at the RILTA installation is to accommodate the export of the APCR for disposal/recovery.

9.0 Raw & Auxiliary Materials and Energy Usage

Raw materials and energy that are and will be used include:-

- Diesel
- Hydraulic oil and engine oil
- Electricity
- Water

10.0 Sources of Emissions

The actual and potential emissions from the site are:

- Vehicle exhaust gases from the delivery and collection vehicles.
- Noise from plant and equipment used to process the wastes; including delivery/collection vehicles, cutting equipment, forklifts and bagging plant.
- Surface water run-off from the paved areas.
- Sanitary wastewater.
- Dust from waste processing and from vehicle movements on yards during dry weather.

11.0 Site Location.

The facility is located in the Greenogue Business Park, approximately 1.5km east of Newcastle. The surrounding land use is a mix of commercial and industrial activities.

12.0 Existing Environment, Potential Environmental Effects and Mitigation Measures

12.1 Climate

The climate in the area is mild and wet, with the prevailing wind direction from the south west. All new developments that give rise to extra direct and indirect greenhouse gases (GHG) emissions are considered to have a negative effect on climate. There will be no increase in the waste acceptance rates and therefore no increase in GHG from the waste transport vehicles. The waste processing will be more energy intensive than those currently carried out.

12.2 Soils and Geology

The site is entirely paved. The depth to bedrock on the site is >3.0 m. The bedrock comprises dark grey, fine grained, graded limestones with interbedded black, poorly fossiliferous shales of the Lucan Formation. The proposed change does not involve either any ground disturbance, or emission to ground. The current licence requires the routine inspection of all underground pipes and tanks to ensure they continue to be fit for purpose and do not leak. The development will have no impact on soils and geology.

12.3 Water

The site lies in catchment of the Griffeen River, whose main channel is approximately 300m east of the site.

Sanitary wastewater discharges to an internal foul sewer that connects to the foul sewer serving the Business Park Irish Water foul sewer. There are two separate surface water drainage systems. The first collects the rainwater run-off from the building roof and this is discharged via a 180m^3 flow attenuation tank to the storm sewer serving the Business Park. The second collects rainwater run-off from paved areas and weighbridge and this passes through a Class 1 oil interceptor before entering the attenuation tank. The outfall from the attenuation tank connects to the fouls sewer.

The proposed changes will not present an increased risk of flooding either within, or outside the site boundary. They will not affect the quality of the run-off to the municipal foul sewer.

The bedrock is classified as a poorly productive aquifer. The development will not have any impact on the rainfall contribution to groundwater and, as there will be no new emissions to ground, there will be no impact on groundwater.

12.4 Ecology

The entire site is either paved or covered by buildings. There are no habitats of any ecological importance within the site boundary and the habitat values of the surrounding lands are low. The site is not inside the boundary of any designated protection area (Natura 2000 Sites) and the development will not result either in direct loss of any habitats, or damage to a Natura 2000 Site.

The closest Natura 2000 Site with the potential to be impacted by site operations is the Rye Water Valley/Carton SAC which is 7 km north of the site. An Appropriate Assessment Screening has been completed and it confirms that the proposed change will not have any significant impacts on any Natura 2000 Sites.

12.5 Air Quality

The ambient air quality is good and the routine dust monitoring carried out in accordance with the current licence confirms dust is not an issue. Odours from the existing waste activities are not a cause of nuisance and the APCR is not odorous. The acceptance of the APCR will not result in additional traffic movements and associated exhaust gases. The application does not seek to retain the existing authorised emission point to air (TfA1).

12.6 Noise

The noise levels in the Business Park are typical of an area zoned for industrial use. All waste processing is and will be carried out indoors. The existing activities are sources of noise and the current licence sets noise emission levels and requires noise surveys to be conducted. These surveys have confirmed that RILTA complies with the emission limits and that the noise levels in the vicinity of the site are typical of an industrial area. The noise emissions from the bagging plant will be lower than those from equipment that previously operated at the installation.

7 Traffic

The proposed change will not result in any increase in the amount of waste accepted, meaning there will be no alteration to current traffic movements to and from the site. The local road network will not be affected

12.8 Human Beings

Land use in the surrounding area is a mix of industrial and commercial activities. The nearest house is approximately 368m from the site boundary. There are no hospitals, hotels or holiday accommodation within 1 km of the site.

12.9 Material Assets

The site is in an area zoned for industrial and related development, and it does not have a significant leisure or amenity value. The proposed changes will have no impact on amenities and leisure land use in the vicinity of the site.

13.0 Proposed technology and other techniques to prevent or eliminate, or where this is not practicable, limit, reduce or abate emissions from the installation

The design and method of operation of the existing installation are based on the requirements of the European Commission's Reference Document on Best Available Techniques for the Waste Treatment Industries 2006 (BREF), which specifies the Best Available Techniques (BAT) for Waste Management Facilities.

The current licence specifies the manner in which the installation must operate so as to ensure that pollution and or nuisance to neighbours and the general public is prevented.

It requires the site management team to have the appropriate training and qualifications; identify the types of wastes and processes that can be carried out; specify how wastes and raw materials that have the potential to cause pollution are handled and stored; the control measures that must be applied to prevent nuisance, for example dust suppression, and require appropriate emergency response procedures to be in place. Rilta has prepared

a dust prevention and mitigation procedure for the APCR bagging and has revised the emergency response plan to include this activity.

14.0 Measures to Comply with Waste Management Hierarchy

The use of municipal solid waste as a fuel to generate energy is classified as a recovery activity and is higher in the Waste Management Hierarchy than disposal to landfill. The generation of the APCR is an inevitable consequence of this recovery activity. At present there are no hazardous waste recovery/disposal installations in Ireland that can recover/dispose the material and the only option is export to recovery/disposal facilities in Europe.

15.0 BAT

Condition 2 of the current Licence requires RILTA to develop and implement an Environmental Management System for the facility. The licence also requires RILTA to prepare operational control procedures for all waste activities and ensure that facility staff are provided with the appropriate skills and training to perform their assigned functions.

Assessments of compliance with the BAT Conclusions in the References documents on Best Available Techniques for Waste Treatment, Emissions From Storage and Waste Incineration BAT Reference Documents have been completed.

16.0 Abnormal Operating Conditions

RILTA has prepared and adopted an Accident Prevention Policy (APP) and Emergency Response Plan (ERP). The APP specifies the approach taken to prevent accidents from occurring and the ERP identifies all potential hazards at the site, including the bagging operation that may cause damage to the environment and human health and also specifies roles, responsibilities and actions required to deal quickly and efficiently with all foreseeable major incidents and to minimise environmental impacts.

17.0 Avoidance of the Risk of Environmental Pollution due to Closure of the Installation

RILTA has prepared a Decommissioning Management Plan (DMP) for the facility that specifies the actions that will be taken to avoid the risk of environmental pollution due to the closure of the facility, including unexpected closure. The DMP along with a proposal for Financial Provision, were submitted to OEE in December 2016.

18.0 Environmental Monitoring:

Environmental monitoring is and will continue to be carried out in accordance with the current licence conditions. The monitoring includes noise, dust, surface water and foul sewer emissions.

Dust

Dust is and will be monitored annually. It is currently monitored three times a year at four locations (D1 – D4).

Noise

Noise is monitored annually at the three existing monitoring locations (N1 – N3).

Surface Water

Surface water monitoring is carried out quarterly at one location (SW1) in accordance with existing licence conditions.

Wastewater

The licence requires monitoring of process wastewater emissions. However as the current activities do not generate a process wastewater monitoring is not currently carried out.

Air

The licence requires monitoring of air emissions from a point source (TfA1). However as the current activities do not give rise to a point emission source monitoring is not carried out. The application does not seek to retain authorisation of the TfA1.

19.0 Measures to Comply with an Environmental Quality Standard

The emission limit values set in the current licence and those that will be set in the revised licence are and will be based on achieving compliance with the relevant EQS.

20.0 Measures to comply with Council Directive 80/68/EEC and 2006/118/EC in relation to the protection of groundwater.

There are no direct discharges to groundwater and the main operational areas of the site are covered by roofs and concrete yards.

21.0 The Main Alternatives to the Proposed Technology, Techniques and Measures

Alternative Sites

The original EPA inspector's report for the WtE facility (Ref. No. W0232-01, 21 June 2007) states that the flue gas treatment residues (APCR) are expected to be classed as hazardous and will be sent off site for disposal in an approved hazardous waste facility. It further states that if suitable landfill is not available in Ireland for the non-recoverable residues, then export of the residues will be necessary.

While the disposal/recovery of the APCR within the state is the preferred option, there is no such outlet available the only alternative is export. The alternative to RILTA's existing hazardous waste management installation would be to develop a new standalone installation. This would require the acquisition/leasing of land, the construction of a new waste processing building and supporting infrastructure and the provision of new site services. The development of such a new facility offers no environmental advantages compared to proposed changes at RILTA's existing installation.

ATTACHMENT 3

NON-TECHNICAL SUMMARY

1.0 Introduction

1.1 The Applicant

RILTA Environmental Limited (Rilta) is now part of the Enva Group and operates two licensed waste management facilities in Greenogue Business Park, from where it provides hazardous waste management services to commercial and industrial customers.

1.2 Facility Overview

The Business Park was initially developed in 2003. Prior to development, the land was used for agricultural purposes. The facility was constructed and started operations under an EPA Waste Licence in December 2004. In 2014 the EPA amended the licence to bring it into compliance with the Industrial Emission Directive. In 2016 Rilta applied for a licence amendment to allow the acceptance and bagging of air pollution control residue. The EPA considered this change could not be accommodated by an amendment and subsequently Rilta submitted a licence review application.

It is proposed to accept an additional 33,000 tonnes of Air Pollution Control Residue (APCR). The APCR, which will be produced at non-hazardous waste incinerators and cement plants that use waste as a fuel, will be classified as hazardous waste.

2.0 Planning and Development Context

The facility is located in the Greenogue Business Park, approximately 1.5km east of Newcastle. It encompasses 0.5ha and is occupied by a main warehouse, a small warehouse, waste storage pods and an office and weighbridge.

The area is zoned for enterprise and employment related use, which includes appropriate waste management facilities. Planning permission for the original development was granted in 2002 and the proposed change does not require a new permission.

3 Assessment of Need

The foundation policy statement on waste management *"Changing Our Ways"* bases national policy on the EU Waste Management Hierarchy, which in descending order is:

- Prevention
- Preparing for Reuse
- Recycling
- Other Recovery (including energy recovery) and
- Disposal

The most recent Policy Statement '*A Resource Opportunity Waste Management Policy In Ireland 2012*' is also based on the EU Waste Management Hierarchy and sets out how the higher tiers can reduce Ireland's reliance on finite resources, virtually eliminate reliance on landfill, and minimise the impact

of waste management on the environment. It is a policy objective that when waste is generated, the maximum value must be extracted from it by ensuring that it is reused, recycled, or recovered.

The Dublin Waste to Energy (WtE) Facility is now operational. This is a critical infrastructure project, and has been clearly outlined in Waste Management Plans for the Region for some time. There is currently no recovery/disposal outlet for the APCR in Ireland. The proposed development is to accommodate the export of the material for recovery/disposal pending the development of indigenous recovery/disposal outlets.

4. Alternatives Examined

The facility already has an EPA licence, has the capacity to accommodate the proposed development and is located in an area with excellent transport connections. The only alternative would be to acquire a new site, apply for planning permission and an IE licence and provide the required infrastructure. This offers no environmental and economic benefits compared to the use of the existing facility.

5. Description of Existing Site and the Proposed Development

5.1 Site Location & Layout

The facility is located in the Greenogue Business Park, approximately 1.5km east of Newcastle. The site encompasses 0.5ha and there are three adjoining buildings – main warehouse, a smaller external warehouse and three no. waste storage pods and the offices. There is a weighbridge at the site entrance. There is a redundant backup generator in a bund in the north-eastern corner of the site. The open yards (2,760m^2) are paved with a 120mm reinforced concrete slab.

5.2 Surrounding Land Use

The land use in the vicinity of the site is a mix of commercial and industrial. Casement Aerodrome is approximately 350m to the north of the site. The closest private house is approximately 400m to the west.

5.3 Waste Activities

Current waste processing activities are confined to the acceptance and processing of electrical transformers in the main warehouse and storage of asbestos waste in the waste storage pods and the small warehouse. Refrigerators collected at WEEE drop off centres arrive in articulated trailers, which are temporarily parked pending the completion of the appropriate documentation, before they are sent to Northern Ireland for processing.

To facilitate the bagging and storage of the APCR the processing of the transformers will be moved to the small warehouse. A bagging plant and pallet racking will be installed in the main warehouse.

5.4 Waste Types & Quantities

The current licence authorises the acceptance of 60,000 tonnes of waste, of which 33,000 tonnes is hazardous. In addition to the waste types already authorised for acceptance it is proposed to accept APCR, boiler ash and fly ash. The APCR will comprise the majority of the new waste types.

5.6 Environmental Monitoring

The licence requires routine surface water, groundwater, dust deposition and noise monitoring at specified monitoring locations

5.7 Accidents

Rilta has prepared and adopted an Accident Prevention Policy and an Emergency Response Procedure that specifies roles, responsibilities and actions required to deal quickly and efficiently with all foreseeable major incidents and to minimise environmental impacts. Rilta has completed an Environmental Liability Risk Assessment (ELRA) which has identified the plausible accidents/incidents that may occur and evaluated the associated environmental effects. Based on the types of waste that are and will be accepted and the activities carried out, the only accident that presents a significant risk of environmental pollution is a fire. Rilta has completed a Firewater Retention Assessment.

6 AIR

6.1 Receiving Environment

The ambient air quality in the vicinity of the site is good and the dust deposition monitoring carried out by Rilta has established that dust emissions from waste operations are not a problem.

6.2 Impacts

The potential emissions to air from the waste activities that are and will be carried out include dust and vehicle exhausts. There is an authorised point emission source (TfA1) but this has never been operational and will not be in the future.

6.3 Baseline Scenario

If the proposed development does not proceed there will be no new point and fugitive emission sources, the facility will continue to operate as is, and there will be no change to the potential impacts on air quality.

6.4 Prevention & Mitigation Measures

Rilta implements the control measures specified in the current licence that are designed to ensure waste activities do not give rise to negative impacts on air quality and these will continue to be applied. The trucks that transport the wastes are typically fitted with Selective Catalytic Reduction (SCR) systems.

The transfer of the APCR will be managed by a silo control system that will also control the safety system which will include a top air vent jet filter, pressure sensor, level sensors and pinch valves on the delivery hoses. Fast acting doors will be fitted on the building and these will only be opened and closed when the APCR is being delivered and the bagged APCR is being transferred.

In the unlikely event of a failure in the powder transfer resulting in the release of the contents on the building floor, the APCR will be collected using a dedicated industrial cleaning unit which will vacuum up the material.

6.5 Assessment of Impacts

The proposed development will not give rise to any new point emissions to air. There will be no addition traffic movements and therefore no change in the nature and volume of vehicle exhausts. There is the potential for fugitive emissions from the APCR processing and appropriate mitigation measures will be implemented.

6.6 Residual Impacts

The proposed development will have an ongoing imperceptible, negative impact on air quality, but will have no permanent impact.

7 Population & Human Health

7.1 Receiving Environment

Newcastle is approximately 1.5km to the west, while Rathcoole is 2km to the south. In the 2016 census, South Dublin had a population of 278,767. The population in Newcastle was 3,093 and in Rathcoole was 4,351.

7.2 Impacts

Vehicle exhaust gases can affect air quality with consequent implications for human health. While odours, noise and dusts do not present a direct risk to health, they can be a significant nuisance and cause of discomfort that may indirectly affect human health. Traffic movements can, depending on the size, location and capacity of the local road network, be a cause of congestion that affects local residents.

The site is not in an area susceptible to natural disasters (earthquake, landslide, major flood events); however accidents with the potential to impact on the health of site staff and neighbours could occur. Rilta has completed an environmental risk assessment that identifies the plausible accidents that could occur and assess the likely effects.

7.3 Baseline Scenario

If the development does not proceed, the facility will continue to operate in its current configuration with no change to the potential impacts on population and human health

7.4 Prevention & Mitigation Measures

Rilta implements the control measures specified in the licence to ensure waste activities do not give rise to noise and dust emissions that will be a cause of nuisance or impairment outside the facility boundary. The licence conditions also require the provision of mitigation measures, both infrastructural and procedural, that effectively minimise the risk of environmental liabilities associated with major accidents.

7.5 Assessment of Impacts

The ambient air quality in the vicinity of the site is good and the routine dust monitoring carried out confirms dust is not an issue. Odours from the existing waste activities are not a cause of nuisance

and the APCR is not significantly odorous. The most recent noise survey was completed in February 2018 and confirmed noise emissions from the site complied with the limits set in the licence.

The acceptance of the APCR will not result in additional traffic movements and will not contribute to increased traffic congestion in the vicinity of the Business Park. The remedial measures that may be required in response to a major accident include spill containment; demolition and removal of damaged buildings, cleaning of the foul sewer, excavation and removal of contaminated soils and reinstatement and groundwater clean-up.

7.6 Residual Impacts

The proposed development will have an on-going, imperceptible, negative impact on human beings,

8. Land and Soil

8.1 Receiving Environment

The subsoils beneath the site are between 3 and 5 m thick and comprise grey silty clay and are underlain by limestone bedrock.

8.2 Impacts

The development does not involve any ground disturbance and will not result in any new emission to ground.

8.3 Baseline Scenario

If the proposed development does not proceed current operations will continue, with no change to the potential impact on land and geology.

8.4 Prevention & Mitigation Measures

The current prevention and mitigation measures include; the routine inspection and survey of the surface water and foul water drainage systems; the adoption of an emergency response procedure and staff training on appropriate spill response actions.

8.5 Assessment of Impacts

At present there are no direct or indirect emissions to ground and the proposed change will not give rise to any new emissions. The entire site is either paved with concrete, or occupied by buildings that prevent accidental seepages to the soils.

8.6 Residual Impacts

The proposed development will have no impact on land and soil.

9. Water

9.1 Receiving Environment

The site is in the catchment of the Griffeen River, whose main channel flows in a broad south-west to north-east direction approximately 300 m east of the site, eventually joining the River Liffey near Lucan. The Griffeen River is part of the IE_EA_Liffey Water Management Unit. The Griffeen Lower Water Body Status Report states that the overall status is 'Bad', and is considered 'At Risk' of not achieving its restoration objective of at least 'Good' status by 2027.

The bedrock is a locally important (Ll) aquifer that is productive in local zones. Groundwater yields in the formation range from 5.45 - 9 cubic meters per hour. The aquifer vulnerability to pollution from the ground surface is High. The aquifer is part of the Dublin Area Groundwater Body, which is categorised as being of 'Good' status, but is 'At Risk' of achieving its objective of protecting the existing status.

9.2 Impacts

Sanitary wastewater and rainwater run-off from the building roof and paved open areas discharges to the foul sewer that serves the Business Park. The proposed development will not result in any change to the volume and quality of the rainwater run-off. The proposed development does not require any alteration to the existing foul and surface water drainage layout, and will not result in any change to either the quality or quantity of the discharge.

There is the potential for accidental releases of the ARCR, oil leaks from the mobile plant and firewater run-off in the event of a fire. The potential pathway to surface waters is overland flow to road side gullies on the access road. The pathways to groundwater are infiltration through damaged paving and leaks from the storm drains.

9.3 Baseline Scenario

If the proposed development does not proceed current operations will continue, with no change to the potential impact on water from the on-going operations.

9.4 Prevention & Mitigation Measures

The current mitigation measures include the provision of an oil interceptor on the surface water drains that collects run-off from the yard and weighbridge; the inspection and repair of the paved areas; impermeable paving across the operational areas; the routine inspection and survey of the surface water and foul water drains; the adoption of an emergency response procedure, and staff training on appropriate spill response actions.

There is one gate valve on the foul sewer and three drains on the surface water network that can be closed in the event of an incident at the site that has the potential to contaminate surface water.

9.5 Assessment of Impacts

The proposed development will not result in any changes to the volume and quality of the rainwater run-off, will not give rise to any new emission to ground and ground water and will have no impact on groundwater.

9.6 Residual Impacts

The proposed development will have no impact on water.

10 Climate

10.1 Receiving Environment

The climate in the area is mild and wet, with the prevailing wind direction from the south-west, with occasional winds from the east. The likelihood of a unique specific microclimate is very low.

10.2 Impacts

There is a link between greenhouse gas emissions and climate change. Direct emissions from waste management facilities are associated with on-site processing and off-site electricity power generation, while indirect emissions are linked to the vehicles transferring wastes to and from the site and staff transport.

10.3 Baseline Scenario

If the development does not proceed the current waste activities will continue with no changes to the potential for impact on climate.

10.4 Prevention & Mitigation Measures

Rilta has completed an assessment of energy usage and potential measures to improve efficiency. The controls on the air compressor used to transfer the APCR will include airflow and air pressure diagnostics to maximize efficiency. The fans on the reverse jet filters plant will be designed to give high-energy efficiency.

10.5 Assessment of Impacts

All greenhouse gas emissions contribute to a cumulative negative climate change effect unless offset by mitigation or compensatory measures. The proposed development will result in additional greenhouse gas emissions associated with the increased electricity consumption. There will be no addition traffic movements and therefore no change in the nature and volume of vehicle exhausts.

10.6 Residual Impacts

The proposed development will have an ongoing imperceptible, negative impact on air quality.

11 Cultural Heritage

11.1 Receiving Environment

There is no record of any cultural heritage feature within the site boundary and it is not in a designated Architectural Conservation Area.

11.2 Impacts

The proposed development will not involve any ground disturbance and therefore there will be no risk of affecting unidentified archaeological features.

11.3 Baseline Scenario

If the development does not proceed the facility will continue to operate and the potential for impacts on the cultural heritage will remain unchanged.

11.4 Prevention & Mitigation Measures

As the proposed development will not have any impact on any cultural heritage feature, prevention and mitigation measures are not required.

11.5 Assessment of Impact

The development will have no impact on any known/unknown cultural heritage feature.

11.6 Residual Impacts

The development will no impact on any known/unknown cultural heritage feature.

12 Biodiversity

12.1 Receiving Environment

The buildings and yards on the site and in the surrounding lots are 'BL3 Buildings and artificial surfaces'. 'BL3' includes all buildings (domestic, agricultural, industrial and community) other than derelict stone buildings and ruins, and areas are covered with artificial surfaces (e.g. roads, car parks, pavements, runways, and yards). These habitats are typically not species diverse and the likelihood of protected species within the site boundary is very low.

The site is not in either a Special Area of Conservation, or a Special Protection Area and the closest site is the Rye Water Valley/Carton SAC, which is 7km to the north.

12.2 Impacts

The proposed development will not result in the loss of any habitats either inside, or outside the site boundary. There is no pathway between the site and the nearest Natura 2000 sites and the proposed development will have no impact on the designated sites.

12.3 Baseline Scenario

If the proposed development does not proceed the current activities will continue with no change to the risk presented to biodiversity.

12.4 Prevention & Mitigation Measures

As the development will not have any impact on biodiversity either inside or outside the site boundaries and will have no impact on any designated sites, specific prevention and mitigation measures are not required.

12.5 Assessment of Impacts

The proposed development will not result in the loss of or damage to any habitats either in or outside the site boundary. The development site is not in or adjacent to any Natura 2000 Sites. There are no viable pathways between the development site and Natura 2000 Sites.

12.6 Residual Impacts

The proposed development will have no residual impact on biodiversity.

13 Landscape

13.1 Receiving Environment

The facility is an area where the land cover use is industrial/commercial in an established and extensively developed industrial zone. It is not in an area designated as highly sensitive and is not overlooked by any designated views or prospect areas. The shape and mass of the existing buildings are similar to those of other commercial and industrial operators in the estate.

13.2 Impacts

The proposed development does not involve any change to the appearance of the buildings or the site layout.

13.3 Baseline Scenario

If the development does not proceed, the facility will continue to operate in its current layout, with no change to the external appearance of the facility.

13.4 Prevention & Mitigation Measures

As there will be no change to the external appearance of the site prevention and mitigation measures are not required.

13.5 Assessment of Impacts

The proposed development will have no impact on the landscape.

13.6 Residual Impacts

The proposed development will no residual impacts on the landscape.

14 Material Assets

14.1 Receiving Environment

The site is surrounded on all sites by commercial/industrial lots. The Business Park does not have any significant amenity value for members of the general public. The nearest amenity to the site is a football pitch, approximately 220m away. Current activities involve the use of diesel fuelled transport vehicles and mobile plant and electricity. There is a mains water supply to the staff welfare facilities.

14.2 Impacts

The development will not result in any impairment of either amenity value, or agricultural use. The development will contribute to sustaining employment levels at site. The APCR bagging will increase electricity consumption.

14.3 Baseline Scenario

If the proposed development does not proceed, there will be no socio-economic benefit and no increase in natural resource consumption.

14.4 Prevention & Mitigation Measures

Rilta implements the nuisance control measures specified in the licence to prevent impacts on local amenities and also applies resource consumption control measures to minimise usage.

14.5 Impact Assessment

The current operations are not a source of adverse environmental nuisance or impairment of amenities outside the site boundary. There will be an increase in resource consumption (electricity). The proposed development will have a slight socio-economic benefit associated with maintaining local employment levels.

14.6 Residual Impacts

The development will have no adverse impact on amenity values and socio-economic activities in the locality. It will have a slight negative impact in relation to the consumption of electricity, but will have a slight positive local economic benefit.

15 Interaction of the Foregoing

There are actual and potential direct, indirect and cumulative effects of the changes due to interaction between relevant receptors, which are Population & Health/Air and Climate/Material Assets.

15.1 *Population & Health / Air / Noise*

The proposed development has the potential to impact on human beings from noise and dust. The proposed method of operation has taken account of these emissions and effective mitigation measures have been identified.

15.2 Climate / Material Assets

The development will result in an increase in greenhouse gas emissions associated with an increase in electricity consumption.

15.3 Cumulative Effects

The assessment of the impacts of the proposed development took into consideration the impacts of the existing facility. The noise and ambient air quality surveys were conducted during typical operational hours and the predictive assessments include the impacts of both the existing emissions and those associated with the proposed development.