

Planning and Environmental Statement

For

HealthBeacon Limiteds Proposed Healthcare Waste Management Facility

At

Unit 18, Naas Road Business Park, Muirfield Drive, Naas Road,
Dublin 12 (Eircode D12 PF63).

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Document Lead Sheet

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Report History

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1. Introduction

1.1 Background

HealthBeacon Limited (an Irish medical technology company) intend to apply for permissions for the development of a small-scale Healthcare Waste Management Facility at Unit 18, Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12 (Eircode D12 PF63) for the purposes of reducing the quantities of healthcare waste (sharps bins) it generates in the course of its business and the environmental impacts associated with managing and treating this waste.

The applicant intends on accepting its own waste bins on-site which they supply to domestic customers for processing and sterilization. A maximum of 20 tonnes of these waste bins will be accepted on-site per annum. Sharps waste (contained in the bins) will be temporarily stored on-site in regulated containers before being dispatched to an appropriate third-party waste treatment facility. The empty bins will be put through a sterilization process on-site. A small Processing Area consisting of wash room and a clean room will be developed at the existing premises for the purposes of carrying out this activity. Cleaned bins will then be reused by the applicant in the course of their business. A small waste storage area will be contained within the wash room.

The Proposed Development constitutes a Waste Activity under the Waste Management Act. Thus, a Waste Licence Application will be required for the proposed activity. An application for a Waste Licence will be made to the EPA in conjunction with the submission of a planning application to the Planning Authority.

The proposed waste activity results in sustainability benefits. There will be a reduction in the amount of waste incinerated due to the re-use of the 2.3 litre sharps bin, as opposed to their incineration. Consequently, there will be an overall reduction in indirect Carbon dioxide emissions associated with existing company activities. The reuse of the 2.3 litre bins will also ensure greater levels of resource efficiency.

1.2 Purpose of the Document

This Planning and Environmental Statement has been developed to the following purposes.

- To provide a description of the Application Site and the Local Area.
- To describe the Planning and Policy Context pertaining to the proposed development, how the Proposed Development conforms to the Dublin City Development Plan 2016-2022 and the need for the Proposed Development.
- To describe and characterize the receiving/baseline environment surrounding the Proposed Development site.
- To describe the Proposed Development, the Proposed Waste Activity, Proposed Facility Operations and Proposed Facility Management.
- To describe Emission and Environmental Controls that will be adopted to ensure the Proposed Development does not have a significant, adverse impact upon the receiving/baseline environment.
- To determine whether the Proposed Development should be subject to an Environmental Impact Assessment (EIA Screening).
- To determine whether the Proposed Development should be subject to Stage 2 Appropriate Assessment (Stage 1 Appropriate Assessment Screening).

This document will be submitted alongside the Planning Application Form pertaining to the Proposed Development.

2. Site Description

The proposed facility will be situated in a commercial/light industrial premises situated in Naas Road Business Park, just off the Naas Road in Dublin 12. The address of the site is Unit 18 Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12 (Eircode:D12 PF63). The premises is currently used as an Office and Quality Control Centre by HealthBeacon Limited

The site is situated directly opposite the Naas Road and Luas Red Line and is immediately surrounded by other commercial units contained in Naas Road Business Park. Residences and residential estates are situated in close proximity to the site to the north west, north and north east. Much of the area surrounding the site is characterized by commercial and industrial facilities (west, south west and south of the facility). Lansdowne Valley Park is situated a short distance away to the east of the site. The Grand Canal proposed Natural Heritage Area is situated approximately 500 metres north of the site. The M50 is approximately 2.5 km south west of the site.

A Site Location Map showing the site and the surrounding area adjoins this Planning Application (Drawing Title: OS Sheet)

The aerial photo shown in Figure 2-1 below provides visual overview of the site and surrounding land uses.



Figure 2-1 Aerial Photo showing the Site and its Surroundings

3. Planning and Policy Context /Need for the Proposed Development

The commercial units in which the premises is located were constructed in 1998 (Under Planning Permission No. 1876/97). The site is currently zoned Z14 in the Dublin City Development Plan 2016 – 2022, which is defined ‘Strategic Development and Regeneration Areas.’ The zoning objectives for Z14 zones are as follows: ‘To seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and ‘Z6’ would be the predominant uses.’ Z6 Zone are defined as ‘Employment/Enterprise Zones.’ The zoning objectives for Z6 zones are as follows: ‘To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.’ The proposed development is for the purpose of enterprise and has the potential to improve business economics, strengthen a business, provide further security for existing employees and generate further employment in the locality in a highly specialized, technical area of work. Permissible uses for areas zoned Z14 and Z6 include Science and Technology Based Industry. It is deemed a specialist, small-scale waste transfer facility of this nature constitutes a Science and Technology based enterprise rather than Intensive Waste Industry. Further information on the nature and scale of proposed facility operations is provided in Section 4 which supports this statement. Therefore, the proposed development is deemed to be suitable and appropriate for a site zoned Z14/Z6 under the Development Plan.

In addition to the above, the Proposed Development is deemed to conform to the following Policies defined in the Development Plan:

Table 3-1 Conformance with Development Plan Policies

Policy Number	Policy Objective	Proposed Development Conformance with Policy
CEE15	To promote and facilitate the transformation of regeneration areas, especially inner city areas, as a key policy priority and opportunity to improve the attractiveness competitiveness of the city, including by promoting high-quality private and public investment and by seeking European Union funding to support regeneration initiatives, for the benefit of residents, employees and visitors.	The Proposed Development will create and sustain specialized and technical economic activity in a Strategic Development and Regeneration Area.
CEE22	To promote and facilitate the crucial economic and employment potential of regeneration areas in the city such as Dublin 1, 7 and 8.	The Proposed Development will create and sustain specialized and technical economic activity in a Strategic Development and Regeneration Area.
S120	To prevent and minimise waste and to encourage and support material sorting and recycling.	The Proposed Development will prevent the generation of unnecessary waste and allow for the continued use of a valuable object.

A local area plan (LAP) for the Naas Road lands was adopted by the City Council on 14 January 2013. The overall vision for this area set out in the LAP is as follows:

'To create a great place to work and live, and create a new urban identity for the Naas Road lands area plan by regenerating existing developed lands as a sustainable mixed-use area, capitalising on the area's locational advantages and improving the relationship of the lands to their immediate surroundings through improved linkages, green infrastructure and permeability. As part of this transformation, there will be an increase in the range of land-uses, and improvements in the visual environment, resulting in an increase in street level activity and the general revitalisation of the area.'

It is envisaged the Proposed Development in Naas Road Business Park will contribute positively to the regeneration of the area and general revitalization of the area in accordance with Objectives the LAP given the Scientific and Technological nature of proposed operations. It is noted that it is a priority of the LAP *'to intensify employment uses and secure new employment opportunities in the growth sectors such as digital industries close to public transport, science, green technology, medical research and education.'* It is further noted in the LAP that *'Given the relatively lower land and property rental costs here, it is considered that the area is ideal for sectoral clustering, particularly in those growth sector areas of biotechnology, digital industries, clean/green technologies etc. Such uses could be provided in areas outside of the KDC and commercial cores but within the Z6 and Z14 areas along the Naas Road, Longmile Road and Old Naas Road.* These statements seem to imply that the proposed site is an ideal location for a laboratory scale facility of this nature.

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4. Description of the Proposed Development

4.1 Overview of the Proposed Waste Activity

HealthBeacon Limited intend to apply for permissions for the development of a small-scale Healthcare Waste Management Facility at Unit 18, Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12 (Eircode D12 PF63).

The applicant intends on accepting its own waste bins on-site which they supply to domestic customers for processing and sterilization. A maximum of 20 tonnes of these waste bins will be accepted on-site per annum. Sharps waste (contained in the bins) will be temporarily stored on-site in regulated containers before being dispatched to an appropriate third-party waste treatment facility. The empty bins will be put through a sterilization process on-site. A small Processing Area consisting of wash room and a clean room will be developed at the existing premises for the purposes of carrying out this activity. Cleaned bins will then be reused by the applicant in the course of their business. A small waste storage area will be contained within the wash room.

The Proposed Development constitutes a Waste Activity under the Waste Management Act. Thus, a Waste Licence Application will be required for the proposed activity. An application for a Waste Licence will be made to the EPA in conjunction with the submission of a planning application to the Planning Authority.

Layout Plans showing the design of the proposed facility adjoins this Planning Application (Drawing Ref: 02).

The prospective applicant proposes accepting sharps waste at their premises (EWC Code 18 - 01-03*). A maximum of 20 tonnes of sharps waste will be accepted at the premises per annum for onward transfer. A maximum of 300 kilograms of sharps waste will be stored on-site at any one point in time.

The following Classes of Activity under the Third and Fourth Schedule of the Waste Management Act will be carried out at the proposed facility:

- D13 – Blending or mixing prior to submission to any of the operations numbered from D 1 to 12 (if there is no other D code appropriate, this can include preliminary operations prior to disposal including pre-processing such as, amongst others, sorting, crushing, compacting, pelletising, drying, shredding, conditioning or separating prior to submission to any of the operations numbered D1 to D12).
- R12 - 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 preliminary operations prior to recovery including pre-processing such as, amongst others, dismantling, sorting, crushing, compacting, pelletising, drying, shredding, conditioning, repackaging, separating, blending or mixing prior to submission to any of the operations numbered R1 to R11).

4.2 Description of Proposed Facility Operations

HealthBeacon Limited intend on developing a Healthcare Waste Management Facility at the site. They propose accepting their own UN Approved home sharps bins (2.3 litre) which they supply to domestic customers on-site for processing and sterilization. Used sharps in these bins will be accepted on-site and temporarily stored on-site before being dispatched onwards to an appropriate waste treatment facility. An authorized third-party waste collector holding a Waste Collection Permit will bring the sharps bins containing used sharps to the facility.

Bins will be accepted on-site and brought into the processing room via hand pallet truck where they will be inspected, scanned (electronic tags), weighed and recorded. The bins may be stored in this room before further processing or moved to the lid removal tool where the sharps waste inside will be deposited into an approved 60 litre healthcare sharps bin. The empty 2.3 litre bin and bin lid will be transferred to a washing rack for the Cleaning Process. The Bins and their Lids will undergo a validated washing process in a washing unit using biodegradable disinfectant/detergent. Once the wash process is completed, sterilized bins and their lids will be transferred to a roller conveyor which will in turn transfer the bins to a separate Clean Room. Following this, bins will be relabelled and scanned back into inventory stock. The washing process will be validated and microbial analysis will be performed on a regular basis to ensure adequate cleaning is achieved. Records of sharps bins and used sharps arriving on-site and leaving the site will be maintained.

Once the 60 litre UN approved sharps bins contained in the Processing Area are full, they will be sealed and moved to the storage area. These sealed waste containers will be collected by an authorized waste treatment vendor who will treat the sharps waste in accordance with current regulated standards. Sterilized polypropylene bin lids which cannot be reused due to the lid removal process will be sent for recycling. Wastewater generated during the process will be piped to a 1,000 litre bunded IBC container. Wastewater collected in this IBC on-site will be collected by an authorized third-party hazardous waste collector and disposed of at an appropriate waste treatment facility in accordance with regulatory requirements (following HPLC analysis). Only authorized waste collectors will be used to transfer wastes generated on-site to receiving waste treatment facilities.

A Standard Operating Procedure providing an overview of processing operations and a Process Flow Chart detailing HealthBeacon Limited's ReUse Sharps Container Workflow are shown in Appendix 1.

5. Receiving Environment

5.1 Receiving Human Environment

The application site is situated in a built-up urban area characterized by commercial, light industrial and industrial land uses with some residential land use nearby also.

The site is situated directly opposite the Naas Road and Luas Red Line and is immediately surrounded by other commercial units contained in Naas Road Business Park. Two church centres are situated directly west of the Naas Road Business Park approximately 40 metres south west of the subject premises (Rescue Polish Christian Church and Agape Church Dublin). Residences and residential estates are situated in close proximity to the site in Bluebell to the north east, north and north west. Other residential communities found in the wider area include Drimnagh to the east, Walkinstown to the south, and Ballyfermot and Inchicore to the north. There are a number of churches and schools in the wider area. Much of the area surrounding the site is characterized by commercial, light industrial and industrial facilities (west, south west and south of the facility). A large number of major brownfield sites are situated within the local area.

Lansdowne Valley Park is situated a short distance away to the east of the site. The Grand Canal proposed Natural Heritage Area (pNHA) is situated approximately 500 metres north of the site. Other amenities in the area include Drimnagh Castle and Walkinstown Park.

The site is further characterized by the presence of good public transportation links to the wider metropolitan area, with the local area being a good strategic location on a gateway point into the city from the west. The M50 is approximately 2.5 km south west of the site.

5.2 Receiving Water Environment

A Public Record Drainage Map for the area surrounding the site was reviewed. This map appears to indicate that surface water arising at Naas Road Business Park is collected by the business park drainage system and then directed via surface water gravity mains toward to the Camac River as it runs through Lansdowne Valley Park approximately 100 metre east of the site. The River Camac flow into the River Liffey alongside Heuston Station in Dublin City Centre, which in turn enters Dublin Bay.

Domestic waste water arising at the premises and at Naas Road Business Park generally appears to be directed to a 600 mm Concrete Combined Sewer running through Lansdowne Valley Park and from here is directed to Ringsend Wastewater Treatment Plant. Treated wastewater from Ringsend WWTP is discharged to Dublin Bay.

5.3 Receiving Ground/Groundwater Environment

The business park in which the site is located is underlain by hard-standing ground. The ground underneath the site comprises till chiefly derived from limestone which has low sub-soil permeability and is poorly drained. The site is underlain by a Locally Important Aquifer in Bedrock which is Moderately Productive only in Local Zones. Groundwater vulnerability underlying the site is defined by the Geological Survey of Ireland as High.

5.4 Receiving Ecological Environment

There are no areas of ecological importance within the immediate environs of the site. The site is situated in a business park in a built up, urban area characterized by commercial, light industrial and industrial land uses.

The nearest protected area is the Grand Canal pNHA situated approximately 500 metres north of the site. Lansdowne Valley Park which acts as a local Ecological Network and which contains a number of habitat types of significance is located approximately 80 metres east of the site. Woodland on a bank of the River Camac in Lansdowne Valley Park has been found to contain many indigenous and rare species. The River Camac itself which runs through the park has been identified having an important salmonid system. The Camac River was also highlighted as having a brown trout population. Trout are protected under the Freshwater for Fish Directive.

The site is not situated within or adjacent to any Natura 2000 site, however within a 15km of the proposed development site there are a total 5 SAC's and 3 SPA's. The closest Natura 2000 sites are located within Dublin Bay, and include a wide variety of inter-tidal marine and coastal zoned habitats supporting a range of species including Annex 1 habitat and bird species. There is a hydrological pathway from roof and hard-standing areas in Naas Road Business Park to these Natura 2000 sites. Surface water arising in these roof and hard-standing areas is directed by the business park drainage system to the River Camac which in turn is directed to the River Liffey which in turn flows into Dublin Bay where a number of Natura 2000 sites are situated.

5.5 Receiving Air/Noise Environment

As discussed, the site is situated in a built up, urban area. Naas Road which is situated opposite the site is an important transportation corridor into Dublin City and is characterized by substantial levels of road traffic as well as the presence of the Red Luas line. As has already been discussed, the area surrounding the site is characterized by commercial, light industrial and industrial land uses.

The local area therefore can be characterized as quite a loud and busy noise environment.

Ambient air quality in the local area is likely to be somewhat effect by emissions to air from traffic and land uses in the area. The nearest EPA Ambient Air Quality monitoring station is the Ballyfermot station which records PM_{2.5}, PM₁₀ and NO₂. PM₁₀ levels were breached at this monitoring point 7 times in 2019 (The particulate matter, PM¹⁰ daily limit of 50 ug m⁻³ is deemed breached if more than 35 exceedances occur in a calendar year), whilst NO₂ levels were breached 0 times in 2019. There is no hourly or daily limit value for PM_{2.5} therefore PM_{2.5} results could not be compared with the applicable limit.

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6. Emission and Environmental Control and Mitigation

6.1 Emissions to Ground, Groundwater or Surface Water

The proposed activity will not give rise to aqueous emissions to ground, underlying groundwater or any surface water body

Wastewater from the wash process will be collected in a bunded IBC situated in a designated wastewater storage area before being collected from the site by an authorized waste collector and sent to an appropriate waste treatment facility.

The Wastewater Storage IBC on-site will be double skinned in order to prevent the accidental release of wastewater in the event the interior IBC ruptures. A spill kit and suitably sized spill containment barrier will be provided adjacent to the IBC for containing any accidental releases that make their way onto ground and to prevent the run-off of spilled wastewater outside roller doors and into the drainage system serving the business park. An Emergency Response Procedure comprehensively detailing Spill Response Procedures will be in place. Relevant staff will be trained in these procedures and given training in the use of the spill kit/barrier. Where other chemicals are stored on-site in small quantities (E.g. disinfectant) they will be stored in a cabinet situated in the waste processing area suitable for chemical storage and which offers secondary containment.

Wastes arriving on-site will be contained in an enclosed sharps bin. Waste handling and storage activities will take place indoors in the processing rooms. No wastes will be handled or stored areas outside the processing room or outdoors. As such, there will be no possibility of stormwater coming into contact with waste being handled or stored at the facility and then being discharged to the environment.

6.2 Emissions to Sewer

The proposed activity will not give rise to aqueous emissions to sewer. Wastewater from the wash process will be collected in a bunded IBC on-site before being collected from the site by an authorized waste collector and sent to an appropriate waste treatment facility.

6.3 Emissions to Air

There will be no emissions to air of significance associated with the proposed development.

Space heating requirements are provided by a small gas boiler that serves the premises. This boiler will result in the release of minor levels of combustion gases associated with natural gas combustion (e.g. CO and NO_x). Given its size it is not considered to be a significant source of emissions to air according to EPA Criteria on minor emission sources (rated thermal input is <1MW for each).

Sterilization will be carried out using a small wash unit which will be powered by mains electricity. There will be no plant or equipment used in connection with the proposed development that will give rise to emissions to air of any significance.

At similar but much larger installations which utilize large autoclaves for sterilization of sharps waste in bulk, a risk exists that bioaerosols can be discharged in stream existing the facility through the ventilation system. No such risk exists in this instance given the nature and small scale of the operation.

No sharps waste will undergo sterilization at the proposed facility. Only sharps waste bins will undergo the sterilization process in the wash unit on-site. Sterilization of the bins will be carried out in a small wash unit only capable of sterilizing small numbers of 2.3 litre sharps waste bins at any one time. It can be expected that the sterilization process will eliminate any residual microorganisms contained in sharps bins. A small vent will serve the Wash Area however it is expected minimal levels of steam will be released from the wash unit as it will only be carrying out a 10 - 40 degree Celsius sterilizing wash well below the boiling point of water.

It is therefore envisaged that negligible levels of bioaerosols will be emitted during the wash process. It is proposed to carry out swab testing of working areas, the vent and the ceiling initially to verify that the transmission of infectious microorganisms to work surfaces or air is not taking place. This will be for the purposes of ensuring staff safety.

6.4 Noise Emissions

A facility of this nature and scale will not give rise to any noise emissions of significance. There will be no plant or equipment situated on-site giving rise to significant levels of noise. All waste handling and storage activities will take place indoors in designated areas. It is not envisaged that vehicle noise associated with the proposed activity will be significant given the type and volume of traffic transporting waste to the site (<1 consignment contained in a commercial van per day). In addition, the existing noise environment is already characterized by heavy traffic, tram noise, and commercial, light industrial and industrial noise. It is therefore envisaged that there will be a negligible impact on the local environment or surrounding receptors in terms of noise.

6.5 Infection Control

A Standard Operating Procedure (SOP) has been developed to ensure that waste processing reduces risks associated with infectious materials to negligible to very low levels (contained in Appendix 1).

Sharps waste arriving on-site will be in UN Approved, sealed, rigid 2.3 litre bins. These bins will be clearly marked with the appropriate label indicating the contents are potentially infectious. Waste bins arriving on-site which are ruptured or which are leaking will be deposited in a quarantine container situated in the designated waste storage area before being promptly removed off-site.

In line with relevant EPA BAT Guidelines SOP's will be developed covering procedures for dealing with accidents, incidents and spillage, e.g., the appropriate first aid measures for sharps injuries, use of spillage kits and disinfectants. A spill response procedure will be in place and a spill kit will be provided on-site to ensure spilled materials are cleaned up safely and effectively, with waste from spill clean-up being deposited in the aforementioned quarantine container. All relevant staff will be provided training and re-training as necessary in operational and health and safety related procedures.

Suitable personal protective clothing and equipment will be used by staff who are involved in the handling of waste on-site or who may otherwise carry out work in waste handling, processing or storage areas e.g., cut resistant gloves, cut resistant sleeves, cut resistant apron, leg protectors, cut resistant footwear, face visors. Suitable washing facilities will be provided in the Wash Room for those handling waste. All workers who handle waste arriving on-site or who may otherwise carry out work in waste handling, processing or storage areas will be obliged to undergo worker immunisation and regular health monitoring, e.g., for Hepatitis B and tetanus.

The designated waste storage area on-site will be clearly marked and delineated. All waste storage containers in this area will be UN Approved and sealable. These containers will also be clearly marked with the appropriate label indicating the contents are potentially infectious.

Prior to commencement of operations a Health and Safety risk assessment will be carried out on site to assess the risks to workers associated with facility operations and further identify and clarify the appropriate protection and control measures required. The risk assessment will be reviewed on a yearly basis or where there is a significant process change. The company's Safety Statement will be revised as necessary.

6.6 Nuisance Control

6.6.1 Odour

The sharps waste being accepted on-site is generally not odorous but due to potential for small residues of biological material being contained on sharps waste and in sharps waste bins, a very small risk remains that waste arriving on-site may generate odour of some offensiveness if not handled, stored and controlled properly. Sharps waste arriving on-site will only be accepted in sealed sharps waste bin containers. Sharps waste bins should only be opened and sharps waste should only be handled/processed/stored in the designated, enclosed waste processing area. Sharps waste generated in this area will be subsequently transferred to the designated waste storage area and placed in a sealed UN approved container. This sharps waste will be removed from the premises as soon as practicable and, in any case, within 48 hours of arrival or within 72 hours at public holiday weekends, in accordance with relevant EPA BAT Guidelines.

A Standard Operating Procedure (SOP) defining safe procedures for processing will be in place. This SOP will explicitly state the requirements for sharps waste to only be handled in the aforementioned designated areas in a tightly controlled manner. All staff involved in the handling and processing of waste arriving on-site will be provided training in this SOP. Regular inspections will take place to ensure adherence to SOP's and to ensure wastes are not being exposed outside designated areas. Sharps waste receptacles contained in the waste processing area will be sealable in order to prevent the release of any odour from these receptacles. The roller door at the facility will be kept shut normally except during the occasional site delivery in order to minimize the release of any odorous air that might accidentally arise from inside the facility.

With the adoption of the above control measures, and considering the small volume of sharps waste that will be present on-site at any one point in time it is considered that there is no likelihood that the proposed facility will give rise to any odours of significance.

6.6.2 Litter

The potential for the generation of litter in or around the site is negligible given the procedures that will be in place for accepting and controlling this waste on-site. All Sharps Waste arriving on-site will be accepted in enclosed, fully sealed bins. These bins will be rigid therefore eliminating the potential for the spill of waste during transportation or on-site handling. Sharps waste will only be handled, processed and stored in designated areas inside the building. Sharps waste arising on-site will be stored in sealable, rigid containers prior to onward transfer.

It is highly unlikely any unauthorized wastes which may give rise to litter or unsightliness will arrive on-site given the 2.3 litre bins which form part of the smart sharps container used by company customers are used exclusively for the deposit of sharps waste. Customers have no access to these bins other than when depositing used sharps into them. Notwithstanding this, Waste Acceptance Procedures have been developed to minimize the potential for any unauthorized waste arriving on-site. This ensures the highest level of control possible with regards to waste acceptance and control at the facility. In the highly unlikely event unauthorized waste is deposited into a 2.3 litre sharps bin by a customer and is accepted on-site, this waste will be separated, treated as infectious waste and quarantined in a designated, sealable quarantine container in the processing room inside the building. This waste will ultimately be collected from the premises by an appropriately authorized waste collector for treatment at an appropriate treatment facility. As such, there is no opportunity throughout the process for any litter to be generated inside or in the vicinity of the proposed facility.

6.6.3 Vermin

The potential for the generation of vermin in or around the site is negligible given the procedures that will be in place for accepting and controlling this waste on-site. All Sharps Waste arriving on-site will be accepted in enclosed, fully sealed bins. These bins will be rigid therefore eliminating the potential for the spill of waste during transportation or handling. Sharps waste arriving on-site will only be handled, processed and stored in designated areas inside the building. Sharps waste arising on-site will be stored in sealable containers on-site. This sharps waste will be removed from the premises as soon as practicable and, in any case, within 48 hours of arrival or within 72 hours at public holiday weekends, in accordance with relevant EPA BAT Guidelines. The bins themselves will not attract any vermin once they undergo the washing/sterilization process.

7. EIA Screening

7.1 Introduction

The EIA Directive 85/337/EEC, as amended aims to determine the likely significant effects of a project on the environment. Projects requiring mandatory EIA are listed in Schedule 5 of the Planning and Development Regulations 2001, as amended. In the case of development which is under these thresholds, planning authorities are required under Article 103 of the 2001 Regulations, (as amended) to request an EIAR where it considers that the proposed development is likely to have a significant effect on the environment. EIA Screening determines whether an EIA is required for a specified project, either because it is a class of activity listed in the Regulations that requires mandatory EIAR, or because it is a type of proposed development that is likely to have a significant effect on the environment.

7.2 Relevant EIA Legislation

EIA requirements derive from Council Directive 85/337/EEC (as amended by Directive 97/11/EC, 2003/35/EC and 2009/31/EC) and as codified and replaced by Directive 2001/92/EU of the European Parliament and the Council on the assessment of the effects of certain public and private projects on the environment (and as amended in turn by Directive 2014/52/EU).

7.3 Mandatory EIA

Section 172 of the Planning and Development Act 2000, as amended, provides the legislative basis for mandatory EIA. It states the following:

“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: (a) Proposed development of a class specified in Schedule 5 of the Planning and Development Regulations 2001 which exceeds a quantity, area or other limit specified in that Schedule, and (b) Proposed development of a class specified in Schedule 5 to the Planning and Development Regulations 2001 which does not exceed a quantity, area or other limit specific in that Schedule but which the planning authority or the Board determines would be likely to have significant effects on the environment”

Further to the above, Schedule 5 of the Planning and Development Regulations 2001, as amended sets out a number of classes and scales of development that require EIA. The closest class of development to the proposed development set out in Schedule 5 of the Regulations is as follows:

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

Having regard to the above, it was concluded that an EIA is not mandatory for the proposed waste transfer facility. The proposed waste transfer facility does not involve the disposal of waste and it is only proposed to accept a maximum of only 20 tonnes of waste material per annum.

7.4 Sub-threshold Assessment

Section 172 of the Planning and Development Act, 2000, as amended, also sets out the basis for EIA for developments which may not be of a scale included in Schedule 5 of the Planning and Development Regulations 2001, as amended. This allows a consenting authority to require EIA where it is of the opinion that the proposed development (although subthreshold) is likely to have significant effects on the environment and therefore should be subject to EIA. In this context, the consideration of 'significant effects' should not be determined by reference to size only and the nature and location of a project must also be taken into account.

As such, when carrying out an EIA Screening exercise to determine whether a proposed development is likely to have a significant effect on the environment, an appraisal of impacts from the proposed development according to three main criteria is required. These are as follows:

1. Characteristics of the project
2. Location of proposed project
3. Characteristics of potential impacts

Schedule 6 of the Planning and Development Regulations, 2001 (as amended), outlines the aspects of the environment likely to be significantly affected by a proposed development. These are: human beings, flora and fauna, soil and geology, water, air & climate, landscape, material assets, cultural heritage and the inter-relationships between the range of environmental criteria.

Schedule 7 of the Planning and Development Regulations, 2001 (as amended) defines criteria for determining whether Development in listed in Part 2 of Schedule 5 should be subject to an Environmental Impact Assessment. A Screening Exercise having regard to these criteria has been carried out and is shown in the table below.

Table 7-1 Screening Assessment to determine whether the Proposed Development should be subject to an EIA.

Characteristics of the Proposed Development	Comment
Could the scale of the proposed development be considered significant?	No. The Proposed Waste Activity would be deemed a small-scale waste activity.
Considered cumulatively with other adjacent proposed development, would the size of the proposed development be considered significant?	No. The Proposed Waste Activity would be deemed a small-scale waste activity.
Is the nature of the proposed development significant?	No. The proposal does not involve the carrying out of any sizeable construction works. The proposed waste activity is small scale in nature. The environmental risk associated with the proposed waste activity is negligible to very low.
Will the proposed development utilise a significant quantity of natural resources?	No. The proposed development will not utilize a significant amount of natural resources. The proposed development will promote resource efficiency.
Will the proposed works produce a significant quantity of waste?	No. Only small levels of waste will be generated on-site. This waste will be collected by an authorized company and dispatched to an authorized waste treatment facility.
Will the proposed works create a significant amount or type of pollution?	No. The Proposed Development will not result in the generation of a significant amount of pollution. There will be No emissions of significance associated with the proposed development. Emission and Environmental control and mitigation measures will be employed to ensure the proposed development does not result in the generation of significant environmental impacts.
Will the proposed works create a significant amount of nuisance?	No. The Proposed Development will not result in the generation of a significant amount of nuisance. Nuisance Control measures will be employed to ensure proposed development activities do not cause nuisance.
Will there be a risk of accidents, having regard to substances or technologies used?	No. The risk of accidents will be strictly controlled through the adoption of an Accident Prevention Policy and an Emergency Preparedness and Response Plan.
Would any combination of the above factors be considered likely to have significant effects on the environment?	No.
Location of Proposed Development	Comment
Have the proposed works the potential to impact directly or indirectly on any site designated for conservation interest (e.g. SAC, SPA, pNHA)?	No. There will be no emissions of significance associated with the proposed development. There will be no emissions to the environment that may have an impact upon hydrologically connected protected areas based in Dublin Bay. In addition, there are no protected areas within the zone of influence of the proposed development. The nearest protected area is 8.2 km east of the site.

Has the proposed development the potential to impact directly or indirectly on any habitats listed as Annex I in the EU Habitats Directive?	No. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
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. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex II in the EU Habitats Directive?	No. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex IV in the EU Habitats Directive?	No. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
Has the proposed development the potential to impact directly or indirectly on any species listed as Annex I of the EU Birds Directive?	No. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
Has the proposed development the potential to impact directly or indirectly on the breeding places of any species protected under the Wildlife Act?	No. There will be no emissions of significance associated with the proposed development. There are no areas of ecological importance within the zone of influence of the proposed development site.
Has the proposed development the potential to impact directly or indirectly on existing land use?	No. The proposed Development does not involve the carrying out of any sizeable construction works. The Proposed Development consists of a small scale and tightly controlled Waste Transfer Facility. As such, there will be no emissions of significance associated with the proposed development. There will be negligible changes in traffic levels in the local area due to the proposed development as it is expected that less than one commercial van load of waste bins will be brought to the site per day on average.
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 recorded monuments and places of archaeological interest in the vicinity of the proposed development 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 proposed development will have no impact upon landscape character. The proposed development does not involve the construction of any buildings or any alteration to the landscape.
Characteristics of Potential Impacts	Brief Assessment of Impacts
Population and Human Health	The Proposed Development will have a negligible impact upon Population and Human Health. The proposed waste activity is small-scale in nature and tightly controlled. Emissions and Environmental Control and Mitigation Measures

	have been developed to prevent the occurrence of significant environmental impacts and nuisance.
Biodiversity	The Proposed Development will have a Negligible Impact upon Biodiversity. There are no areas of ecological importance within the zone of influence of the site. There will be no emissions of significance associated with the proposed development.
Soils and Geology	The Proposed Development will not affect Soils and Geology. The Proposed Development does not involve the carrying out of any groundworks. The Proposed Development will not result in the generation of emissions to ground.
Water	The Proposed Development will not affect Waters. The Proposed Development does will not result in the generation of emissions to surface waters or groundwaters.
Air and Climate Change	The Proposed Development will not result in the generation of any emissions to air of significance.
Noise & Vibration	The Proposed Development will not result in the generation of any noise emissions of significance. There will not be any noise plant or machinery present on-site.
Landscape	The Proposed Development will not alter Landscape Character.
Material Assets	The Proposed Development will have a negligible impact upon Material Assets. The proposed waste activity is small-scale in nature and tightly controlled. Emissions and Environmental Control and Mitigation Measures have been developed to prevent the occurrence of significant environmental impacts and nuisance.
Cultural Heritage	The Proposed Development will not affect Cultural Heritage. There are no protected structures or recorded monuments and places of archaeological interest in the vicinity of the proposed development site. The Proposed Development does not involve any sizeable construction works, groundworks or land take.
Interaction of Foregoing	The Proposed Development does not result in the generation of significant environmental impacts due to the interaction of the foregoing
Discussion of Potential Impacts	Comment
Would a large geographical area be impacted as a result of the proposed development?	No. The proposed development is small scale in extent. There will be No environmental impacts or emissions of significance associated with the proposed development.
Would a large population of people be affected as a result of the proposed development?	No. The proposed development is small scale in extent. There will be No environmental impacts or emissions of significance associated with the proposed development.
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 proposed development is small scale in extent. There will be No environmental impacts or emissions of significance associated with the proposed development.
In considering the various aspects of the environment, would the impacts of the proposed development be considered complex?	No. There will be no environmental impacts or emissions of significance associated with the proposed development.
Is there a high probability that the effects will occur?	No. The proposed waste activity is tightly controlled. There is a negligible to very low likelihood the proposed development activities will result in any environmental impacts of significance.
Will the effects continue for a long time?	There will be no long-term adverse environmental effects as a result of the proposed development.
Will the effects be permanent rather than temporary?	There will be no permanent, adverse environmental impacts associated with the proposed development.
Will the impacts be irreversible?	There will be no irreversible, adverse environmental impacts associated with the proposed development.
Will it be difficult to avoid, or reduce or repair or compensate for the effects?	There will be no environmental impacts or emissions of significance associated with the proposed development.

7.5 Conclusions

An EIA Screening exercise was however carried out to determine the potential for the proposed project to have significant environmental impacts or not. This exercise has been informed by the Screening for Appropriate Assessment completed shown in Section 8. It has been concluded that the proposed development will not cause the occurrence of significant environmental impacts. The overall conclusion of this screening exercise is that there is no specific requirement for an Environmental Impact Assessment of the proposed project.

8. AA Screening

8.1 Introduction

HealthBeacon Limited propose establishing a small-scale Healthcare Waste Management Facility at their premises at Unit 18 Naas Road Business Park, Muirfield Drive, Naas Road, Dublin 12 (Eircode:D12 PF63). Screening for Appropriate Assessment has been carried out to identify whether or not the proposed development is likely to have significant adverse effects on a Natura 2000 Site designated under either the Habitats Directive (92/43/EEC) or the Birds Directive (2009/147/EC). Where Screening for Appropriate Assessment determines that effects on a designated site are likely, certain or unknown a full Appropriate Assessment (AA) / Natura Impact Statement (NIS) is required.

8.2 Overview of Appropriate Assessment Screening

Member States are required to designate Special Areas of Conservation (SACs) and Special Protected Areas (SPAs) under the EU Habitats and Birds Directives, respectively. SACs and SPAs are collectively known as Natura 2000 sites. An 'Appropriate Assessment' (AA) is a required assessment to determine the likelihood of significant impacts, based on best scientific knowledge, of any plans or projects on Natura 2000 sites. A screening for AA determines whether a plan or project, either alone or in combination with other plans and projects, is likely to have significant adverse effects on a Natura 2000 site in view of its conservation objectives.

The following Stage 1 AA Screening was undertaken in accordance with the Department of EC's *Methodological guidance on the provision of Article 6 (3) and (4) of the Habitats Directive 92/443/EEC* and NPWS's *Guidance on Appropriate Assessment for Planning Authorities*.

8.3 Stages of Appropriate Assessment

The AA process consists of four stages which are detailed below:

- Stage One: Screening
 - This stage involves the identification of the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether significant impacts upon a designated site are likely, certain or unknown.
- Stage Two: Appropriate Assessment/ Natura Impact Statement (NIS)
 - A full AA/NIA is required where the AA Screening determines that significant impacts on a designated site are likely, certain or unknown. This stage involves the consideration the project or plans impact on the integrity of the Natura 2000, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.
- Stage Three: Assessment of alternative solutions
 - This stage involves the examination alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

- Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain.
 - This stage involves the assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

8.4 Stage 1: AA Screening – General Steps for Completion

AA Screening comprises the first stage of the AA process and generally involves the following steps.

1. Determining whether the project or plan is directly connected with or necessary to the management of the site.
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 site.
3. Identifying the potential effects on the Natura 2000 site.
4. Assessing the significance of any effects on the Natura 2000 site and determining whether significant impacts upon a designated site are likely, certain or unknown.

8.5 Stage 1: AA Screening – Methodology in this instance

The following steps were taken to complete the AA Screening in this instance.

1. A review of site plans and proposals relating to the proposed development.
2. A desktop review of baseline environmental information for the site and surrounding environment available from the following sources:
 - a. OSI Aerial photography and mapping
 - b. NPWS Map Viewer
 - c. NPWS Protected Sites Data
 - d. EPA Envision Map Viewer
3. An evaluation of the potential impacts upon Natura 2000 sites in accordance with prescribed assessment criteria.

8.6 Identification and assessment of Potential Impacts upon Natura 2000 Sites

A description of the proposed development is described in Section 4. Layout Plans showing the design of the proposed facility adjoins this Planning Application (Drawing Ref: 02). A description of the receiving environment in which the proposed development is located is provided in Section 5. A description of emissions and environmental impacts associated with the proposed development as well as emission and environmental control and mitigation measures is provided in Section 6. The content of these sections were considered during the identification and assessment of potential impacts upon Natura 2000 sites associated with the proposed development.

As is already discussed, the site is not situated within or adjacent to any Natura 2000 site. There are no Natura 2000 sites situated within the zone of influence of the site. There are 5 SAC's and 3 SPA's situated within 15 km of the proposed development site. These are as follows:

- South Dublin Bay SAC
- North Dublin Bay SAC
- Glensamole Valley SAC
- Wicklow Mountains SAC
- Rye Water/Carton SAC
- South Dublin Bay and River Tolka SPA
- North Bull Island SPA
- Wicklow Mountains SPA

The closest Natura 2000 sites are located within Dublin Bay approximately 8.2 km to the east at their nearest point, and include a wide variety of inter-tidal marine and coastal zoned habitats supporting a range of species including Annex 1 habitat and bird species. There is a hydrological pathway from roof and hard-standing areas in Naas Road Business Park to these Natura 2000 sites. Surface water arising in these roof and hard-standing areas is directed by the business park drainage system to the River Camac which in turn is directed to the River Liffey which in turn flows into Dublin Bay where a number of Natura 2000 sites are situated. There are no other hydrological pathways between the site and Natura 2000 sites.

A screening assessment has been carried out in accordance with EU Guidance (EC, 2001) and using the standard screening assessment criteria and form provided in Annex 2 of the EU Guidance document. This screening assessment is shown in Table 8-1 below.

Implicit in the Habitats Directive is the application of the precautionary principal, which is used (i) where there is potential for negative effects and (ii) where due to inconclusive or insufficient data it is not possible to determine with sufficient certainty the risk in question.

Table 8-1 Screening Assessment Details

Assessment Criteria	Discussion
<p>Description of elements of the project likely to give rise to impacts on Natura 2000 sites.</p>	<p>It is not envisaged any element of the proposed development is likely to give rise to impacts upon Natura 2000 sites. The proposed development is not taking place on or adjacent to any Natura 2000 site. There are no Natura 2000 sites within the Zone of Influence of the proposed development. The nearest Natura 2000 sites are situated approximately 8.2 km to the east of the site in Dublin Bay.</p> <p>The proposed development site lies within a business park that has a drainage system which drains to the Camac which in turn drains to the Liffey and then into Dublin Bay where a number of protected areas are situated. The proposed development does not however involve the discharge of wastewater to ground, any surface water body, or foul or storm sewer. The small volumes of wastewater generated during wash processes on-site will be contained in a bunded IBC inside the building on-site prior to being collected by an authorized hazardous waste collector. There is therefore a negligible risk of wastewater from the process impacting upon Natura 2000 sites which are hydrologically connected to the business park's drainage system.</p> <p>Generally, there are no emissions of significance associated with the proposed development.</p>
<p>Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on Natura 2000 sites by virtue of: Size and scale;</p> <ul style="list-style-type: none"> • Land-take; • Distance from Natura 2000 Site or key features of the Site; • Resource requirements; • Emissions; • Excavation requirements; • Transportation requirements; • Duration of construction, operation etc.; and • Other. 	<p>The proposed development does not give rise to any likely effects upon any Natura 2000 site.</p> <p>There are no Natura 2000 sites within the Zone of Influence of the proposed development. The nearest Natura 2000 sites are situated approximately 8.2 km to the east of the site in Dublin Bay.</p> <p>There are no emissions of significance associated with the proposed development.</p> <p>The proposed development does not involve any sizeable construction, land-take or excavation.</p> <p>The proposed development does not involve the use of any natural resources associated with any Natura 2000 site.</p>
<p>Describe any likely changes to the site arising as a result of:</p> <ul style="list-style-type: none"> • Reduction of habitat area; • Disturbance of key species; • Habitat or species fragmentation; • Reduction in species density; • Changes in key indicators of conservation value; and • Climate change. 	<p>The proposed development does not give rise to any likely effects upon any Natura 2000 site.</p>

Assessment Criteria	Discussion
<p>Describe any likely impacts on the Natura 200 site as a whole in terms of:</p> <ul style="list-style-type: none"> • Interference with the Key relationships that define the structure of the site; and • Interference with key relationships that define the function of the site. 	<p>The proposed development does not give rise to any likely effects upon any Natura 2000 site.</p>
<p>Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale of magnitude of impacts is not known.</p>	<p>The proposed development does not give rise to any likely effects upon any Natura 2000 site. It is deemed the proposed development will have not a significant impact upon any Natura 2000 site.</p>

8.7 Conclusions

Having carried out an evaluation of the subject proposed development, the surrounding hydrological pathways and Natura 2000 sites within 15 km of the site, as well as having regard to the prescribed AA Screening assessment criteria, it can be objectively concluded that it is unlikely the proposed development or construction activities will have a significant impact on any other Natura 2000 site, either alone or in combination with other projects in the area. Given the nature of the proposed development, and given there will be no emissions of significance associated with the proposed and given general control measures that will be in place to prevent the accidental discharge of wastewater to the business park's drainage system, it is concluded that the proposed development will have no impact upon any Natura 2000 site.

As such, a Stage 2 Appropriate Assessment/ Natura Impact Statement is not required.

Appendix 1 SOP/Workflow for Proposed Facility Operations

SOP Overview - Process for Handling of HealthBeacon Sharps Bins in the Processing Room

· An SOP for the processing operation, covering waste collection/acceptance procedures, waste inspection upon arrival on-site, waste quarantine procedures, wash process procedures, sharps handling and storage procedures and onward dispatch procedures.

HealthBeacon Sharps Bin handling process

1. Waste acceptance and inspection process
2. Bin Identification Process
3. Lid Removal & Image capture Process
4. Bin & Lid Cleaning Process
5. Cleaned Bin Inspection & Validation process
6. Certification & Data logging Process

1. WASTE ACCEPTANCE AND INSPECTION

- a. Waste is received into unit 18 and brought to inspection area. Sharps boxes are brought into the processing room for further processing or stored in pre-process storage area.

2. BIN IDENTIFICATION PROCESS

- a. The operator should wear latex gloves while handling sharps bins.
- b. Move the sharps bin over the RFID reader to identify the tag number.
- c. Place the bin on the weighing scales and record the bin weight in the correct field.
- d. Remove label

3. LID REMOVAL & IMAGE CAPTURE PROCESS (NOTE: THIS PROCESS MAY CHANGE AS NEW REMOVAL DEVICE IS BEING DEVELOPED)

- a. The operator MUST wear appropriate needlestick & cut resistant gloves while undertaking this procedure. Latex protective gloves should also be worn during any handling of the sharp'/s container.
- b. Place the bin into the lid removal tool holder, ensure the blue lid handle is facing to outside towards the operator (see picture).
- c. Pull down on the lever slowly to ensure the tool head aligns with the bin lid to be removed.
- d. Increase the pressure by pulling downward on the lever to sever the blue lid corners, quickly raise the lever upwards to aid in the removal of the lid. The upwards motion performed in one quick movement can facilitate this removal more efficiently. Repeat until the front of the lid has visibly moved off the yellow container.
- e. Remove blue lid to appropriate recycling container or place into washing rack.

- f. Ensuring appropriate gloves are being worn the operator should place the “Safety Perspex Lid” over the open sharps container and gently remove the sharps bin from the holder and tip into the Transfer Chute.
- g. Move the empty bin to the washing rack for “Bin and Lid cleaning process”
- h. The sharps contents will move to the Image Capture Tray.
- i. The operator should record and image of the sharps bin contents and ensure it is paired with the correct RFID ID#

4. BIN & LID CLEANING PROCESS

- j. Wearing appropriate hand protection, the uncleaned sharps bins should be positioned face down into the washer basket according to “bin/lid positioning layout” below.
- k. Once the racks are full the anti-displacement grid should be placed on top.
- l. If lids are to be included in this washing programme then stack according “bin/lid positioning layout”
- m. The appropriate volume of detergent/disinfectant solution should be added to the washer (see HB washing/cleaning procedure for details).
- n. Turn on the machine and select the appropriate wash cycle as detailed in the HB washing/cleaning procedure.
- o. Close the door to start the programme.
- p. Complete the washing programme log (which identifies RFID# bins washed in that run)

5. CLEANED BIN INSPECTION & VALIDATION PROCESS

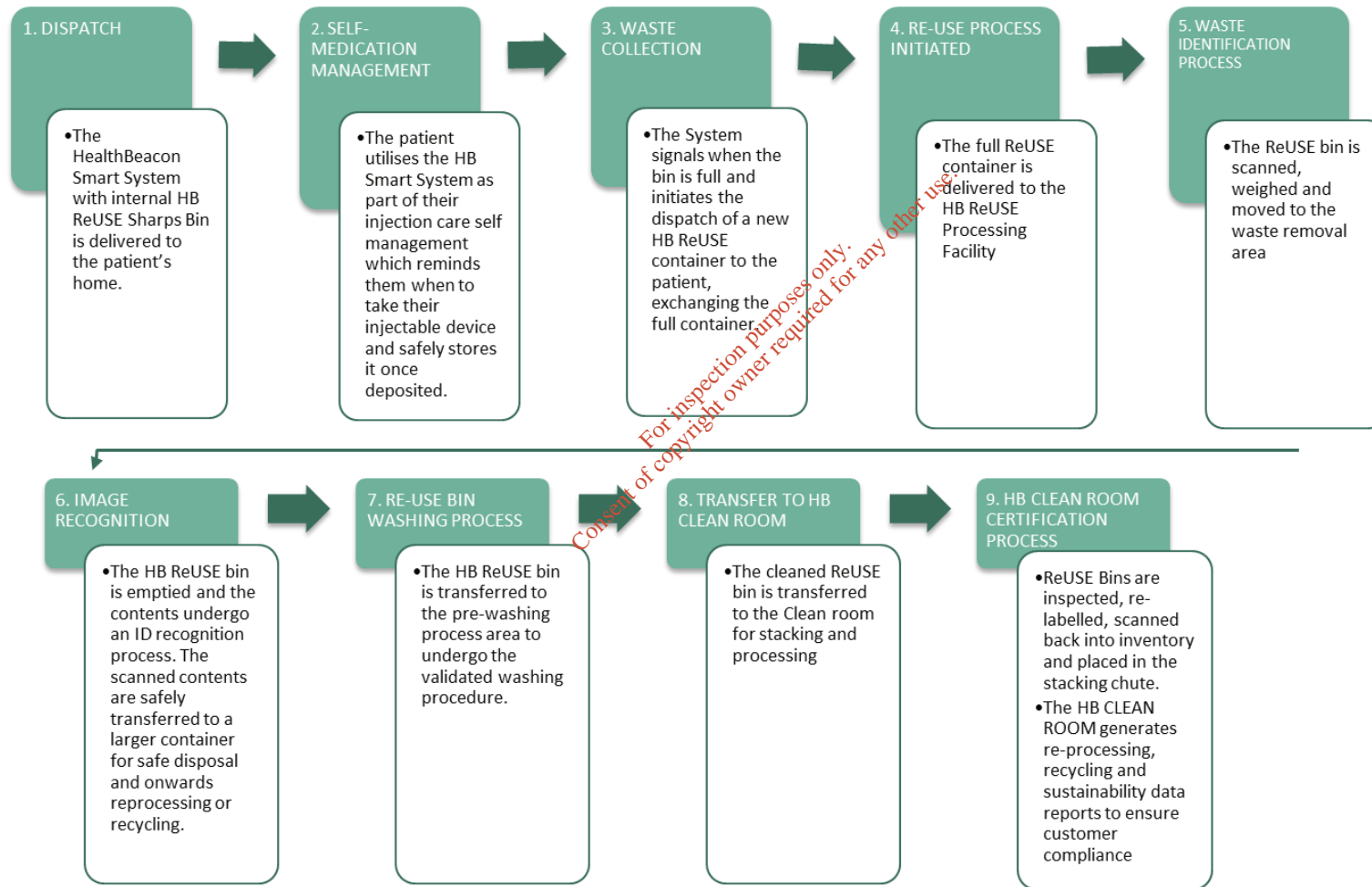
- q. Switch off the machine and unload the washed containers
- r. Move the washed bins to rollers for transport to the clean room.

6. Certification & Data logging Process

- s. Select a container from the top and bottom rack and perform the necessary swab procedure, for washing validation assay.
- t. Move bins to the wire shelves to complete drying process
- u. To return bins back into inventory, scan the RFID tag, place a new bin label on the front of the bin and scan the barcode to link to the same RFID tag.



HB ReUSE SHARPS CONTAINER WORKFLOW



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