



Objection

Objector:	Mr Robert Hunt
Organisation Name:	TOBIN Consulting Engineers
Objector Address:	Block 10-4 , Blanchardstown Coporate Park, Co. Dublin.
Objection Title:	Objection #OS010167 - Applicant objection for Reg No:[W0303-01]
Objection Reference No.:	OS010167
Objection Received:	08 December 2021
Objector Type:	Applicant
Oral Hearing Requested?	No

Application

Applicant:	Dublin City Council
Reg. No.:	W0303-01

See below for Objection details.

Attachments are displayed on the following page(s).



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Our Ref: 10243-L-01-010

8th December 2021

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000,
Johnstown Castle Estate,
Co. Wexford.
Y35 W821

Re: Submission of Objection to Proposed Decision in relation to Waste Licence for the Ballymun Recycling Centre, Ballymun, Dublin 11 (W0303-01)

Dear Sir/Madam,

TOBIN Consulting Engineers submitted a Waste Licence application to the Environmental Protection Agency (hereafter referred to as the Agency) in June 2019 in respect of a civic amenity facility at the new Dublin City Council (DCC) North City Operations Depot (NCOD) in Ballymun, Dublin 11.

The Agency issued a Proposed Decision on 12 November 2021 to grant a Waste Licence for the facility subject to conditions. On behalf of DCC, we hereby submit an objection to the following conditions as set out in the Proposed Decision and respectfully request the Agency to amend the licence conditions accordingly.

Condition 3.11 – Silt Traps and Oil Separators

Condition 3.11 requires that:

“The licensee shall, prior to the commencement of the activity, install and maintain silt traps and oil separators at the facility:

- (i) Silt traps to ensure that all storm water discharges, other than from roofs, from the facility pass through a silt trap in advance of discharge.*

As per the Drainage Layout (Drawing No. NCOD-TOB-ZZ-XX-DR-CE-6252 included in the Licence Application), there is an oil/fuel interceptor located close to the eastern boundary of the site, however it is not proposed to include silt traps on the stormwater drainage network at this location within the Ballymun Recycling Centre facility boundary.

Directors: M. Shelly (Chairman) C. McGovern (Managing Director) E. Connaughton (Company Secretary)
R.F. Tobin B.J. Downes D. Grehan M. McDonnell
B. Carroll S. Kelly S. Tinnelly

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Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway H91 AXK8. Ireland.

A silt trap will be installed on the stormwater drainage trunk main at the eastern end of the North City Operations Depot site prior to discharge into the public storm sewer at St. Margaret's Road (Manhole Ref. MHT15). All stormwater run-off from the BRC facility will pass through this silt trap.

The above information is provided for clarity in respect of Condition 3.11 and we request that the wording of Condition 3.11 be updated accordingly.

Condition 6.11 – Storm Water

Condition 6.11.1 specifies the requirement for a visual examination of stormwater discharges to be carried out daily. Schedule C.2.3 of the Licence specifies a weekly visual inspection of the stormwater discharge.

We consider that weekly visual inspection of the stormwater discharge is appropriate given the nature and risk of the activities at the site and we request the Agency to update Condition 6.11 accordingly.

We respectfully request the Agency to take the above objections/clarifications into consideration in the issuing of a Final Determination for the Ballymun Recycling Centre Waste Licence (W0303-01).

We are happy to discuss the above items with the Agency at any stage and look forward to a successful grant of Waste Licence for the facility.

Kind Regards,



Robert Hunt

Senior Project Manager

For and on behalf of TOBIN Consulting Engineers

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Cc: Ms. Sharon McMahon – Dublin City Council

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