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Waste Licence Application Non-Technical Summary

Application ID: LA005485

Environmental Consultancy Services

PRESENTED TO

Sancom Ltd
Materials Recovery Facility Licence Application

DATE

May 2024

Attachment 1-2

Non-Technical Summary

The summary should identify all environmental impacts of significance associated with the carrying on of the activity/activities and describe mitigation measures proposed or existing to address these impacts. This description should also indicate the normal operating hours and days per week of the activity.

The following information must be included in the non-technical summary:

- The relevant class or classes of activity in the First Schedule of the EPA Act 1992 as

  amended or Third and Fourth Schedule of the Waste Management Act 1996 as amended.

- Indication of whether EIAR/EIS and planning permission documents are included.

- Indicate relevant BAT guidance documents or BAT Conclusions decisions, where applicable. The title of the relevant BREF document, where applicable.

- Information on how the emission levels have been determined.

- Indication if EC (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2006 apply.

- If a derogation under Section 86A (6) is being sought and the specific reasons for such derogation.

  A description of:

- The installation/facility (plant, methods, processes, abatement, recovery and treatment systems and operating procedures for the activity), with emphasis on the main measures to avoid, reduce and, if possible, offset the major adverse effects on the environment.

- The raw and auxiliary materials, substances, preparations, fuels and energy which will be produced by or utilised in the activity.

- The sources of emissions from the installation.

- The environmental conditions of the site of the installation (e.g. soil and groundwater, air, noise, surface water) including reference to a Baseline Report where applicable.

- The nature and quantities of existing and proposed emissions from the installation into each medium as well as a summary of the assessment of the effects of the emissions on the environment as a whole.

- The proposed technology and other techniques to prevent or eliminate, or where this is not practicable, limit, reduce or abate emissions from the installation.

- Summary of the quantity and nature of wastes which may be produced or accepted at the installation.

- Measures to ensure that waste production is avoided in accordance with the waste hierarchy in Council Directive 98/2008/EC on waste and section 21A of the Waste Management Act 1996, as amended; where waste is generated, it is prepared for re-use, recycled or recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment (applicants should provide this information in the context of the Waste Management Act 1996, as amended).

- All the appropriate preventive measures are taken against pollution, in particular through application of the Best Available Techniques (BAT) or BAT Conclusions Decision where applicable.

- The necessary measures are to be taken under abnormal operating conditions, including start up, shutdown, leaks, malfunctions, breakdowns and momentary stoppages.

- The necessary measures to be taken on and following permanent cessation of activities to avoid any risk of environmental pollution and return the site of the activity to a satisfactory state or the state established in the baseline report if required.

- Measures planned to monitor emissions into the environment.

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1 INTRODUCTION

Sancom Ltd (hereinafter Sancom), operates a sand and gravel quarry at their site located in Graney West, Castledermot, Co Kildare.

This document serves as a Non-Technical Summary of the Waste Licence Application made by Sancom Ltd. to the Environmental Protection Agency (hereinafter referred to as *the EPA*)

It should be noted that a significant level of further detail on, inter alia, the proposed waste activity, receiving environment, potential environmental impacts and environment impact mitigation measures is provided in the Application Pack submitted to the EPA.

Sancom Ltd propose to progressively restore the extracted landform through the importation of a maximum of 1.8 million tonnes of soil and stone material onto the site for backfilling over the course of 25 years, depending on market demand for disposal services. This equates to a maximum of 72,000 tonnes of soil and stone material per annum over 25 years.

2 GENERAL INFORMATION

2.1 Planning Permission & Site History

Sancom Ltd were granted permission (Kildare County Council Planning reference 20/639) in 2021 for the development of a Materials Recovery Facility at their worked-out quarry site. Sancom subsequently lodged an appeal with An Bord Pleanála (ABP-310216-21) against certain conditions pertaining to the surface dressing requirements on the public roads in proximity to the development site.

An Bord Pleanála made a final decision in June 2023 which included some amendments to planning conditions and the removal of Condition 10 in its entirety which required the developer to resurface up to 9 km of the public road from Castledermot to the Kildare County border with Wicklow.

The site has been in use historically as a quarry facility. sancom Ltd registered the sand and Gravel pit in accordance with Section 261 of the Planning and Development act 2000. Permission for the continued operation of the sand and gravel pit and all associated processing works was obtained in 2009 (Planning Reference: 06/2802). The quarry is no longer in operation. A vernacular cottage and agricultural buildings are also present on the site.

Phoenix Sand Ltd applied for planning permission to develop a Materials Recovery Facility at the site (KCC Planning reference 18/196). This application was for the deposition of waste soils and stone at the quarry for the purposes of backfill and land restoration. The quantity to be accepted was less than 17,500 tonnes per annum with a lifetime operational capacity of 100,000tonnes. Kildare County Council issued a further information request and in response Stephan Hudziak, owner of both Phoenix Sand Ltd and Sancom Ltd, withdrew the application and lodged a new application on behalf of Sancom. This new application was lodged with a larger amount of soil and stones for importation and to address the items listed on Kildare County Councils Further information request.

The table below provides an overview of the Planning History for the subject site:

Table 1: Planning History

Planning Reference	Description	Decision	Date
06/2802	The continued operation for the extraction of sand & gravel and all associated works	Permission	02/06/2009
18/196	Development of a waste recovery facility	Withdrawn	27/06/2018

2.2 Site and Newspaper Notice

A site notice advising of the licence application was erected at the site entrance on the L-7003-1 County Road on the 13th of May 2024 and advertised in the Leinster Leader on the 14th of May 2024. A copy of the Newspaper Notice is provided within Attachment-6-7-2-Evidence of Notices-Newspaper

A copy of the Site Notice is provided within Attachment-6-7-1-Evidence of Notices-Site. along with photographic records of the site notice as erected. The location of the site notice is indicated in on Attachment-6-7-3-Evidence of Notices-Map.

The Planning Authority (Kildare County Council) has been advised of this licence application, for which, evidence of this is provided within Attachment-6-7-4-Evidence of Notices-PA.

2.3 Activities to be licensed.

Sancom Ltd is applying to the Environmental Protection Agency (EPA) for a Waste Licence for the recovery of 1.8 million tonnes of Inert soil and stone for the restoration of the original landform topography of the site. The progressive backfilling of the quarry void using inert soil and stone will include the following classes of waste activity in accordance with the Fourth Schedule of the Waste Management Act of 1996 as amended.

The principal activity will involve the use of imported, uncontaminated soil and stone, sourced from construction and demolition sites, to backfill and restore the worked-out quarry.

In addition to the principal waste activity described above, it is proposed to carry out the following secondary waste recovery activities:

- Intake of topsoil, screening at existing screening plant and resale of such material,
- Intake of gravel and sands for washing at the existing washing plant and resale of such materials,
- Intake of concrete, and crushing of concrete onsite using concrete crushing equipment, mixing with sand and gravel before being fed to the washing plant to form aggregate, and resale of such material, and;
- Intake of garden waste (green waste), shredding and composting of this waste within a silage pit over an underground effluent storage tank, for use for agricultural land spreading.

The maximum annual quantity of waste to be accepted to the facility will be 99,500 tonnes per annum. Only non-hazardous materials will be accepted onsite.

Note: A significant alteration to the proposed development was made at Further Information stage with Kildare County Council. The original planning application submitted to Kildare County Council was for the proposed acceptance of 387,000 tonnes to waste material onsite per year. Following discussions with the Planning Authority. The applicant reduced the amount of waste material accepted to the site to 99,500 tonnes per year.

All assessment documents submitted as part of this licence application are reflective of the latest proposed figures for waste acceptance per annum and over the lifetime of the project with the exception of the Attachments 6-1-2 and 6-1-3 (Appropriate Assessment Screening and Natura Impact Assessment documents respectively). These assessments still refer to and assess the higher waste acceptance figures originally proposed. The figures contained in these assessment documents are now no longer valid or correct. As such, it can be seen the mentioned assessments assess a 'Worse Case Scenario'. Notwithstanding this, it is considered that the vast majority of the content and all conclusions reached in these assessments remain appropriate, proper and valid (in particular the conclusion in the NIA that 'No adverse effects are likely' on any protected site provided that defined mitigation measures are implemented.

3 DESCRIPTION OF THE WASTE ACTIVITY

The Site Layout Plan adjoining this application (Attachment 3.2.18) depicts the proposed layout of the site and the proposed waste activity.

Waste materials will be brought on-site on HGVs via the proposed site access road which links the L4501 road to the site. Waste Acceptance Procedures will be in place to ensure unauthorized wastes are not accepted on-site. Waste materials will be brought via an internal haul road to a stockpiling and sorting area situated to the east of the site. Here, waste materials will be inspected and separated into the following waste streams using mobile machinery:

- Sub-soil and overburden (LoW Code 17 05 04)
- Topsoil (LoW Code 17 05 04)
- Sand and Gravel (LoW Code 17 05 04)
- Concrete (LoW Code 17 01 01)
- Biodegradable waste (Green waste) (LoW Code 20 02 01)

Sub-soil and overburden material will then be brought via internal haul routes to the proposed fill area for backfilling.

Sand and Gravel will be brought to an adjacent sand and gravel stockpiling area for storage prior to processing at an adjacent, pre-existing sand and gravel wash plant.

Top-soil will be directed to the soil screening plant situated adjacent to the stockpiling and sorting area for processing.

Concrete will be directed to the concrete jaw crusher plant situated adjacent to the stockpiling and sorting area for processing prior to being mixed with sand and gravel before being fed to the washing plant to form aggregate.

Biodegradable garden waste will be directed to a hard standing concrete area to the north of the site where it will await processing in a green waste shredder proposed to be situated in this area, prior to being dispatched for storage and decomposition at a hardstanding, impervious, hard-standing composting area situated adjacent to the shredder.

It is expected that material outputs will equate to waste material inputs for each of the above processing activities. It is expected there will be a negligible quantity of residual waste generated when carrying out any of the above waste activities.

Haulage routes for goods in, goods processed, and goods out are displayed in Site Layout Plans (DWGS 002C1-C4).

3.1 Site Infrastructure

The following Site Infrastructure will be provided on-site.

- Site Access/Entrance
- Traffic Management Infrastructure
- Site Roads, Parking and Hardstanding Areas
- Weighbridge
- Wheelwash
- Stockpile and Sorting Area
- Fuel and Oil Storage Area
- Material Recovery Infrastructure/Plant
- Waste Inspection and Quarantine Area
- Equipment Storage Area
- Wastewater and Surface Water Management infrastructure (Septic Tank, Settlement Ponds, Oil Interceptors, Silt Traps).
- Site Offices
- Site Services
- External Lighting

3.2 Management of the Site

The facility will employ between 2 and 5 people depending on demand. A designated Site Manager will have responsibility for directing incoming vehicles to relevant HGV queuing areas and material deposition areas. This Site Manager will also be responsible for directing and managing on-site staff to carry out their material handling, backfilling and processing related duties.

An Environmental Management System will be operated for the facility.

An Emergency Preparedness Procedure and a Closure Plan have been developed for the facility.

3.3 Hours of Operation

The site operating hours will be between 07:00 - 18:00 Monday to Friday and 08:00 - 16:00 Saturday. No activity will take place outside these hours.

3.4 The Raw and Auxiliary Materials, Substances, Preparations, Fuels and Energy which will be produced by or utilized in the activity.

The table below outlines the substances stored on site which will be utilized during the carrying out of the proposed activity.

Table 2: Fuel/Materials storage onsite

Fuels	Capacity (litres)	Storage facilities on site
White diesel tank	5,000	Covered, bunded storage area
Agricultural Diesel tank	5,000	Covered, bunded storage area
Hydraulic oil	20	Sump Pallet in Farm Store
Engine oil	20	Sump Pallet in Farm Store
3 x grades of oil	20 (x 3)	Sump Pallet in Farm Store

4 EXISTING ENVIRONMENTAL CONDITIONS

4.1 Geology

The study area for the Soils and Geology assessment includes the proposed inert waste recovery facility, the existing site layout and the immediate surrounding area within approximately 1km of the site boundary.

The natural sand and gravel material has been extracted at the site previously and there is a former settlement pond in the central and southern regions of the site. The historical extraction at the site was a tied land use activity, being dependant on the available reserves of Sand & Gravel material. The land use at the site comprises a former worked out sand and gravel pit, settlement ponds and agricultural sheds and a fuel storage facility.

The site is underlain by gravels derived from limestone which extend to the west, north and the east and a narrow band of alluvium along the southwestern site boundary (in the area of the settlement lagoons) which is separate from the river Graney alluvium. Other sediments in the area include Tills derived from limestone and granites and the alluvium along the route of the river Graney. There are no bedrock exposures at the site.

The bedrock geology beneath the site is mapped as Tullow Type 2 Granite, a microcline porphyritic granite with microcline phenocrysts. The depth to granite bedrock was recorded at the site ranging between 9.15 and 12.3m during the drilling of deep groundwater boreholes on-site in 2019. There are no sites designated County Geological Status within, or immediately adjacent to, the proposed development at Castledermot.

In terms of land, soils and geology baseline considered here the sensitive receptors are both land and soils, which are both of agricultural value and there is a potential impact on these. There will be no impact on subsoils or the bedrock geology.

With the restoration of the site to agriculture landuse the long term or residual impact, on the loss of agricultural land is considered to be low. The recovery of the inert waste material at the site and the restoration of the former landform will facilitate the restoration of soils across the site and the beneficial landuse in terms of agriculture and ecological habitats. Therefore, the residual impact of the proposed recovery facility will be both positive and beneficial for the land.

4.2 Surface Water and Groundwater

This section provides a description of the existing hydrological (surface water) and hydrogeological (groundwater) setting at the regional and local scale, and an assessment of the impact of the proposed development on surface water and groundwater.

Rainfall across the site percolates naturally to the ground and there is limited discharge of water from the site to any surface water course. The vast majority of storm runoff from the placed inert material will infiltrate naturally to the ground.

There is no public water supply to the site. The water requirement for site activities would be mainly for the washing of sand and gravels. Water for these purposes would be sourced from a groundwater abstraction point and a reuse of water from the settlement lagoons on-site.

If any imported waste is, or is suspected of being, non-compliant with the waste acceptance criteria then the material will be taken to a quarantine facility for examination and/or testing. The quarantine waste inspection facility comprises an existing covered shed over a sealed concrete slab; material in the shed will not come into contact with incident rainfall. And therefore, there will be no runoff from it.

Four (4 no.) Shell and Auger boreholes were drilled and installed as groundwater monitoring wells in 2017 around the perimeter of the site to a depth. The ground conditions were reported to comprise firm brown sandy gravelly clay overlying fine sand and dense medium gravels with large cobbles. The borehole logs did not record any groundwater strikes during drilling operations.

The scope of this section of the report includes an assessment of the existing surface water and groundwater conditions within the overall site, an assessment of the potential impact that the proposed development in the application area could have on surface water and groundwater and proposes any mitigation measures.

The site is located in within the River Barrow catchment, located in the Southeastern River Basin District. The river Graney flows to the south of the site from east to west within 100m of the southern site at its closest point. The river Graney is a stream which rises near Knockpatrick Hill and Corballis Hill and flows into the River Lerr at Castledermot. The River Graney and the River Lerr are tributaries of the River Barrow.

The site is located overlying the New Ross Groundwater Body (GWB) which is comprised of both moderately productive and unproductive aquifers. The site is underlain by granite bedrock, classified as a poor aquifer which is generally unproductive except for local zones (Pl).

Groundwater vulnerability maps indicate that the groundwater vulnerability beneath the overall site is classified as being High (H), with a significant thickness (>3m) of unsaturated sand and gravel material above the groundwater table.

Groundwater levels recorded in July 2007 within the shallow monitoring wells BH1 to BH4 indicate that groundwater is flowing in westerly direction across the site towards the Graney River and following the topographical relief of the area.

There are no source protection areas or public water supply (PWS) schemes within 3km of the site.

Groundwater quality results from three wells indicate that the groundwater is generally of good quality with levels generally below the relevant groundwater quality threshold values, except for Nitrate, Ammoniacal Nitrogen and hydrocarbons. The Nitrate and Ammoniacal Nitrogen levels were primarily recorded in upgradient wells and are attributed to surrounding agricultural activities to the site. The positive, albeit at relatively minor levels, of hydrocarbons detected in GW2 is potentially attributed to the historical fuel storage and refuelling activities on the site, located upgradient of this well.

Proposed discharges to surface water from a dedicated settlement pond will be temporary only and will only occur during periods of sustained and elevated rainfall events. Water within these ponds will be recycled within the washing plant to minimise the abstraction of groundwater and any overflows to surface water from the ponds. It is envisaged that as the site is infilled over time, the settlement ponds will be infilled there increasing ground levels in the area and reducing the requirement for settlement ponds with overflows to the river.

The proposed infilling operations will be above the groundwater level; the infilling will increase the thickness of unsaturated material above the water table at the site and this is considered positive as it offers the groundwater beneath the site additional protection.

There is no dewatering associated with the proposed development and therefore there will be no impact on groundwater quantity.

The proposed restoration will use inert material only. However, in the event of the unintentional importation of non-inert material there is the potential to impact on groundwater quality.

Mitigation measures are proposed to protect groundwater quality. With these mitigation measures in place, it has been assessed that there will be no residual negative impacts on the receiving water environment.

A programme of groundwater level, surface water and groundwater quality monitoring are proposed at the site.

4.3 Air

An Air and Climate Impact Assessment was undertaken for the Proposed Activity. This assessment describes and characterizes the existing air environment in the vicinity of the application site and assesses the impact proposed waste activities will have upon the receiving air environment. Proposed waste activities will have the potential to generate fugitive dust emissions which may impact upon local air quality and nearby sensitive receptors. As such, this assessment primarily addresses potential dust related impacts associated with the proposed activity.

The site is situated in rural location dominated by agriculture and interspersed with one off housing. There are a small number of residential developments in the vicinity of the site, mainly to the east, north and south of the application site.

Generally, low levels of air pollutants (PM10, PM2.5, NO2, SO2, Co, O3) have been recorded at EPA Monitoring Stations in the region. This is to be expected in a region that is predominantly rural in nature. Baseline Dust Monitoring using the Bergerhoff method was carried out at the application site over the month of May 2019 going into June 2019. Dust monitoring took place at three site boundary locations around the application site. Baseline dust levels recorded at the site were relatively low. The results of the dust monitoring undertaken are presented in the table below.

Table 3 Dust Monitoring Results

Location	Start Monitoring	End Monitoring	Date Analysed	Results (mg/m2/day)
D1	01/05/2019	06/06/2019	14/06/2019	0.7
D2	01/05/2019	06/06/2019	14/06/2019	60.4
D3	*01/05/2019*	*06/06/2019*	*14/06/2019*	*41*

Note: The EPA Conventional Limit for Dustfall is 350 mg/m2/day.

Given the small-scale magnitude of construction activities and the temporary nature of the site preparation works phase and given the low number of receptors in proximity to the site, the distance these receptors are away from the site and the generally the low sensitivity of the local area, it is anticipated that construction dust and emission impacts will be negligible.

A total of 12 dust sensitive receptors within 500 metres of the site have been identified. A Dust Impact Assessment was carried out considering the Operational Phase of the Proposed Waste Activity in accordance with *Guidance on the Assessment of Mineral Dust Impacts for Planning* (May 2016 (v1.1)) which has been prepared by the Institute of Air Quality Management (IAQM). A qualitative risk-based approach using the Source-Pathway-Receptor concept defined in the Guidance Document has been adopted. Generally, there is a negligible to low risk the proposed activity may adversely affect sensitive receptors surrounding the site, given the proximity of sensitive receptors to dust generating activities.

The Dust Impact Assessment concluded however that a number of receptors in the receiving environment are likely to be subject to slight adverse dust effects as a result of dust generating activities on site. It is important to note however that this assessment does not take into account proposed mitigation measures.

Mitigation Measures have been developed in order to reduce the potential impact of dust upon the closest receptors. These are as follows:

- Tall trees will be planted along the northern, eastern and southwestern boundaries of the site prior to the commencement of the development in order to minimize dust impacts on the nearest sensitive receptors to the site (Receptors B, E & F). The presence of these trees will also serve to minimize the generation of wind-blown dust on-site. These trees will be maintained at a height of 14 metres. Tall trees planted at the northern and eastern perimeters of the fill area will be placed on 2-metre-high screening mounds. Existing vegetation along the western boundary of the site will also be retained. These trees will remain in place for the duration of the operational phase and will remain a part of the restored site as semi-mature trees.
- Dusty plant, namely the Soil Screening Plant and Concrete Crushing Plant, will be situated towards the centre of the site and a good distance away from the site

boundary. This will ensure that there is a significant separation distance between dusty plant and sensitive receptors off-site. The aforementioned plant will also be situated in a sheltered location behind stockpiles in order to minimize the potential for wind-blown dust affecting off-site receptors.

- The following good housekeeping measures will be employed to minimize the generation of dust and dust impacts on sensitive receptors.
- All waste collected and accepted on-site, and all materials being transported off-site will be in sealed or covered vehicles only to prevent dust emissions on local roads and internally on-site associated with dustfall from waste contained on vehicles.
- Road sweeping will be carried out to ensure the access road to the site and internal haul roads are kept clean from dusty materials.
- Water spraying using water bowsers will take place on haul roads and stockpiles during dry and windy days to dampen dust and prevent airborne dust generation.
- A speed limit of 10 kph will be strictly enforced on-site to prevent the turning up of dust associated with traffic movements on-site.
- Long term exposed surfaces e.g. topsoil and overburden storage mounds will be vegetated/planted to reduce dust emissions.
- Soil handling will be minimized during adverse weather.
- The timing of operations will be optimized having regard to meteorological conditions.
- Imported soil will be compacted in-situ immediately after being unloaded to minimize wind- blown dust.
- Drop heights will be minimized to minimize dust generation.
- Site access roads and internal haul routes will be regularly re-gravelled in order to prevent deterioration of road conditions and consequent dust generation due to traffic movement.
- Plant operatives will avoid working in windy locations insofar as practicable. Operations will be carried out primarily in more sheltered locations.
- Training on dust mitigation measures will be provided to plant operatives. Plant operatives will be made aware of the nearest sensitive receptors to the site and the good housekeeping practices that should be implemented to prevent dust impacting upon these receptors.
- The slopes and the crest of the fill areas will be reseeded on a phased basis as the project progresses in order to bind the soil and prevent dust blow off.

It is proposed to carry out Bergerhoff dust monitoring at the three dust monitoring locations situated at the site boundary on a monthly basis. Dust monitoring results will be compared with the EPA's conventional limit value of 350 mg/m2/day in order to ensure dust is not having a negative effect on any off-site receptor.

With the adoption of the above mitigation measures is deemed that dust generating activities associated with the proposed development will not have a significant impact upon sensitive receptors in the baseline environment.

It is deemed that there will be no significant climate or odour impacts associated with the proposed Waste activity.

4.4 Noise

A Noise Impact Assessment to determine the impact proposed operations associated with the waste activity would have on the surrounding noise environment, and in particular, sensitive receptors surrounding the site was undertaken.

The site is situated in rural location dominated by agriculture and interspersed with one off housing. There are a small number of residential developments in the vicinity of the site, mainly to the east, north and south of the application site. These receptors are considered to be Noise Sensitive Locations (NSL's).

There are a number of noise sensitive locations in the vicinity of the site. Noise sensitive locations within 500 metres of the site have been identified. The prediction of noise impacts associated with the proposed activities on three NSL's which are in the closest proximity to the site in varying cardinal directions has been carried out.

A Baseline Noise Survey took place on the 25th of August 2019 in order to assess current noise levels in the locality at each identified NSL. Noise monitoring runs took place during the morning, midday and evening. Noise Monitoring took place at one monitoring location labelled as NSL1. It can be assumed that the noise measurement readings at this location would be closely similar for all the closest NSL's in the vicinity of the site in each cardinal direction given the rural nature of the site. The figure below shows the location of each NSL considered relative to the site (NSL1, 2 & 3).

Figure 1: Noise Sensitive Locations

Given that proposed site preparation works will be small-scale and limited in nature, scale and duration, it is envisaged that there will be Not Significant to Slight, temporary noise impacts upon the character of the local area and nearby NSL's surrounding the site during this stage of the development. The following Mitigation Measures will be adopted during site preparation works in order to reduce noise associated with this phase of the proposed activity:

- Construction operating hours shall be between 7am to 6pm Monday to Friday, and from 8am to 2pm on Saturdays. No construction activities shall take place outside of these operating hours.
- At the commencement of works all site staff are to be briefed on their responsibilities to the application of mitigation measures to minimise construction noise and the content of any planning permission.
- Brief all site staff regarding the complaint's procedure and mitigation requirements and their responsibilities to register and escalate complaints received.
- Display contact details of responsible site manager as well as working hours and other site information at both site entrances.
- Limit material loading and unloading to normal working hours.
- Reduce loading / unloading heights for muck away and material movement to mitigate impact noise.
- Ensure that each item of plant and equipment complies with the noise limits quoted in the relevant European Commission Directive 2000/14/EC.

- Fit all plant and equipment with appropriate mufflers or silencers of the type recommended by the manufacturer.
- Follow manufacturer's guidance and measures to operate plant and equipment and use it in a manner which minimises noise.
- Use all plant and equipment only for tasks for which it has been designed for.
- Shut down all plant and equipment in intermittent use in the intervening periods between works or throttle it down to a minimum.
- Locate and orientate fixed or semi-static plant away from noise sensitive receptors.
- Consider concrete pour sizes and plan the start of concrete pours as early as possible within normal working hours to avoid overruns.

A Noise Prediction Modelling Assessment was conducted to assess the noise impact operational phase activities will have at Noise Sensitive Locations (NSL's) in the vicinity of the site. This modelling assessment assumed a worst-case scenario (I.e. all plant operating at the same time at a point at the site boundary which is closest to each NSL)

The following noise sources will be present on-site during the operational phase of the Proposed Facility.

- Fixed plant used for processing C&D Waste material.
- Mobile Plant used for hauling and backfilling material on-site.
- Heavy Good Vehicles used for hauling materials to and from the site.

Noise Prediction modelling has determined that the assumed worst-case noise scenario will have a negligible impact on NSL1, NSL2 & NSL3 during all time periods.

Ambient Noise levels predicted at NSL's do not breach the EPA's prescribed day-time noise limit of 55 dB at any NSL (the facility does not operate during evening or night-time as defined by the EPA).

Mitigation measures for controlling and attenuating noise emanating from the site during operations are defined below. It is considered that the adoption and implementation of these mitigation measures will ensure noise will be controlled and maintained at an acceptable level.

The primary Mitigation Measures that will be implemented during the operational phase of the proposed waste activity to attenuate noise emissions emanating from plant, equipment and processes on-site are as follows:

- Site operations will be restricted to between 07:00 - 18:00 Monday to Friday and 08:00 - 16:00 Saturday. No activity will take place outside these hours. The facility will operate under an EPA Waste Licence which will prescribe noise limit values to adhere to.
- A 2-metre-high screening mound will be developed along the northern, eastern and southern site boundaries in order to attenuate noise emissions emanating from on-site plant and processes. These mounds will attenuate noise being directed from onsite activities toward NSL1 & NSL2 in particular.

- The Soil and Stone Screening Plant will be situated behind a 7-metre-high proposed material stockpile. The presence of this stockpile will serve to impede and attenuate noise emanating from the Soil and Stone Screening Plant toward NSL1 and NSL2 in particular.
- The proposed Concrete Crusher will be located behind a 7-metre-high proposed material stockpile. The presence of this stockpile will serve to impede and attenuate noise emanating from the Concrete Crushing Plant toward NSL1 & NSL2 in particular. The concrete crushing plant will be further enclosed by cantilever walls to minimize noise emanating from the operation of this plant.

In addition to the above, the following good practice mitigation measures for noise control on-site during the operational phase will be adopted and implemented in order to ensure operational phase noise levels are kept at an acceptable level:

- Chutes and hoppers will be lined with a damping layer (rubber lining) to minimize noise output from plant, where practicable. Manufacturers will be consulted in order to determine whether this is practicable.
- Drop heights will be kept to a minimum to minimize noise arising due to material handling.
- Plant and equipment will be serviced and maintained regularly and in line with manufacturer specification (e.g. lubrication of equipment, fixing loose parts, proper balancing)
- Silencers will be used on engines present on-site, where practicable. Manufacturers will be consulted in order to determine whether this is practicable.
- The unnecessary revving of engines and the idling of mobile plant and HGV's will be avoided.
- Backfilling and C&D Processing activities will only take place during the designated day-time operating hours (07:00 - 18:00 Monday to Friday and 08:00 - 16:00 Saturday).
- Plant will be orientated in such a manner that noise is directed away from NSL's, in particular NSL1 and NSL2 which are nearest to the site.

It is proposed to carry out day-time Environmental Noise Monitoring at NSL1, NSL2 and NSL3 during the operational phase of the proposed waste activity on an annual basis to ensure the EPA prescribed day-time noise limits for mineral sites is not breached at these NSL's.

With the adoption of the above Mitigation Measures, it is deemed that noise impacts upon NSL's as a result of Proposed waste activities will be negligible.

5 PREVENTATIVE MEASURES IN ACCORDANCE WITH BAT

The applicant is required to ensure conformance with Best Available Techniques for preventing or minimising emissions and impacts on the environmental for the Waste Sector (Transfer and Materials Recovery). Measures taken by the applicant to prevent pollution and

conform to prescribed relevant BAT requirements are detailed in Section 4.7 of this Waste Licence application.

6 MEASURES – ABNORMAL OPERATING CONDITIONS

The applicant is required to ensure conformance with Best Available Techniques for preventing or minimising emissions and impacts on the environment for the Waste Sector (Transfer and Materials Recovery) (Dec 2011). Measures taken by the applicant to prevent pollution and conform to prescribed relevant BAT requirements are detailed in Section 4.7 of this IE Licence Review Application.

7 RISK MANAGEMENT AND LIABILITY

An Environmental Management System (EMS is in place at the facility as per existing licence conditions.

Quality control procedures will be in place to check and verify all materials recovered onsite are acceptable. The importation of materials for recovery, processing and recycling is subject to feedstock acceptance procedures and contract and procurement procedures that ensure that all materials imported to the site are coming from a known source which has previously been inspected at the source location and approved for transport to the subject site. All materials imported to the site for recovery are inspected on delivery and prior to unloading / placement on the site. Any unsuitable materials are removed from the site in accordance with all legislative requirements.

8 FACILITY CLOSURE

A detailed Closure Plan (non-costed) has been submitted as part of this application. This Closure Plan identifies and plans for closure tasks and residuals management (i.e. known environmental liabilities) at the time of facility closure and decommissioning and aims to ensure that the necessary measures are taken to avoid any risk of environmental pollution and return the site of the activity to a satisfactory state or the state established in the baseline report if required

9 ALTERNATIVES

. In summary, once the need for a facility was identified the Applicant examined a number of options. There were three main alternatives considered in terms of the Proposed Development. These options were as follows.

1. Deposition of waste soil and stone at a quarry void for the purposes of backfilling and land restoration with a maximum acceptance of less than 17,500 tonnes per annum, and, overall, was expected to be approximately 100,000 tonnes throughout the operational phase of the proposed activity.

2. Pursue the existing site entrance connecting the local road to the site as opposed to selecting an entirely new site access road.

3. Consideration was given to the orientation and configuration of the internal plant layout and drainage systems, quarantine areas car parking etc.

A full discussion of alternatives is available in EIAR which is found in Attachment 6-1-4 of this application.

10 CONCLUSIONS

This non-technical summary includes a brief overview of the licence application for Sancom Ltd, Licence Application number LA005485.

An EIAR was completed and found that there will be no significant adverse impacts as a result of the proposed development.

It should be noted that to obtain a comprehensive detailed description of the facility and the activities that are proposed, the full application should be viewed online at the EPA's website and the associated Environmental Impact Assessment Report (EIAR) which is contained within Section 6 of the EPA licence application (Attachment 6-1-4).

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