

**Subject:** FW: Your ref: ABP-319506-24 – Modifications to existing Waste Treatment Facility to manage Healthcare Risk Waste  
**Attachments:** IE000113\_Enva - ABP Consultation EPA SDCC - F01.pdf

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**From:** Lauren Griffin  
**Sent:** Wednesday 6 November 2024 11:53  
**To:** McGovern, Conor <[Conor.Mcgovern@rps.tetrattech.com](mailto:Conor.Mcgovern@rps.tetrattech.com)>  
**Subject:** FW: Your ref: ABP-319506-24 – Modifications to existing Waste Treatment Facility to manage Healthcare Risk Waste

A Chara,

The Board acknowledges receipt of your email, the contents are noted.

Kind regards,

Lauren

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**From:** McGovern, Conor <[Conor.Mcgovern@rps.tetrattech.com](mailto:Conor.Mcgovern@rps.tetrattech.com)>  
**Sent:** Wednesday 6 November 2024 11:31  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Cc:** Kevin McCarthy <[kevin.mccarthy@enva.com](mailto:kevin.mccarthy@enva.com)>; Enda Cahalan <[enda.cahalan@enva.com](mailto:enda.cahalan@enva.com)>; Chadwick, Paul <[Paul.Chadwick@rps.tetrattech.com](mailto:Paul.Chadwick@rps.tetrattech.com)>  
**Subject:** Re: Your ref: ABP-319506-24 – Modifications to existing Waste Treatment Facility to manage Healthcare Risk Waste

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Dear Ms Griffin,

Please find attached the Enva response to the 17/10/2024 invitation to comment on submissions from EPA and South Dublin County Council on case ABP-319506-24. I would appreciate if you would confirm receipt of this response.

Regards,  
Conor McGovern

**Conor McGovern**  
Associate, Resource Management  
RPS | Consulting UK & Ireland  
West Pier Business Campus  
Dun Laoghaire, Co. Dublin A96 N6T7, Ireland  
**T** +353 1 488 2900 **M** +353 86 821 3839  
**E** [conor.mcgovern@rps.tetrattech.com](mailto:conor.mcgovern@rps.tetrattech.com)



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**Our ref: IE000113 – Enva**

Date: 04 November 2024

West Pier Business Campus  
Dun Laoghaire, Co. Dublin  
A96 N6T7  
T +353 1 488 2900

Ms. Lauren Griffin,  
SID Section,  
An Bord Pleanála,  
64 Marlborough St,  
Rotunda,  
Dublin 1, D01 V902  
Issued by email to: laps@pleanala.ie

**Re: Your ref: ABP-319506-24 – Modifications to existing Waste Treatment Facility to manage 24,000 tonnes of Healthcare Risk Waste, 402 Grants Drive, Greenogue Business Park, Rathcoole, Co. Dublin,**

Dear Ms. Griffin,

Please find below Enva commentary on the EPA and SDCC commentary upon which Enva was invited to comment on 17 October 2024.

**EPA: various statements.**

**Enva Response:** No commentary from Enva on items raised by EPA.

**SDCC: Strategic Summary of Issues and Section A: Context**

Enva Response: No commentary from Enva on these items.

**SDCC Sustainable Transport:**

- **Applicant to provide a Stage 1&2 Road Safety Audit that includes all pedestrian and cyclist movements within the yard.**
- **Applicant to submit a revised layout that meets the requirements of SDCCCDP:**
  - **Mobility impaired driver parking quantum - Minimum 5% MID**
  - **EV charging quantum - Minimum 20% EV**
- **Applicant to submit swept path analysis showing how trailers would be safely reversed/parked in the proposed trailers building are available.**

**Enva Response:**

1. No objection to requirement to provide a Stage 1&2 Road Safety Audit as part of a planning condition.
2. No objection to provision of a revised layout that meets the requirements of SDCCCDP as part of a planning condition.
3. Swept path analysis showing how trailers would be safely moved throughout facility operations are available and can be supplied. Some swept path analysis movements were supplied in figure 4.4 (page 20) of the Section 37b Pre-Application Consultation Request for Project 402 issued November 2022. Enva has swept path analysis movements prepared and available but are not submitting as we note request not to provide additional reports.

**SDCC Drainage:**

- **1.1 Provide additional SuDS (Sustainable Drainage Systems) such as a green roof on existing on proposed roof or other such SuDS for the development withing the blue line area of development on drawing submitted.**
- **1.2 Surface water should be attenuated to greenfield runoff rates by means of SuDS (Sustainable Drainage Systems). There is no SuDS shown and SuDS should be provided in the proposed development.**
- **The development is in an area that is prone to 1 in 100-year flood event. Submit a justification test report for proposed development.**

**Enva Response:** Given the type of building constructions existing and proposed, provision of a green roof is not a preferred option for Enva.

As a hazardous waste management facility, condition 3.5.2. of EPA licence ref: W0192 requires that Enva *“provide and maintain an impermeable concrete surface in all areas of the facility”* to British Standard 8110. All water arising on site is discharged under licensed conditions and directed first through an oil interceptor before being routed through an attenuation tank. The discharge point on site is fitted with a valve allowing the site to be sealed off in the event of an emergency ensuring that any spillages are isolated from the environment. This condition restricts the ability to provide some ground mounted SUDS.

Enva will undertake and will supply a justification test report for the proposed development if required.

**SDCC: The HSE Environmental Health Officer (EHO) reviewed the planning application and states... “The above proposal is acceptable to the Environmental Health Department – subject to the following conditions:”** Eleven no. of conditions were proposed, and Conditions 1-3 relate to construction noise, and conditions 6 – 10 relate to operation noise. Responses to selected conditions are presented below.

**EHO Noise Condition 2: Where intrusive machinery is required to be used at short notice, the main contractor shall ensure that nearby sensitive locations are informed prior to works commencing.**

**Response:** This condition is onerous as the nearest noise sensitive location is approximately 300m away from the proposed construction activity with line of sight is blocked by a large 4 m high wall and multiple large industrial buildings within Greenoge Business Park. The predicted noise levels from construction activities at the nearest noise sensitive locations are significantly below construction noise criteria and are not significant. Therefore, Enva considers that there is no requirement for a condition of this nature.

**EHO Noise Condition 3: Compliance verification through noise monitoring should be conducted during construction and operational phases of the development to ensure levels as outlined in the EIAR are achieved minimizing impact on Noise Sensitive locations.**

**Response:** During the construction phase, compliance verification at the nearest noise sensitive locations is likely to be difficult as the predicted noise levels from construction activities at the nearest noise sensitive locations are significantly below construction noise criteria and in some instances below the existing ambient noise levels. As noted in the assessment, predicted construction noise effects are not significant and we would argue that the requirement to measure noise levels at the nearest noise sensitive location is not appropriate.

During the operational phase, compliance verification at the nearest noise sensitive locations is likely to be difficult as the predicted noise levels from the proposed development are below the measured background levels for daytime, evening, and night-time periods. However, it is likely that some compliance measurements will be required in keeping with requirements of the existing IED licence for the facility. However, it recommended that an initial survey be undertaken at the boundary and nearest noise sensitive locations and following demonstration of compliance, it would be argued that requirement for annual monitoring be removed.

***EHO Noise Condition 6: Noise levels from the proposed development shall not be so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any residence, adjoining premises, or public place in the vicinity.***

**Response:** The text is similar to text that is included in Section 108 of the *Environmental Protection Agency Act, 1992* and Section 4.3 *General Guidance and Limits for Licensed Sites in the EPAs Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities* (NG4, January 2016). In the NG4 document, the text is in addition to the limit values for noise from licensed sites.

Enva has no issue with this condition, provided it is accompanied with limit values as is the case in the NG4 document.

***EHO Noise Condition 7: Noise due to the normal operation of the proposed development, expressed as  $L_{Aeq}$  over 15 minutes at the façade of a noise sensitive location, shall not exceed the background level for evening and nighttime.***

**Enva Response:** The location of the proposed development and its nearest noise sensitive locations is in an urban area with the proposed development located in a large industrial area (Greenoge Business Park). The noise sensitive locations are not located in quiet areas or low background noise areas as defined in the EPAs NG4 document and if this was a new development the EPAs typical noise limits (55 dB  $L_{Aeq,T}$  – daytime, 50 dB  $L_{Aeq,T}$  – evening and 45 dB  $L_{Aeq,T}$  – night-time) would apply. Furthermore, the Enva facility is currently operated under EPA Industrial Emissions Directive (IED) licence W0192-03 and the Proposed Development will result in an amendment to this licence. The current noise limit criteria is 55 dB during daytime and 45 dB during night-time with the caveat that “*There shall be no clearly audible tonal component or impulsive component in the noise emission from activity at any noise sensitive location.*”

The proposed condition departs from the requirements in the IED licence and NG4 document. It would also be difficult to determine compliance as there are multiple other facilities and noise sources in proximity to the nearest noise sensitive locations and it may not be possible to determine the specific noise from the proposed development when measured at the nearest noise sensitive. Measurements at the nearest NSL would need to be supplemented with spot measurements at the proposed development boundary, measurements between the proposed development and nearest noise sensitive location and supplementing with noise predictions.

***EHO Noise Condition 8: Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level.***

**Enva Response:** Best practice measures will be implemented to minimise operational noise. However, given the nature of the plant and activities, there may be impulsive noise at the facility. However, in accordance with the current IED licence “*There shall be no clearly audible tonal component or impulsive component in the noise emissions from activity at any noise sensitive location.*” As noted in the noise and vibration chapter, no tonal or impulsive character was audible at the nearest noise sensitive locations.

***EHO Noise Condition 9: The applicant shall ensure that the design of noise sources at the facility and the associated abatement measures will ensure that tonal or nuisance noise will not arise at the Noise Sensitive Locations due to facility operation.***

**Enva Response:** Best practice measures will be implemented to minimise operational noise.

***EHO Noise Condition 10: The applicant shall put in place management procedures and a maintenance program for external plant. All mechanical plant items such as motors, pumps, generators etc. shall be regularly maintained to ensure that excessive noise generated by any worn or rattling components is minimised.***

**Our ref: IE000113 - Enva**

**Enva Response:** Best practice measures will be implemented minimise operational noise. These would include regular maintenance of mechanical plant items.

**Uisce Eireann: Various comments.**

**Enva Response:** No comment to make to these proposals.

**Inland Fisheries Ireland: Various comments.**

**Enva Response:** No comment to make to these proposals.

**Health and Safety Authority: Various comments.**

**Enva Response:** No comment to make to these proposals.

**SDCC Heritage, Appropriate Assessment, EIAR.**

**Enva Response:** No comment to make.

**Section C: Other Considerations: community gain conditions; development contribution scheme: special contribution schemes; Parent Permissions.**

**Enva Response:** No comment to make.

In addition to the commentary above, Enva emphasises that it will accept appropriate conditions in any grant of planning approval.

Yours sincerely,  
for RPS Consulting Engineers Limited

**Conor McGovern**

Associate, Resource Management  
conor.mcGovern@rps.tetrattech.com

cc: Kevin McCarthy, Enva