

**CONSTRUCTION &
DEMOLITION WASTE
MANAGEMENT PLAN FOR A
STRATEGIC HOUSING
DEVELOPMENT**

AT

**GROWTH AREA 03 LANDS
AT BALDOYLE (FORMERLY
KNOWN AS THE COAST),
DUBLIN 13**

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The Shoreline Partnership

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Outline Construction & Demolition Waste Management Plan (C&D WMP) on behalf of the Shoreline Partnership for the proposed Strategic Housing Development (SHD) at Baldoyle-Stapolin, Growth Area 03 (GA03) ('the proposed Project' hereafter) located at Baldoyle, Dublin 13. The proposed Project will consist of the construction of a residential-led development with residential apartments, crèche and café unit, along with all hard and soft landscaping, amenity areas, road and services.

The purpose of this plan is to provide the information necessary to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with current legal and industry standards including the *Waste Management Acts 1996 - 2011* and associated Regulations ¹, *Protection of the Environment Act 2003* as amended ², *Litter Pollution Act 1997* as amended ³ and the *Eastern-Midlands Region Waste Management Plan 2015 – 2021* ⁴. In particular, this Plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and / or water).

This C&D WMP includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of C&D waste to be generated by the proposed Project and makes recommendations for management of different waste streams.

2.0 CONSTRUCTION & DEMOLITION WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998 known as '*Changing Our Ways*' ⁵, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. The target for C&D waste in this report was to recycle at least 50% of C&D waste within a five year period (by 2003), with a progressive increase to at least 85% over fifteen years (i.e. 2013).

In response to the *Changing Our Ways* report, a task force (Task Force B4) representing the waste sector of the already established Forum for the Construction Industry, released a report entitled '*Recycling of Construction and Demolition Waste*' ⁶ concerning the development and implementation of a voluntary construction industry programme to meet the Government's objectives for the recovery of C&D waste.

In September 2020, the government released a new national policy document outlining a new action plan for Ireland and its waste to cover the period of 2020-2025. This plan '*A Waste Action Plan for a Circular Economy*' ⁷, was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan '*A Resource Opportunity*' (2012).

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste policy will inform and give direction to waste planning and management in Ireland over the coming years. It will be followed later this year by an All of Government Circular Economy Strategy. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already being used (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across

various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

The National Construction and Demolition Waste Council (NCDWC) was launched in June 2002, as one of the recommendations of the Forum for the Construction Industry, in the Task Force B4 final report. The NCDWC subsequently produced '*Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects*'⁸ in July 2006 in conjunction with the then Department of the Environment, Heritage and Local Government (DoEHLG). The guidelines outline the issues that need to be addressed at the pre-planning stage of a development all the way through to its completion. These guidelines have been followed in the preparation of this document and include the following elements:

- Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;
- Waste disposal / recycling of C&D wastes at the site;
- Provision of training for Waste Manager and site crew;
- Details of proposed record keeping system;
- Details of waste audit procedures and plan; and
- Details of consultation with relevant bodies i.e. waste recycling companies, Fingal County Council etc.

Section 3 of the Guidelines identifies thresholds above which there is a requirement for the preparation of a C&D Waste Management Plan for developments. This proposed Project requires a C&D WMP under the following criterion:

- New residential development of 10 houses or more.

Other guidelines followed in the preparation of this report include '*Construction and Demolition Waste Management – a handbook for Contractors and Site Managers*'⁹, published by FÁS and the Construction Industry Federation in 2002 and the Environmental Protection Agency (EPA) '*Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*' Draft for public consultation¹⁰ (April 2021).

These guidance documents are considered to define best practice for C&D projects in Ireland and describe how C&D projects are to be undertaken such that environmental impacts and risks are minimised and maximum levels of waste recycling are achieved.

2.2 Regional Level

The proposed Project is located in the Local Authority area of Fingal County Council (FCC). The *Eastern-Midlands Region Waste Management Plan 2015 – 2021* is the regional waste management plan for the FCC area published in May 2015.

The Regional Plan sets out the strategic targets for waste management in the region and sets a specific target for C&D waste of "70% preparing for reuse, recycling and other recovery of construction and demolition waste" (excluding natural soils and stones and hazardous wastes) to be achieved by 2020.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €130 - €150 per tonne of waste which includes a €75 per tonne landfill levy introduced under the *Waste Management (Landfill Levy) (Amendment) Regulations 2012*.

The *Fingal Development Plan 2017 – 2023*¹¹ came into effect on March 2017 and sets out a number of objectives for the Fingal region in line with the objectives of the regional waste management plan:

Objectives:

- Objective **WM03**: *Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015 -2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan.*
- Objective **WM07**: *Promote the increased re-use of waste in accordance with the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plan).*
- Objective **WM18**: *Ensure that construction and demolition Waste Management Plans meet the relevant recycling / recovery targets for such waste in accordance with the national legislation and regional waste management policy.*
- Objective **DMS36**: *Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.*
- Objective **DMS37**: *Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.*

With regard to C&D waste specifically, the Development Plan requires that a 70% target for the re-use, recycling and recovery of man-made C&D waste in Ireland by 2020 is required in compliance with the EC (Waste Directive) Regulations 2011.

2.3 Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the project are:

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (SI 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations (S.I No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulations 2007, (S.I No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004) as amended
 - Waste Management (Packaging) Regulations 2014 (S.I. 282 of 2014) as amended
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
 - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
 - Waste Management (Food Waste) Regulations 2009 (S.I. 508 of 2009), as amended
 - European Union (Household Food Waste and Bio-waste) Regulation 2015 (S.I. No. 430 of 2015)
 - Waste Management (Hazardous Waste) Regulations, 1998 (S.I. No. 163 of 1998) as amended

- Waste Management (Shipments of Waste) Regulations, 2007 (S.I. No. 419 of 2007) as amended
- Waste Management (Movement of Hazardous Waste) Regulations, 1998 (S.I. No. 147 of 1998)
- European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)
- European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended.
- Environmental Protection Act 1992 (No. 7 of 1992) as amended.
- Litter Pollution Act 1997 (No. 12 of 1997) as amended.
- Planning and Development Act 2000 (No. 30 of 2000) as amended ¹².

European and national waste management policy is based on the concept of 'waste hierarchy', which sets out an order of preference for managing waste (prevention > preparing for reuse > recycling > recovery > disposal) (Figure 2.1).



Figure 2.1 Waste Hierarchy (Source: European Commission)

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996 - 2001* and subsequent Irish legislation, is the principle of "Duty of Care". This implies that the waste producer is responsible for waste from the time it is generated through to its legal recycling, recovery or disposal (including its method of disposal). As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final destination, waste contractors will be employed to physically transport waste to the final destination. Following on from this is the concept of "Polluter Pays" whereby the waste producer is liable to be prosecuted for pollution incidents, which may arise from the incorrect management of waste produced, including the actions of any contractors engaged (e.g. for transportation and disposal / recovery / recycling of waste).

It is therefore imperative that the client ensures that the waste contractors engaged by construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a contractor handle, transport and recycle / recover / dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR)

or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007 and Amendments* or a waste or IED licence granted by the EPA. The COR / permit / licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and / or disposed of at the specified site.

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Proposed Project

The proposed development site is located at Baldoyle-Stapolin, Dublin 13. It is a site of c. 6.89 hectares, and comprises lands referred to as Growth Area 3 (GA3) within the Baldoyle-Stapolin Local Area Plan. The lands are bound by the Dublin-Belfast / DART train line to the west, existing and proposed residential areas to the south and east, and future Racecourse Park to the north.

The proposed development will consist of the development of 1,221 no. residential apartment/duplex dwellings in 11 no. blocks ranging in height from 2 to 15 storeys and including for residential tenant amenity, restaurant/cafe, crèche, car and bicycle parking and public realm. Residential Tenant Amenity Facilities are located in Blocks E3, E4, G3, G4 & G5 and external communal amenity space is provided at ground, podium and terrace levels throughout the scheme. Car Parking is provided in a mix of undercroft for Blocks E1-E2, F1 and F2 and at basement level for Blocks G1-G3 and G4-G5. Cycle parking spaces are provided for residents, visitors and commercial uses, in secure locations and within the public realm throughout the scheme. A new central public space between Blocks E1-E2 and E3 and E4 and a new linear space between Blocks G2-G3 and G4-G5 provides pedestrian and cycle connectivity from Longfield Road to the proposed future Racecourse Park to the north. A proposed new bus, cycle, pedestrian and taxi ramp to the south of the site and north of Stapolin Square provides access from Longfield Road to Clongriffin Train Station. For a full description of the development please see the Statutory Notices.

3.2 Details of the Non-Hazardous Wastes to be produced

There will be waste materials generated from the excavation of soil and stones to facilitate site clearance, construction of new building foundations and installation of services. The volume of material to be excavated has been estimated by the project engineers at c. 31,966.6 m³. It is envisaged that 21,870.0 m³ of the excavated material will be required to be removed from site. When material is to be removed off-site it will be taken for off-site reuse, recovery and / or disposal. Correct classification and segregation of the excavated material is required to ensure that any potentially contaminated materials are identified and handled in a way that will not impact negatively on workers or the environment.

During the construction phase, there may be a surplus of building materials, such as timber off-cuts, broken concrete blocks, plastics, metals and tiles generated. There may also be excess concrete during construction which will need to be disposed of. Plastic and cardboard waste from packaging and oversupply of materials will also be generated.

Waste will also be generated from construction workers e.g. organic / food waste, dry mixed recyclables (waste paper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables, and potentially sewage sludge from temporary welfare facilities provided on-site during the construction phase. Waste printer / toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

3.3 Potential Hazardous Wastes to be produced

3.3.1 Contaminated Soil

Site investigations and environmental soil testing were undertaken Ground Investigations Ireland (GII) between October 2019 and February 2020 at the proposed Project Site. A selection of samples collected were analysed for a suite of parameters which allows for the assessment of the soils in terms of total pollutant content for classification of materials as hazardous or non-hazardous (RILTA Suite). The suite also allows for the assessment of the sampled material in terms of suitability for placement at licensed landfills (inert, stable non-reactive, hazardous, etc.). The parameter list for the suite includes analysis of the solid samples for arsenic, barium, cadmium, chromium, copper, cyanide, lead, nickel, mercury, zinc, speciated aliphatic and aromatic petroleum hydrocarbons, pH, sulphate, sulphide, moisture content, soil organic matter and an asbestos screen.

The suite also includes those parameters specified in the EU Council Decision establishing criteria for the acceptance of waste at Landfills (Council Decision 2003/33/EC), which for the solid samples are total organic carbon (TOC); speciated aliphatic and aromatic petroleum hydrocarbons; benzene, toluene, ethylbenzene and xylene (BTEX); phenol; polychlorinated biphenyls (PCB); and polycyclic aromatic hydrocarbons (PAH).

GII use HazWasteOnline™, a web-based commercial waste classification software tool, which assists in the classification of potentially hazardous materials. This tool was used to determine whether the materials sampled are classified as hazardous or non-hazardous.

In total, Thirteen (13 No.) samples were assessed using the HazWasteOnline™ Tool. All samples were classified as being non-hazardous and no asbestos was detected.

If any potentially contaminated material is encountered, it will need to be segregated from clean / inert material, tested and classified as either non-hazardous or hazardous in accordance with the EPA publication entitled '*Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous*'¹³ using the *HazWasteOnline* application (or similar approved classification method). The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the *EC Council Decision 2003/33/EC*¹⁴, which establishes the criteria for the acceptance of waste at landfills.

If Asbestos or Asbestos Containing Material (ACMs) are identified, the removal of asbestos will be carried out by a suitably qualified contractor who will only be removed from site by a suitably permitted waste contractor. In accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*. All asbestos will be taken to a suitably licensed or permitted facility.

3.3.2 Fuel / Oils

As fuels and oils are classed as hazardous materials, any on-site storage of these substances, all storage tanks and all draw-off points, will be bunded (or stored in double-skinned tanks) and located in a dedicated, secure area of the site. Provided that these requirements are adhered to and site crew are trained in the appropriate refuelling techniques, it is not expected that there will be any fuel / oil wastage at the site.

3.3.3 Japanese Knot Weed and Other Invasive Plant Species

A site survey was undertaken by Knotweed Control Ireland in August 2019, for the purpose of identifying and managing any schedule 3 (*Regulations SI No. 355/2015*)

invasive species such as Japanese Knotweed (*Fallopia japonica*). This included a walkover survey of the entire site and around part of the outside perimeter. No Japanese knotweed was identified within the redline boundary of the Project.

3.3.4 Other Known Hazardous Substances

Paints, glues, adhesives and other known hazardous substances will be stored in designated areas. They will generally be present in small volumes only and associated waste volumes generated will be kept to a minimum. Wastes will be stored in appropriate receptacles pending collection by an authorised waste contractor.

In addition, WEEE (containing hazardous components), printer toner / cartridges, batteries (Lead, Ni-Cd or Mercury) and / or fluorescent tubes and other mercury containing waste may be generated from during C&D activities or temporary site offices. These wastes (if encountered) will be stored in appropriate receptacles in designated areas of the site pending collection by an authorised waste contractor.

3.4 Main C&D Waste Categories

The main non-hazardous and hazardous waste streams that could be generated by the construction and demolition activities at a typical site are shown in Table 3.1. The List of Waste (LoW) code (as effected from 1 June 2015) (also referred to as the European Waste Code or EWC) for each waste stream is also shown.

Waste Material	LoW/EWC Code
Concrete, bricks, tiles, ceramics	17 01 01-03 & 07
Wood, glass and plastic	17 02 01-03
Treated wood, glass, plastic, containing hazardous substances	17-02-04*
Bituminous mixtures, coal tar and tarred products	17 03 01*, 02 & 03*
Metals (including their alloys) and cable	17 04 01-11
Soil and stones	17 05 03* & 04
Gypsum-based construction material	17 08 01* & 02
Paper and cardboard	20 01 01
Mixed C&D waste	17 09 04
Green waste	20 02 01
Electrical and electronic components	20 01 35 & 36
Batteries and accumulators	20 01 33 & 34
Liquid fuels	13 07 01-10
Chemicals (solvents, pesticides, paints, adhesives, detergents etc.)	20 01 13, 19, 27-30
Insulation materials	17 06 04
Organic (food) waste	20 01 08
Mixed Municipal Waste	20 03 01

Table 3.1 Typical waste types generated and EWCs (individual waste types may contain hazardous substances)

4.0 WASTE MANAGEMENT

4.1 Demolition Waste Generation

As the Site in question is a greenfield site, there is no demolition of structures proposed. There will, however, be existing hardstanding on part of the site that will need to be removed as part of the excavation works.

4.2 Construction Waste Generation

Table 4.1 shows the breakdown of C&D waste types produced on a typical site based on data from the EPA *National Waste Reports*, the *GMIT*¹⁶ and other research reports.

Waste Types	%
Mixed C&D	33
Timber	28
Plasterboard	10
Metals	8
Concrete	6
Other	15
Total	100

Table 4.1 Waste materials generated on a typical Irish construction site

Table 4.2 shows the predicted construction waste generation for the proposed Project based on the information available to date along with the targets for management of the waste streams. The predicted waste amounts are based on an average large-scale development waste generation rates per m², using the waste breakdown rates shown in Table 4.1.

Waste Type	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	2318.4	10	231.8	80	1854.8	10	231.8
Timber	1967.2	40	786.9	55	1081.9	5	98.4
Plasterboard	702.6	30	210.8	60	421.5	10	70.3
Metals	562.0	5	28.1	90	505.8	5	28.1
Concrete	421.5	30	126.5	65	274.0	5	21.1
Other	1053.8	20	210.8	60	632.3	20	210.8
Total	7025.6		1594.8		4770.4		660.4

Table 4.2 Estimated off-site reuse, recycle and disposal rates for construction waste

In addition to the information in Table 4.2, the quantity of excavated material that will be generated has been estimated to be c. 31,966.60 m³. Any suitable excavated material will be temporarily stockpiled for reuse as fill, where possible, all material is expected to be reused on-site. However, it has been estimated that 21,870 m³ of material will be removed off site as it has been deemed no suitable for reuse on-site and will be removed off site for appropriate reuse, recovery and / or disposal.

It should be noted that until final materials and detailed construction methodologies have been confirmed, it is difficult to predict with a high level of accuracy the construction waste that will be generated from the proposed works as the exact materials and quantities may be subject to some degree of change and variation during the construction process.

4.3 Proposed Waste Management Options

Waste materials generated will be segregated on-site, where it is practical. Where the on-site segregation of certain wastes types is not practical, off-site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source, where feasible. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the FCC region that provide this service.

All waste arisings will be handled by an approved waste contractor holding a current waste collection permit. All waste arisings requiring disposal off-site will be reused, recycled, recovered or disposed of at a facility holding the appropriate registration, permit or licence, as required.

Some of the sub-contractors on-site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (Ref. Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste off-site in their work vehicles (which are not design for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

Written records will be maintained by the contractor(s) detailing the waste arising throughout the C&D phases, the classification of each waste type, waste collection permits for all waste contactors who collect waste from the site and COR / permit or licence for the receiving waste facility for all waste removed off site for appropriate reuse, recycling, recovery and / or disposal

Dedicated bunded storage containers will be provided for hazardous wastes which may arise such as batteries, paints, oils, chemicals etc, if required.

The management of the main waste streams is outlined as follows:

Topsoil & Sub-soil

The waste hierarchy states that the preferred option for waste management is prevention and minimisation of waste, followed by preparing for reuse and recycling / recovery, energy recovery (i.e. incineration) and, least favoured of all, disposal. The excavations are required to facilitate construction works so the preferred options (prevention) cannot be accommodated for the excavation phase.

When material is deemed not suitable for reuse on-site it will be removed off-site and could be reused as a by-product (and not as a waste), if this is done, it will be done in accordance with Article 27 of the *European Communities (Waste Directive) Regulations 2011*. Article 27 requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material will not be removed from site until approval from the EPA has been received.

The next option (beneficial reuse) may be appropriate for the excavated material pending environmental testing to classify the material as hazardous or non-hazardous in accordance with the EPA *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* publication. Clean inert material may be used as fill material in other construction projects or engineering fill for waste licensed sites. Beneficial reuse of surplus excavation material as engineering fill may be subject to further testing to determine if materials meet the specific engineering standards for their proposed end-use.

Any nearby sites requiring clean fill / capping material will be contacted to investigate reuse opportunities for clean and inert material. If any of the material is to be reused on another site as a by-product (and not as a waste), this will be done in accordance with Article 27. Similarly, if any soils or stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Article 27.

If the material is deemed to be a waste, then removal and reuse / recovery / disposal of the material will be carried out in accordance with the *Waste Management Acts 1996 – 2011* as amended, the *Waste Management (Collection Permit) Regulations 2007* as amended and the *Waste Management (Facility Permit & Registration) Regulations*

2007 as amended. Once all available beneficial reuse options have been exhausted, the options of recycling and recovery at waste permitted and licensed sites will be considered.

In the event that contaminated material is encountered and subsequently classified as hazardous, this material will be stored separately to any non-hazardous material. It will require off-site treatment at a suitable facility or disposal abroad via Transfrontier Shipment of Wastes (TFS).

Bedrock

It is not anticipated that bedrock will be encountered during the excavation phase of this proposed Project. However, if encountered it is envisaged that all bedrock will be removed off-site and will not be crushed on-site unless the appropriate waste permit is obtained from FCC.

Silt & Sludge

During the construction phase, silt and petrochemical interception will be carried out on run-off and pumped water from site works, where required. Sludge and silt will then be collected by a suitably licensed contractor and removed off-site.

Concrete Blocks, Bricks, Tiles & Ceramics

The majority of concrete blocks, bricks, tiles and ceramics generated as part of the construction and demolition works are expected to be clean, inert material and will be recycled, where possible.

Hard Plastic

As hard plastic is a highly recyclable material, much of the plastic generated will be primarily from material off-cuts. All recyclable plastic will be segregated and recycled, where possible.

Timber

Timber that is uncontaminated, i.e. free from paints, preservatives, glues, etc., will be disposed of in a separate skip and recycled off-site.

Metal

Metals will be segregated into mixed ferrous, aluminium cladding, high grade stainless steel, low grade stainless steel, etc., where practical, and stored in skips. Metal is highly recyclable and there are numerous companies that will accept these materials.

Plasterboard

There are currently a number of recycling services for plasterboard in Ireland. Plasterboard from the demolition and construction phases will be stored in a separate skip, pending collection for recycling. The site manager will ensure that oversupply of new plasterboard is carefully monitored to minimise waste.

Glass

Glass materials will be segregated for recycling, where possible.

Waste Electrical and Electronic Equipment (WEEE)

Any WEEE will be stored in dedicated covered cages, receptacles or pallets, as appropriate, pending collection for recycling.

Other Recyclables

Where any other recyclable wastes such as cardboard and soft plastic are generated, these will be segregated at source into dedicated skips and removed off-site.

Non-Recyclable Waste

C&D waste which is not suitable for reuse or recovery, such as polystyrene, some plastics and some cardboards, will be placed in separate skips or other receptacles. Prior to removal from site, the non-recyclable waste skip / receptacle will be examined by a member of the waste team (see Section 6.0) to determine if recyclable materials have been placed in there by mistake. If this is the case, efforts will be made to determine the cause of the waste not being segregated correctly and recyclable waste will be removed and placed into the appropriate receptacle.

Other Hazardous Wastes

On-site storage of any hazardous wastes produced (i.e. contaminated soil if encountered and / or waste fuels) will be kept to a minimum, with removal off-site organised on a regular basis. Storage of all hazardous wastes on-site will be undertaken so as to minimise exposure to on-site personnel and the public and to also minimise potential for environmental impacts. Hazardous wastes will be recovered, wherever possible, and failing this, disposed of appropriately.

It should be noted that until a construction contractor is appointed it is not possible to provide information on the specific destinations of each construction waste stream. Prior to commencement of construction and removal of any construction waste off-site, details of the proposed destination of each waste stream will be provided to FCC by the project team.

4.4 Tracking and Documentation Procedures for Off-Site Waste

All waste will be documented prior to leaving the site. Waste will be weighed by the contractor, either by weighing mechanism on the truck or at the receiving facility. These waste records will be maintained on site by the nominated project Waste Manager (see Section 6.0).

All movement of waste and the use of waste contractors will be undertaken in accordance with the *Waste Management Acts 1996 - 2011*, *Waste Management (Collection Permit) Regulations 2007* as amended and *Waste Management (Facility Permit & Registration) Regulations 2007* and amended. This includes the requirement for all waste contractors to have a waste collection permit issued by the NWCPO. The nominated project Waste Manager (see Section 6.0) will maintain a copy of all waste collection permits on-site.

If the waste is being transported to another site, a copy of the Local Authority waste COR / permit or EPA Waste / Industrial Emissions (IE) Licence for that site will be provided to the nominated project Waste Manager (see Section 6.0). If the waste is being shipped abroad, a copy of the Transfrontier Shipping (TFS) notification document will be obtained from DCC (as the relevant authority on behalf of all local authorities in Ireland) and kept on-site along with details of the final destination (COR, permits, licences etc.). A receipt from the final destination of the material will be kept as part of the on-site waste management records.

All information will be entered in a waste management recording system to be maintained on site.

5.0 ESTIMATED COST OF WASTE MANAGEMENT

An outline of the costs associated with different aspects of waste management is provided below. The total cost of C&D waste management will be measured and will take into account handling costs, storage costs, transportation costs, revenue from rebates and disposal costs.

5.1 Reuse

By reusing materials on site, there will be a reduction in the transport and recycle / recovery / disposal costs associated with the requirement for a waste contractor to take the material off-site.

Clean and inert soils, gravel, stones etc. which cannot be reused on site may be used as access roads or capping material for landfill sites etc. This material is often taken free of charge or a reduced fee for such purposes, reducing final waste disposal costs.

5.2 Recycling

Salvageable metals will earn a rebate which can be offset against the costs of collection and transportation of the skips.

Clean uncontaminated cardboard and certain hard plastics can also be recycled. Waste contractors will charge considerably less to take segregated wastes, such as recyclable waste, from a site than mixed waste.

Timber can be recycled as chipboard. Again, waste contractors will charge considerably less to take segregated wastes such as timber from a site than mixed waste.

5.3 Disposal

Landfill charges in the Leinster region are currently at around €130 - €150 per tonne which includes a €75 per tonne landfill levy specified in the *Waste Management (Landfill Levy) Regulations 2015*. In addition to disposal costs, waste contractors will also charge a collection fee for skips.

Collection of segregated C&D waste usually costs less than municipal waste. Specific C&D waste contractors take the waste off-site to a licensed or permitted facility and, where possible, remove salvageable items from the waste stream before disposing of the remainder to landfill. Clean soil, rubble, etc. is also used as fill / capping material, wherever possible.

6.0 TRAINING PROVISIONS

A member of the construction team will be appointed as the project Waste Manager to ensure commitment, operational efficiency and accountability during the C&D phases of the project.

6.1 Waste Manager Training and Responsibilities

The nominated Waste Manager will be given responsibility and authority to select a waste team, if required, i.e. members of the site crew that will aid them in the organisation, operation and recording of the waste management system implemented on site. The Waste Manager will have overall responsibility to oversee, record and provide feedback to the client on everyday waste management at the site. Authority will be given to the Waste Manager to delegate responsibility to sub-contractors, where necessary, and to coordinate with suppliers, service providers and sub-contractors to prioritise waste prevention and material salvage.

The Waste Manager will be trained in how to set up and maintain a record keeping system, how to perform an audit and how to establish targets for waste management on site. The Waste Manager will also be trained in the best methods for segregation and storage of recyclable materials, have information on the materials that can be reused on-site and be knowledgeable in how to implement this C&D WMP.

6.2 Site Crew Training

Training of site crew is the responsibility of the Waste Manager and, as such, a waste training program shall be organised. A basic awareness course will be held for all site crew to outline the C&D WMP and to detail the segregation of waste materials at source. This may be incorporated with other site training needs such as general site induction, health and safety awareness and manual handling.

This basic course will describe the materials to be segregated, the storage methods and the location of the Waste Storage Areas (WSAs). A sub-section on hazardous wastes will be incorporated into the training program, and the particular dangers of each hazardous waste will be explained.

7.0 RECORD KEEPING

Records will be kept for all waste material which leaves the site, either for reuse on another site, recycling or disposal. A recording system will be put in place to record the waste arisings on site.

A waste tracking log will be used to track each waste movement from the site. On exit from the site, the waste collection vehicle driver will stop at the site office and sign out as a visitor and provide the security personnel or Waste Manager with a waste docket (or WTF for hazardous waste) for the waste load collected. At this time, the security personnel will complete and sign the Waste Tracking Register with the following information:

- Date
- Time
- Waste Contractor
- Company waste contractor appointed by e.g. Contractor or subcontractor
- Collection Permit No.
- Vehicle Reg.
- Driver Name
- Docket No.
- Waste Type
- EWC / LoW

The waste transfer dockets will be transferred to the site Waste Manager on a weekly basis and can be placed in the Waste Tracking Log file. This information will be forwarded onto the FCC Waste Regulation Unit, when requested.

Alternatively, each subcontractor that has engaged their own waste contractor will be required to maintain a similar waste tracking log with the waste dockets or WTF maintained on file and available for inspection on site by the main contractor as required.

A copy of the Waste Collection Permits, CORs, Waste Facility Permits and Waste Licences will be maintained on site at all times. Subcontractors who have engaged their own waste contractors will provide the main contractor with a copy of the waste collection permits and COR / permit / licence for the receiving waste facilities and maintain a copy on file available for inspection on site as required.

A copy of the Waste Collection Permits, CORs, Waste Facility Permits and Waste Licences will be sent to the FCC Waste Regulation Unit prior to any material being removed from site.

8.0 OUTLINE WASTE AUDIT PROCEDURE

8.1 Responsibility for Waste Audit

The appointed Waste Manager will be responsible for conducting a waste audit at the site during the C&D phase of the proposed Project. Contact details for the nominated Waste Manager will be provided to the FCC Waste Regulation Unit after the main contractor is appointed and prior to any material being removed from site.

8.2 Review of Records and Identification of Corrective Actions

A review of all the records for the waste generated and transported off-site will be undertaken mid-way through the project. If waste movements are not accounted for, the reasons for this will be established and addressed. The waste records will be compared with the established recovery / reuse / recycling targets for the site.

Each material type will be examined, in order to see where the largest percentage waste generation is occurring. The waste management methods for each material type will be reviewed in order to highlight how the targets can be achieved. Waste management costs will also be reviewed.

Upon completion of the C & D phase, a final report will be prepared, summarising the outcomes of waste management processes adopted and the total recycling / reuse / recovery figures for the proposed Project.

9.0 CONSULTATION WITH RELEVANT BODIES

9.1 Local Authority

Once demolition and construction contractors have been appointed, have appointed waste contractors and prior to removal of any C&D waste materials off-site, details of the proposed destination of each waste stream will be provided to the FCC Waste Regulation Unit.

FCC will also be consulted, as required, throughout the demolition, excavation and construction works in order to ensure that all available waste reduction, reuse and recycling opportunities are identified and utilised and that compliant waste management practices are carried out.

9.2 Recycling & Salvage Companies

Companies that specialise in C&D waste management will be contacted to determine their suitability for engagement. Where a waste contractor is engaged, each company will be audited in order to ensure that relevant and up-to-date waste collection permits and facility COR / permits / licences are held. These permit details will be sent to the FCC Waste Regulation Unit. In addition, information regarding individual construction materials will be obtained, including the feasibility of recycling each material, the costs of recycling / reclamation and the means by which the wastes will be collected and transported off-site, and the recycling / reclamation process each material will undergo off site.

10.0 REFERENCES

1. Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate and associated legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended.
 - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended.
 - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I. No. 821 of 2007) as amended.
 - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended.
 - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended.
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
 - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended.
 - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended.
 - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 191 of 2015)
 - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended.
 - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended.
 - The European Communities (Transfrontier Shipment of Hazardous Waste) Regulations 1988 (S.I. No. 248 of 1988)
 - European Communities (Shipments of Hazardous Waste exclusively within Ireland) Regulations 2011 (S.I. No. 324 of 2011)
 - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015)
2. Protection of the Environment Act 2003, (No. 27 of 2003) as amended.
3. Litter Pollution Act 1997 (S.I. No. 12 of 1997) as amended
4. Eastern-Midlands Region Waste Management Plan 2015 – 2021 (2015).
5. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
6. Forum for the Construction Industry – *Recycling of Construction and Demolition Waste*.
7. Department of Communications, Climate Action and Environment (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
8. Department of Environment, Heritage and Local Government, *Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects* (2006).
9. DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002)
10. FÁS and the Construction Industry Federation (CIF), *Construction and Demolition Waste Management – a handbook for Contractors and Site Managers* (2002).
11. Environmental Protection Agency (EPA) '*Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*' Draft (April 2021)

12. Fingal County Council (FCC), Fingal Development Plan 2017-2023 (2017)
13. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended
14. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
15. Council Decision 2003/33/EC, establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC.
16. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
17. EPA and Galway-Mayo Institute of Technology (GMIT), *EPA Research Report 146 – A Review of Design and Construction Waste Management Practices in Selected Case Studies – Lessons Learned* (2015).