

APPENDIX 9.1 AMBIENT AIR QUALITY STANDARDS

National standards for ambient air pollutants in Ireland have generally ensued from Council Directives enacted in the EU (& previously the EC & EEC). The initial interest in ambient air pollution legislation in the EU dates from the early 1980s and was in response to the most serious pollutant problems at that time which was the issue of acid rain. As a result of this sulphur dioxide, and later nitrogen dioxide, were both the focus of EU legislation. Linked to the acid rain problem was urban smog associated with fuel burning for space heating purposes. Also apparent at this time were the problems caused by leaded petrol and EU legislation was introduced to deal with this problem in the early 1980s.

In recent years the EU has focused on defining a basis strategy across the EU in relation to ambient air quality. In 1996, a Framework Directive, Council Directive 96/62/EC, on ambient air quality assessment and management was enacted. The aims of the Directive are fourfold. Firstly, the Directive's aim is to establish objectives for ambient air quality designed to avoid harmful effects to health. Secondly, the Directive aims to assess ambient air quality on the basis of common methods and criteria throughout the EU. Additionally, it is aimed to make information on air quality available to the public via alert thresholds and fourthly, it aims to maintain air quality where it is good and improve it in other cases.

As part of these measures to improve air quality, the European Commission has adopted proposals for daughter legislation under Directive 96/62/EC. The first of these directives to be enacted, Council Directive 1999/30/EC, has been passed into Irish Law as S.I. No 271 of 2002 (Air Quality Standards Regulations 2002), and has set limit values which came into operation on 17th June 2002. The Air Quality Standards Regulations 2002 detail margins of tolerance, which are trigger levels for certain types of action in the period leading to the attainment date. The margin of tolerance varies from 60% for lead, to 30% for 24-hour limit value for PM₁₀, 40% for the hourly and annual limit value for NO₂ and 26% for hourly SO₂ limit values. The margin of tolerance commenced from June 2002, and started to reduce from 1 January 2003 and every 12 months thereafter by equal annual percentages to reach 0% by the attainment date. A second daughter directive, EU Council Directive 2000/69/EC, has published limit values for both carbon monoxide and benzene in ambient air. This has also been passed into Irish Law under the Air Quality Standards Regulations 2002.

The most recent EU Council Directive on ambient air quality was published on the 11/06/08 which has been transposed into Irish Law as S.I. 180 of 2011. Council Directive 2008/50/EC combines the previous Air Quality Framework Directive and its subsequent daughter directives. Provisions were also made for the inclusion of new ambient limit values relating to PM_{2.5}. The margins of tolerance specific to each pollutant were also slightly adjusted from previous directives. In regards to existing ambient air quality standards, it is not proposed to modify the standards but to strengthen existing provisions to ensure that non-compliances are removed. In addition, new ambient standards for PM_{2.5} are included in Directive 2008/50/EC. The approach for PM_{2.5} was to establish a target value of 25 µg/m³, as an annual average (to be attained everywhere by 2010) and a limit value of 25 µg/m³, as an annual average (to be attained everywhere by 2015), coupled with a target to reduce human exposure generally to PM_{2.5} between 2010 and 2020. This exposure reduction target will range from 0% (for PM_{2.5} concentrations of less than 8.5 µg/m³ to 20% of the average exposure indicator (AEI) for concentrations of between 18 - 22 µg/m³). Where the AEI is currently greater than 22 µg/m³ all appropriate measures should be employed to reduce this level to 18 µg/m³ by 2020. The AEI is based on measurements taken in urban background locations averaged over a three year period from 2008 - 2010 and again from 2018-2020. Additionally, an exposure concentration obligation of 20 µg/m³ was set to be complied with by 2015 again based on the AEI.

Although the EU Air Quality Limit Values are the basis of legislation, other thresholds outlined by the EU Directives are used which are triggers for particular actions. The Alert Threshold is defined in Council Directive 96/62/EC as "a level beyond which there is a risk to human health from brief exposure and at which immediate steps shall be taken as laid down in Directive 96/62/EC". These steps include undertaking to ensure that the necessary steps are taken to inform the public (e.g. by means of radio, television and the press).

The Margin of Tolerance is defined in Council Directive 96/62/EC as a concentration which is higher than the limit value when legislation comes into force. It decreases to meet the limit value by the attainment date. The Upper Assessment Threshold is defined in Council Directive 96/62/EC as a concentration above which high quality measurement is mandatory. Data from measurement may be supplemented by information from other sources, including air quality modelling.

An annual average limit for both NO_x (NO and NO₂) is applicable for the protection of vegetation in highly rural areas away from major sources of NO_x such as large conurbations, factories and high road vehicle activity such as a dual carriageway or motorway. Annex VI of EU Directive 1999/30/EC identifies that monitoring to demonstrate compliance with the NO_x limit for the protection of vegetation should be carried out distances greater than: -

- 5 km from the nearest motorway or dual carriageway.
- 5 km from the nearest major industrial installation.
- 20 km from a major urban conurbation.

As a guideline, a monitoring station should be indicative of approximately 1,000 km² of surrounding area.

Under the terms of EU Framework Directive on Ambient Air Quality (96/62/EC), geographical areas within member states have been classified in terms of zones. The zones have been defined in order to meet the criteria for air quality monitoring, assessment and management as described in the Framework Directive and Daughter Directives. Zone A is defined as Dublin and its environs, Zone B is defined as Cork City, Zone C is defined as 23 urban areas with a population greater than 15,000 and Zone D is defined as the remainder of the country. The Zones were defined based on among other things, population and existing ambient air quality.

EU Council Directive 96/62/EC on ambient air quality and assessment has been adopted into Irish Legislation (S.I. No. 33 of 1999). The act has designated the Environmental Protection Agency (EPA) as the competent authority responsible for the implementation of the Directive and for assessing ambient air quality in the State. Other commonly referenced ambient air quality standards include the World Health Organisation. The WHO guidelines differ from air quality standards in that they are primarily set to protect public health from the effects of air pollution. Air quality standards, however, are air quality guidelines recommended by governments, for which additional factors, such as socio-economic factors, may be considered.

APPENDIX 9.2 DUST MANAGEMENT PLAN

The objective of dust control at the site is to ensure that no significant nuisance occurs at nearby sensitive receptors. In order to develop a workable and transparent dust control strategy, the following management plan has been formulated by drawing on best practice guidance from Ireland (DCC, 2018), the UK (IAQM (2014), BRE (2003), The Scottish Office (1996), UK ODPM (2002)) and the USA (USEPA, 1997).

Site Management

The aim is to ensure good site management by avoiding dust becoming airborne at source. This will be done through good design and effective control strategies.

At the construction planning stage, the siting of activities and storage piles will take note of the location of sensitive receptors and prevailing wind directions in order to minimise the potential for significant dust nuisance (see Figure 9.1 for the windrose for Dublin Airport). As the prevailing wind is predominantly south-westerly to westerly, locating construction compounds and storage piles downwind of sensitive receptors will minimise the potential for dust nuisance to occur at sensitive receptors.

Good site management will include the ability to respond to adverse weather conditions by either restricting operations on-site or quickly implementing effective control measures before the potential for nuisance occurs. When rainfall is greater than 0.2mm/day, dust generation is generally suppressed (IAQM, 2014; UK ODPM, 2002). The potential for significant dust generation is also reliant on threshold wind speeds of greater than 10 m/s (19.4 knots) (at 7m above ground) to release loose material from storage piles and other exposed materials (USEPA, 1986). Particular care should be taken during periods of high winds (gales) as these are periods where the potential for significant dust emissions are highest. The prevailing meteorological conditions in the vicinity of the site are favourable in general for the suppression of dust for a significant period of the year. Nevertheless, there will be infrequent periods where care will be needed to ensure that dust nuisance does not occur. The following measures shall be taken in order to avoid dust nuisance occurring under unfavourable meteorological conditions: -

- The Principal Contractor or equivalent must monitor the contractors' performance to ensure that the proposed mitigation measures are implemented and that dust impacts and nuisance are minimised.
- During working hours, dust control methods will be monitored as appropriate, depending on the prevailing meteorological conditions.
- The name and contact details of a person to contact regarding air quality and dust issues shall be displayed on the site boundary, this notice board should also include head/regional office contact details.
- It is recommended that community engagement be undertaken before works commence on site explaining the nature and duration of the works to local residents and businesses.
- A complaints register will be kept on site detailing all telephone calls and letters of complaint received in connection with dust nuisance or air quality concerns, together with details of any remedial actions carried out.
- It is the responsibility of the contractor at all times to demonstrate full compliance with the dust control conditions herein.
- At all times, the procedures put in place will be strictly monitored and assessed.

The dust minimisation measures shall be reviewed at regular intervals during the works to ensure the effectiveness of the procedures in place and to maintain the goal of minimisation of dust through the use of best practice and procedures. In the event of dust nuisance occurring outside the site boundary, site activities will be reviewed and satisfactory procedures implemented to rectify the problem. Specific dust control measures to be employed are described below.

Preparing and Maintaining the Site

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.
- Fully enclose specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
- Cover, seed or fence stockpiles to prevent wind whipping.

Operating Vehicles / Machinery and Sustainable Travel

- Ensure all vehicles switch off engines when stationary - no idling vehicles.
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.
- Impose and signpost a maximum-speed-limit of 20 kph haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.
- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
- Use enclosed chutes and conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

Waste Management

- Avoid bonfires and burning of waste materials.

Measures Specific to Demolition

- Prior to demolition blocks should be soft striped inside buildings (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).

- During the demolition process, water suppression should be used, preferably with a hand-held spray. Only the use of cutting, grinding or sawing equipment fitted or used in conjunction with a suitable dust suppression technique such as water sprays/local extraction should be used.
- Drop heights from conveyors, loading shovels, hoppers and other loading equipment should be minimised, if necessary fine water sprays should be employed.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.

Measures Specific to Earthworks

- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
- Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.
- Only remove the cover in small areas during work and not all at once.
- During dry and windy periods, and when there is a likelihood of dust nuisance, a bowser will operate to ensure moisture content is high enough to increase the stability of the soil and thus suppress dust.

Measures Specific to Construction

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
- For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.

Measures Specific to Trackout

Site roads (particularly unpaved) can be a significant source of fugitive dust from construction sites if control measures are not in place. The most effective means of suppressing dust emissions from unpaved roads is to apply speed restrictions. Studies show that these measures can have a control efficiency ranging from 25 to 80% (UK ODPM, 2002).

- A speed restriction of 20 km/hr will be applied as an effective control measure for dust for on-site vehicles.
- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. If sweeping using a road sweeper is not possible due to the nature of the surrounding area then a suitable smaller scale street cleaning vacuum will be used.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes and any subsequent action in a site log-book.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned.

- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
- Access gates to be located at least 10 m from receptors where possible.

Summary of Dust Mitigation Measures

The pro-active control of fugitive dust will ensure that the prevention of significant emissions, rather than an inefficient attempt to control them once they have been released, will contribute towards the satisfactory performance of the contractor. The key features with respect to control of dust will be: -

- The specification of a site policy on dust and the identification of the site management responsibilities for dust issues.
- The development of a documented system for managing site practices with regard to dust control.
- The development of a means by which the performance of the dust minimisation plan can be regularly monitored and assessed; and
- The specification of effective measures to deal with any complaints received.