

OPERATIONAL WASTE
MANAGEMENT PLAN FOR
PROPOSED
TRANSITIONAL CARE
FACILITY DEVELOPMENT

Report Prepared For

Bartra Property Cookstown Limited

Report Prepared By

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Our Reference

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CO	CONTENTS			
1.0	INTRODUCTION	4		
2.0	OVERVIEW OF WASTE MANAGEMENT IN IRELAND			
	2.1 National Level	4		
	2.2 Regional Level	6		
	2.3 Legislative Requirements	7		
	2.3.1 South Dublin County Council Bye-Laws	7		
	2.4 Regional Waste Management Service Providers and Facilitie	s 8		
3.0	DESCRIPTION OF THE Development	9		
	3.1 Location, Size and Scale of the Development	9		
	3.2 Typical Waste Categories	9		
	3.2.1 Healthcare Waste from the Transitional Care Facility	10		
	Non-Risk/Non-Clinical Non-Hazardous Waste	10		
	Non-Clinical Hazardous Waste	11		
	Healthcare Risk Waste (Hazardous)	11		
	3.3 European Waste Codes	13		
4.0	ESTIMATED WASTE ARISINGS	13		
5.0	WASTE STORAGE AND COLLECTION	14		
	5.1 Waste Storage – Transitional Care Facility	15		
	5.2 Waste Collection	17		
	5.3 Additional Waste Materials	17		
	5.4 Waste Storage Area Design	19		
6.0	CONCLUSIONS	20		
7.0	REFERENCES			

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Bartra Property Cookstown Limited. The proposed development will consist of the demolition of all existing 1-3 storey industrial/commercial structures and small café on site and the construction of a Transitional Care Facility (step-up/step-down facility), at Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations ¹, *Environmental Protection Agency Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the *'Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021'* ⁴, The South Dublin County Council (SDCC) South Dublin County Council Household & Commercial Waste Bye-Laws (2018) ⁵. In particular, this OWMP aims to provide a robust strategy for storing, handling, collection and transport of the wastes generated at site.

In addition, the following guidelines were consulted for healthcare specific waste management practice in relation to the proposed transitional care facility use and supporting medical care:

- Health Service Executive (HSE), Waste Management Awareness Handbook (2011) ⁶; and
- HSE and Department of Health and Children (DOHC), Healthcare Risk Waste Management: Segregation, Packaging and Storage Guidelines for Healthcare Risk Waste, 4th Edition (2010) 7.

This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

At present, there are no specific guidelines in Ireland for the preparation of OWMPs. Therefore, in preparing this document, consideration has been given to the requirements of national and regional waste policy, legislation and other guidelines.

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998 entitled 'Changing Our Ways' 8, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, *Changing Our Ways* stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document, 'Preventing and Recycling Waste – Delivering Change' was published in 2002 ⁹. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled 'Making Irelands

Development Sustainable – Review, Assessment and Future Action' ¹⁰. This document also stressed the need to decouple economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled *'Taking Stock and Moving Forward'* ¹¹. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

In particular, *Taking Stock and Moving Forward* noted a significant increase in the amount of waste being brought to local authority landfills. The report noted that one of the significant challenges in the coming years was the extension of the dry recyclable collection services.

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan 'A Waste Action Plan for a Circular Economy' 12 (WAPCE), 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).

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

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.

One of the first actions to be taken was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021) ¹³ to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports' ¹⁴ detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2019 National Waste Statistics, which is the most recent study published, along with the national waste statistics web resource (November 2021) reported the following key statistics for 2019:

- **Generated** Ireland produced 3,085,652 t of municipal waste in 2019. This is almost a 6% increase since 2018. This means that the average person living in Ireland generated 628 kg of municipal waste in 2019.
- Managed Waste collected and treated by the waste industry. In 2019, a total
 of 3,036,991 t of municipal waste was managed and treated.
- Unmanaged –Waste that is not collected or brought to a waste facility and is, therefore, likely to cause pollution in the environment because it is burned, buried or dumped. The EPA estimates that 48,660 t was unmanaged in 2019.

• Recovered – The amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In 2019, around 83% of municipal waste was recovered – a decrease from 84% in 2018.

- Recycled The waste broken down and used to make new items. Recycling also includes the breakdown of food and garden waste to make compost. The recycling rate in 2019 was 37%, which is down from 38% in 2018.
- **Disposed** Less than a sixth (15%) of municipal waste was landfilled in 2019. This is an increase from 14% in 2018.

2.2 Regional Level

The South Dublin County Council Development Plan 2022– 2028 ¹⁵ sets out a number of objectives and actions for the South Dublin area in line with the objectives of the waste management plan.

Policy and Objectives

Policy IE6: Waste Management

Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.

IE6 Objective 1

To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020 – 2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.

IE6 Objective 2

To support the implementation of the Eastern Midlands Region Waste Management Plan 2015-2021 or as amended by adhering to overarching performance targets, policies and policy actions.

IE6 Objective 4

To provide for and maintain the network of bring infrastructure (e.g. civic amenity facilities, bring banks) in the County to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.

IE6 Objective 7

To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.

IE6 Objective 8

To adhere to the recommendations of the National Hazardous Waste Management Plan 2014-2020 and any subsequent plan, and to co-operate with other agencies including the EPA in the planning, organisation and supervision of the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.

Policy Objective El14: Hazardous Waste

It is a Policy Objective to adhere to the recommendations of the 'National Hazardous Waste Management Plan 2014-2020' and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.

2.3 Legislative Requirements

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

- Waste Management Act 1996 as amended;
- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 (as amended and
- Planning and Development Act 2000 as amended ¹⁶

These Acts and subordinate Regulations transpose the relevant European Union Policy and Directives into Irish law.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 as amended 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 until its legal 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 disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is, therefore, imperative that the residents, staff and the proposed facilities management company undertake on-Site management of waste in accordance with all legal requirements and that the facilities management company employ suitably permitted / licenced contractors to undertake off-Site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contactor handle, transport and reuse / recover / recycle / 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, as amended, or a Waste or Industrial Emissions (IE) 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.

2.3.1 South Dublin County Council Bye-Laws

The SDCC "County of South Dublin (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)" came into effect in December 2018. These Bye-laws repeal the previous SDCC bye-laws; South Dublin County Council Household Waste Bye-Laws 2012 and South Dublin County Council (Storage, Separation at Source, Presentation and Collection of Commercial Waste) Bye-Laws 2007. The Bye-Laws set a number of enforceable requirements on waste holders and collectors with regard to storage, separation, presentation and collection of waste within the SDCC functional area. Key requirements under these Bye-laws are:

- Kerbside waste presented for collection shall not be presented for collection earlier than 8.00pm on the day immediately preceding the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other

public place no later than 8:00am on the day following the designated waste collection day;

- Neither recyclable household kerbside waste nor food waste arising from households shall be contaminated with any other type of waste before or after it has been segregated; and
- A management company, or another person if there is no such company, who
 exercises control and supervision of residential and/or commercial activities in
 multi-unit developments, mixed-use developments, flats or apartment blocks,
 combined living/working spaces or other similar complexes shall ensure that:
 - separate receptacles of adequate size and number are provided for the proper segregation, storage and collection of recyclable household kerbside waste and residual household kerbside waste;
 - additional receptacles are provided for the segregation, storage and collection of food waste where this practice is a requirement of the national legislation on food waste;
 - the receptacles referred to in paragraphs (a) and (b) are located both within any individual apartment and at the place where waste is stored prior to its collection:
 - any place where waste is to be stored prior to collection is secure, accessible at all times by tenants and other occupiers and is not accessible by any other person other than an authorised waste collector,
 - written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection; and
 - an authorised waste collector is engaged to service the receptacles referred to in this section of these bye-laws, with documentary evidence, such as receipts, statements or other proof of payment, demonstrating the existence of this engagement being retained for a period of no less than two years. Such evidence shall be presented to an authorised person within a time specified in a written request from either that person or from another authorised person employed by South Dublin County Council.
 - o The full text of the Waste Bye-Laws is available from the SDCC website.

2.4 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services for the residential sector in the SDCC region. Details of waste collection permits (granted, pending and withdrawn) for the region are available from the NWCPO.

As outlined in the regional waste management plan, there is a decreasing number of landfills available in the region. Only three municipal solid waste landfills remain operational and all are operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second in Poolbeg in Dublin.

There is a SDCC Recycling Centre at Ballymount, Ballymount Avenue, located c. 2.45 km to the north-east of the Development Site, which can be utilised by the residents of the proposed Development for other household waste streams while a bottle bank can be found c. 610 m to the north west at Belgard Ard Mhuire National School.

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all Waste / Industrial Emissions Licenses issued are available from the EPA.

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

Bartra Property Cookstown Limited intend to apply for permission for development at a site of c.1.67ha at Unit 21, First Avenue, Cookstown Industrial Estate, Dublin 24. The development will consist of the following:

- Demolition of all existing 1-3 storey industrial/commercial structures and small café on site totalling c.5,500sqm in area;
- Construction of a 1-5 storey Transitional Care Facility (step-up/step-down) providing 131 no. bedspaces over partial basement (total floor area c.6,743sgm) with central courtyard (c.519sgm);
- The basement consists of a sprinkler tank and pump rooms, water tank room, plant room and workshop;
- Provision of dining and kitchen areas, siting/family rooms, activity rooms, coffee dock, hair salon, oratory, lobbies/reception areas, ancillary offices and staff areas, stores, toilets, shower/changing facilities, ESB substation, generator, switchroom, service yard and waste areas serving the facility;
- Lobbies, stair/lifts, photovoltaic panels and green roofs throughout;
- Partial provision of the pocket park identified in the Tallaght LAP (c.1,286sqm);
- New vehicular access from First Avenue and egress onto Cookstown Road via a one-way system through the subject site;
- Entrance signage on the eastern elevation of the proposed facility;
- All associated site development works, services provision, connection to the water supply, foul and surface water networks on First Avenue and Cookstown Road including partial diversion of the foul line to the north east of the site at First Avenue, temporary foul pump station, attenuation/bioretention systems, vehicular and pedestrian access including internal road and footpaths, interim pedestrian facilities/public realm upgrade works, landscape and boundary treatment works, tree removal, bicycle storage (76 no. total spaces), car parking (32 no. total spaces), set-down parking spaces, 1 no. ambulance set-down space serving the facility and delivery/loading areas to First Avenue.

3.2 Typical Waste Categories

The typical non-hazardous and hazardous wastes that will be generated at the proposed Development will include the following:

- Dry Mixed Recyclables (DMR) includes waste paper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste food waste and green waste generated from internal plants / flowers;
- Glass: and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from external landscaping;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and nonhazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);

- Light bulbs;
- Textiles:
- Waste cooking oil (if any generated by the residents and operators);
- Furniture (and, from time to time, other bulky wastes);
- Abandoned bicycles; and
- Medical Waste.

Wastes should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

3.2.1 Healthcare Waste from the Transitional Care Facility

Healthcare waste is defined in the HSE and DOHC Healthcare Risk Waste Management publication as "solid or liquid waste arising from healthcare". Waste materials generated will fall into two main categories, namely healthcare non-risk waste (i.e. non-clinical healthcare waste) and healthcare risk waste (hazardous) as illustrated in Figure 3.1. Hazardous waste has been further subdivided in this plan into non-clinical hazardous waste and clinical/risk waste.

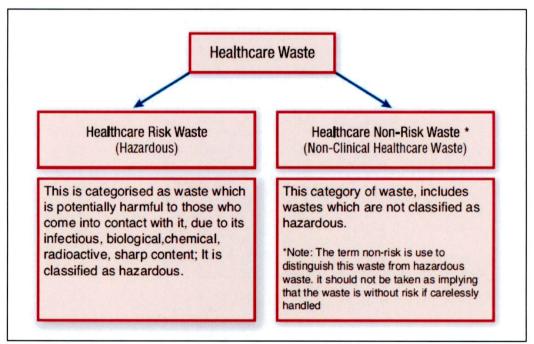


Figure 3.1 Healthcare Waste Categories (Source: HSE, Waste Management Awareness Handbook (2001)

Non-Risk/Non-Clinical Non-Hazardous Waste

The typical non-risk/non-clinical non-hazardous waste streams that will be generated will include the following typical waste categories:

- Dry Mixed Recyclables (DMR) includes cardboard, non-confidential paper, newspaper, leaflets plastic packaging and bottles, aluminium cans, tins and Tetra Pak cartons:
- Confidential paper;
- Mixed Non-Recyclable /General Waste (MNR);
- Organic (food/catering) waste; and
- Glass.

In addition to the typical non-risk/non-clinical non-hazardous waste materials that will be generated on a daily basis, there will be some additional wastes generated on a regular basis that will need to be managed separately including:

- Green/garden waste from landscaping activities;
- Textiles:
- Batteries (non-hazardous) note: hazardous batteries may also be generated which are referred to in Section 3.2.2;
- WEEE including computers, printers and other ICT equipment (non-hazardous) note: WEEE containing hazardous components may also be generated which are referred to in Section 3.2.2; and
- Furniture (and from time to time other bulky wastes).

Non-Clinical Hazardous Waste

The typical non-clinical hazardous waste streams that will be generated will include the following:

- Printer/toner cartridges;
- Batteries (hazardous) note: non-hazardous batteries may also be generated which are referred to in Section 3.2.1;
- WEEE including computers, printers and other ICT equipment (containing hazardous components) note: WEEE not containing hazardous components may also be generated which are referred to in Section 3.2.1;
- Cleaning chemicals (solvents, pesticides, paints, adhesives, resins, detergents, etc.); and
- Light bulbs (Long Life, LED and Lilament bulbs).

Healthcare Risk Waste (Hazardous)

Healthcare risk waste will be generated from the treatment of residents and from contaminated projects associated with treatment. Figure 3.2 over shows the classification and colour coding of healthcare risk waste as presented in the HSE guidance document.

Not all of the waste types listed in Figure 3.2 will be generated at the Transitional Care Facility as the centre will provide care services only and will not carry out significant surgical procedures or cancer care services.

The healthcare risk waste generated at the care centre will comprise waste disposed of in yellow bags (such as dressings, swabs, bandages, gloves, nappies etc.) and yellow sharps buckets (for waste such as needles, syringes, razors, stitch cutters etc.).

ALL OTHER HOUSEHOLD NON

RECYCLABLE WASTE

accordance with their classification and outry in ADR as instructed by the Safety

All bags and containers must have an individual tracing tag or label.
 Containers, marking and labels for healthcare risk waste must conform to ADR requirements.
 Some Waste Authorities may require healthcare non-risk waste to be packaged in clear, or otherwise identified plastic bags.
 Blue (or grey) lidded containers are suggested for this stream - see 6.4.1.3 and related footnote

Notes:

they must be packaged and labelled in

"dangerous goods" class e.g. toxic or flammable solids, liquids or aerosols,

If the products belong to a different

DO NOT OVERFILL

urinary catheters, ventilator, I.V.

N.G.)

ENTERIC FEEDING BAGS

GIVING SETS WITH TIPS

REMOVED

CLEAR TUBING (e.g. oxygen,

best managed by returning them for

disposal to the pharmacy in their

original packaging.

containing healthcare risk waste involving free liquids unless the

material or gelling agent to prevent any spillages from UN packaging

LIQUIDS: Dangerous Goods Regulations require the use of absorbent

container is specifically approved for liquids. All significant quantities

of liquid must be in "leak-proof" containers.

YELLOW RIGID BIN 30X MUST BE SECURELY DO NOT OVERFILL MAXIMUM 3/4 FULL OR AT MANUFACTURER'S LARGE ANATOMICAL INCONTINENCE WEAR (from non-OR BOX WITH BSE/TSE RELATED BLOOD OR TISSUE CLOSED WHEN AT PLACENTAS (SEE BLACK LID NOTE BELOW RE FOR NON-RISK WASTE CONTAMINATED **EMPTY URINARY DRAINAGE** FILL LINE LARGE METAL (SEE 6.4.1.1.4) BODY PARTS ABSORBENT BLACK BAG* -MATERIAL) OBJECTS OXYGEN FACE MASKS nfectious patients) SHARP INSTRUMENTS CYTOTOXIC/CYTOSTA CONTAMINATED WITH NEEDLES, SYRINGES, BIN OR BOX WITH PURPLE LID AND BROKEN GLASS BOX MUST BE SECUREL DO NOT OVERFILL AT MANUFACTURER'S NOT FOR LIQUIDS MAXIMUM 3/4 FULL OR TIC MEDICINES OR CLOSED WHEN AT PHARMACEUTICAL FILL LINE OTHER TOXIC PRODUCTS PHARMACEUTICAL SUBSTANCES YELLOW RIGID BIN OR BOX Note: These waste substances are DANGEROUS GOODS under ADR UN-REGULATED MEDICINAL/ WITH BLUE LID⁴ i.e. products not classified as CONTAMINATED WITH CYTOTOXIC/CYTOSTA HEALTHCARE WASTE SEE NOTE REGARDING BOX MUST BE SECURELY DO NOT OVERFILL ELLOW RIGID BI MAXIMUM 3/4 FULL OR, AT MANUFACTURER'S LIQUIDS BELOW CLOSED WHEN AT OR BOX WITH TIC MEDICINES OR PHARMACEUTICAL PURPLE LID OTHER TOXIC FILL LINE Regulations NON-SHARPS PRODUCTS YELLOW SHARPS **USED SHARP MATERIALS** BOX MUST BE SECURELY AT MANUFACTURER'S BLOOD-STAINED OR MAXIMUM 3/4 FULL OR NOT FOR LIQUIDS DO NOT OVERFILL SHARP TIPS OF I.V. CLOSED WHEN AT WIRES/TROCHARS STITCH CUTTERS BIN OR BOX CONTAMINATED CONTAMINATED FILL LINE SYRINGES SCALPELS NEEDLES RAZORS SLIDES GLASS SETS GUIDE SUCH AS: YELLOW RIGID BIN CLOSED WHEN AT MAXIMUM 3/4 FULL OR, AT MANUFACTURER'S FILL LINE SEE NOTE RE LIQUIDS BOX MUST BE SECURELY NON-CULTURED LAB BODY FLUIDS (not in CONTAINERS FROM DO NOT OVERFILL BLOOD AND BLOOD HISTOLOGY WASTE AUTOCLAVED MICROBIOLOGICAL OR BOX WITH YELLOW LID ADMINISTRATION SUCTION LINERS REDIVAC DRAINS SUSPECTED TB DISPOSABLE BIOLOGICAL KNOWN OR CULTURES WASTE & SPUTUM BELOW SETS bulk) WASTE FROM KNOWN ENTERIC INFECTIONS USED FOR SHARP ITEMS CLOSED WITH CABLE TIE NB. BAGS MUST NOT BE BAG MUST BE SECURELY **EQUIPMENT (GOWNS** CATHETERS, TUBING AND WOUND DRAINS BREAKABLE ITEMS OR OR TAPE WHEN 2/3 FULL DRESSINGS, SWABS ALL BLOOD-STAINED OR CONTAMINATED DO NOT OVERFILL ITEMS INCLUDING:-YELLOW BAG APRONS, GLOVES) OR SUSPECTED INCONTINENCE MAXIMUM Sainoit PROTECTIVE BANDAGES. PERSONAL SUCTION

Figure 3.2 Segregation of Healthcare Risk Waste (Source: HSE and DOHC, Healthcare Risk Waste Management (2010) and HSE, Waste Management Awareness Handbook (2011))

3.3 European Waste Codes

In 1994, the *European Waste Catalogue* ¹⁷ and *Hazardous Waste List* ¹⁸ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* ¹⁹, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA '*Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous*' ²⁰, applicable since the 1st June 2015. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, CORs, permits and licences and the EPA National Waste Database.

Under the classification system, different types of wastes are fully defined by a code. The List of Waste (LoW) code (also referred to as European Waste Code (EWC)) for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1, below.

Table 3.1 Typical Waste Types Generated and LoW Codes

Typical Waste Types Generated and Lovy Codes					
Waste Material	LoW/EWC Code				
Paper and Cardboard	20 01 01				
Plastics	20 01 39				
Metals	20 01 40				
Mixed Non-Recyclable Waste	20 03 01				
Glass	20 01 02				
Biodegradable Kitchen Waste	20 01 08				
Oils and Fats	20 01 25				
Textiles	20 01 11				
Batteries and Accumulators*	20 01 33* - 34				
Printer Toner/Cartridges*	20 01 27* - 28				
Green Waste	20 02 01				
WEEE*	20 01 35*-36				
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc.) *	20 01 13*/19*/27*/28/29*30				
Fluorescent tubes and other mercury containing waste*	20 01 21*				
Bulky Wastes	20 03 07				
Healthcare wastes (wastes from natal care, diagnosis, treatment or prevention of disease in humans, includes non-hazardous and hazardous wastes) *	18 01 01 -18 01 09*				

^{*} Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE ARISINGS

A waste generation model (WGM) developed by AWN has been used to predict waste types, weights and volumes expected to arise from operations within the proposed Development. The WGM incorporates building area and use and combines these with other data, including Irish and US EPA waste generation rates.

The estimated quantum / volume of waste that will be generated from the Transitional Care Facility units has been determined based on the predicted occupancy of the units.

The estimated waste generation for the proposed Development for the main waste types is presented in Tables 4.1.

Table 4.1 Estimated Waste Generation for the Proposed Development.

	Waste Volume (m³ / week)		
Waste Type	Transitional Care Facility		
Organic Waste	0.35		
Dry Mixed Recyclables	2.27		
Glass	0.05		
Mixed Non-Recyclables	1.01		
Cardboard (Baled)	2.31		
Plastic (Baled)	2.91		
Medical Waste	1.10		
Medical Waste (Sharps)	0.06		
Total	10.06		

BS5906:2005 Waste Management in Buildings – Code of Practice ²¹ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed Development. It has been assumed that the all units in the development will generate similar waste volumes over a seven-day period.

5.0 WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the Site will be stored and collected. This has been prepared with due consideration of the proposed Site layout as well as best practice standards, local and national waste management requirements, including those of SDCC. In particular, consideration has been given to the following documents:

- BS 5906:2005 Waste Management in Buildings Code of Practice,
- EMR Waste Management Plan 2015 2021;
- SDCC 'County of South Dublin (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' (2018); and
- DoEHLG, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).

Waste Storage Areas

Locations of all Waste Storage Areas (WSAs) can be viewed on the drawings submitted with the planning application under separate cover.

Transitional Care Facility

Two (2 no.) WSAs have been allocated within the development design for the Transitional Care Facility. These have been strategically located on the ground floor level.

Using the estimated waste generation volumes in Tables 4.1, above, the waste receptacle requirements for MNR, DMR, organic waste, cardboard & plastic bales, glass and medical waste have been established for the WSAs. It is envisaged that MNR, DMR, organic waste, cardboard & plastic bales, glass and medical waste will be collected on a weekly basis.

Waste Storage Requirements

Estimated waste storage requirements for the operational phase of the proposed Development are detailed in Table 5.1, below.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required					
	MNR ¹	DMR ²	Glass	Organic	Additonal	Equipment
Transitional Care Facility WSA	4 no. 1100L	3 no. 1100L	1 no. 120L	2 no. 240L	5 no. bales 1 no. 1100L medical bin	Baler

Note: 1 = Mixed Non-Recyclables

2 = Dry Mixed Recyclables

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type. Waste storage receptacles as per Table 5.1, above, (or similar appropriate approved containers) will be provided by the building management company or operator in the Transitional Care Facility WSA.

The types of bins used will vary in size, design and colour dependent on the appointed waste contractor. However, examples of typical receptacles to be provided in the WSAs are shown in Figure 5.1. All waste receptacles used will comply with the SIST EN 840-1:2020 and SIST EN 840-2:2020 standard for performance requirements of mobile waste containers, where appropriate.



Figure 5.1 Typical waste receptacles of varying size (240 L and 1100 L)

5.1 Waste Storage – Transitional Care Facility

The operator will be required to segregate their waste within the development into the following main waste types:

- DMR;
- MNR;
- Organic waste;
- Glass;
- Cardboard (baling); and
- Plastic (baling).
- Medical

The nominated personnel will bring the segregated waste materials to the appropriate WSA located at ground floor level. Space will be provided in residents rooms to

accommodate bins where practical to facilitate waste segregation (including a sanitary waste bin).

Suppliers for the development should be requested by the operator(s) to make deliveries in reusable containers, minimize packaging or to remove any packaging after delivery where possible, to reduce waste generated by the development.

Signage should be erected above internal bins and in the main WSAs to identify what waste types should be placed into each bin as appropriate. Bins/containers should be labelled and colour coded to avoid cross contamination of the different waste streams.

The majority of waste materials collected in bins in the rooms, common areas etc. will not be segregated and will be managed as MNR waste. House-keeping and Transitional Care Facility cleaning staff will segregate waste, where possible, during cleaning by using segregated containers on their cleaning trolleys. Waste will be transferred from the cleaning carts to the appropriate bins in the WSA via the lifts and internal passageways.

The kitchen in the Transitional Care Facility will contribute a significant portion of the volume of waste generated on a daily basis, and as such it is important that adequate provision is made for the storage and transfer of waste from these areas to the WSA.

It is anticipated that waste will be generated in the kitchens throughout the day, primarily at the following locations:

- Food Storage Areas (i.e. cold stores, dry store, freezer stores and stores for decanting of deliveries);
- Meat Preparation Area;
- Vegetable Preparation Area;
- Cooking Area; and
- Dish-wash and Glass-wash Area;

Small bins will be placed adjacent to each of these areas as required for temporary storage of waste generated during the day. Waste will then be transferred from each of these areas to the WSAs and placed into the segregated bins as detailed in Table 5.1.

All bins/containers in the kitchen areas as well as in the WSAs will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which wastes can be put in each.

Appropriate colour coded, labelled and secured receptacles will be required for healthcare risk waste generated in the building as set out in the HSE, *Waste Management Awareness Handbook* (and illustrated in Figure 3.2). The required healthcare risk waste receptacles will be:

- Yellow bags (stored in rigid bins e.g. 1100L bin)
- Yellow rigid buckets with yellow lid

These waste receptacles will be stored in designated treatment rooms or storage rooms. This room should have at least sharps boxes and the 1 no. 1100 litre yellow clinical waste bin stored in the main waste store.

In addition, clinical waste bags and sharps buckets may be temporarily transferred to utility stores located across the unit during the day prior to transfer to the medical waste room. Where required, these temporary storage locations should have 60/80 litre pedal bins for yellow risk waste bags and shelf storage for sharps buckets.

Other waste materials such as textiles, batteries, printer toner / cartridges, light bulbs, cooking oil, green waste, chemicals, bulky items and WEEE will be generated less frequently by residents and management. Alternative storage areas will be allocated within the Transitional Care Facility operator's own unit to store these items until a licensed waste collector is arranged to collect it. Facilties management may arrange collection, depending on the agreement.

5.2 Waste Collection

There are numerous private contractors that provide waste collection services in the South Dublin County area. All waste contractors servicing the proposed development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered / permitted / licensed facilities only.

Bins from the development will be brought to collection points by the waste contractor or facilities management, immediately prior to collection. It is envisaged that where possible the waste receptacles will be collected directly from the WSAs by the waste contractor to minimise the impact on pedestrians and traffic. All waste will be collected at grade from the allocated loading bays on the northern and eastern side of the development. All locations for collection can be viewed on the drawings submitted with the planning application under separate cover.

A trolley / tug or suitable vehicle may be required to convey the bins to and from the collection area. The building management or waste contractor will ensure that empty bins are promptly returned to the WSAs after collection / emptying.

Suitable access and egress has been provided to enable the bins to be moved easily from the WSA to the waste collection vehicles on the appropriate days. Waste will be collected at agreed days and times by the nominated waste contractors. The location of the collection area is such that it will not obstruct traffic or pedestrians as is recommended in the Design Manual for Urban Roads and Streets (2019) ²².

All waste receptacles should be clearly identified as required by waste legislation and the requirements of the SDCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

It is recommended that bin collection times are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is on-Site. This will be determined during the process of appointment of a waste contractor.

5.3 Additional Waste Materials

In addition to the typical waste materials that are generated on a daily basis, there will be some additional waste types generated from time to time that will need to be managed separately. A non-exhaustive list is presented below.

Green Waste

Green waste may be generated from external landscaping and internal plants / flowers. Green waste generated from landscaping of external areas will be removed by external landscape contractors. Green waste generated from gardens internal plants / flowers can be placed in the organic waste bins.

Batteries

A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place in order to comply with the Waste Management Batteries and Accumulators Regulations 2014, as amended. In accordance with these regulations, consumers are able to bring their waste batteries to their local civic amenity centre or can return them

free of charge to retailers which supply the equivalent type of battery, regardless of whether or not the batteries were purchased at the retail outlet and regardless of whether or not the person depositing the waste battery purchases any product or products from the retail outlet.

The operators cannot use the civic amenity centre. They must segregate their waste batteries and either avail of the take-back service provided by retailers or arrange for recycling / recovery of their waste batteries by a suitably permited / licenced contractor. Facilties management may arrange collection, depending on the agreement.

Waste Electrical and Electronic Equipment (WEEE)

The WEEE Directive (Directive 2002/96/EC) and associated Waste Management (WEEE) Regulations have been enacted to ensure a high level of recycling of electronic and electrical equipment. In accordance with the regulations, consumers can bring their waste electrical and electronic equipment to their local recycling centre. In addition, consumers can bring back WEEE within 15 days to retailers when they purchase new equipment on a like for like basis. Retailers are also obliged to collect WEEE within 15 days of delivery of a new item, provided the item is disconnected from all mains, does not pose a health and safety risk and is readily available for collection.

As noted above, the operator cannot use the civic amenity centre. They must segregate their WEEE and either avail of the take-back / collection service provided by retailers or arrange for recycling / recovery of their WEEE by a suitably permited / licenced contractor. Facilties management may arrange collection, depending on the agreement.

Printer Cartridge / Toners

It is recommended that a printer cartridge / toner bin is provided in the operators areas, where appropriate. The the operator will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

Waste printer cartridge / toners generated by residents can usually be returned to the supplier free of charge or can be brought to a civic amenity centre.

Chemicals

Chemicals (such as solvents, paints, adhesives, resins, detergents, etc) are largely generated from building maintenance works. Such works are usually completed by external contractors who are responsible for the off-site removal and appropriate recovery / recycling / disposal of any waste materials generated.

Any waste cleaning products or waste packaging from cleaning products generated in the the operator that is classed as hazardous (if they arise) will be appropriately stored within the tenants' own space. Facilties management may arrange collection, depending on the agreement.

Any waste cleaning products or waste packaging from cleaning products that are classed as hazardous (if they arise) generated by the residents should be brought to a civic amenity centre.

Light Bulbs

Waste light bulbs (fluorescent, incandescent and LED) will be generated by lighting in the common and service areas. It is anticipated that the operator will be responsible for the off-site removal and appropriate recovery / disposal of these wastes. Facilties management may arrange collection, depending on the agreement.

Light bulbs generated by residents should be taken to the nearest civic amenity centre for appropriate storage and recovery / disposal.

Textiles

Where possible, waste textiles should be recycled or donated to a charity organisation for reuse. The operator and residential tenants will be responsible for disposing of waste textiles appropriately.

Waste Cooking Oil

If the the operator uses cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste contractor will need to be organised as required. Under sink grease traps will be installed in any cooking space.

If the residents generate waste cooking oil, this can be brought to a civic amenity centre or put into the organic waste bins.

Furniture & Other Bulky Waste Items

Furniture and other bulky waste items (such as carpet, etc.) may occasionally be generated by the the operator. The collection of bulky waste will be arranged, as required by the operator. If residents wish to dispose of furniture, this can be brought a civic amenity centre.

Abandoned Bicycles

Bicycle parking areas are planned for the development. As happens in other developments, residents sometimes abandon faulty or unused bicycles, and it can be difficult to determine their ownership. Abandoned bicycles should be donated to charity if they arise or Facilties management willmay arrange collection by a licensed waste contractor.

Covid-19 Waste

Any waste generated by residents or staff that have tested positive for Covid-19 should be manged in accordance with the current Covid-19 HSE Guidelines at the time that that waste arises. At the time this report was prepared, the HSE Guidelines require the following procedure for any waste from a person that tests positive for Covid-19:

- Put all waste (gloves, tissues, wipes, masks) from that person in a bin bag and tie when almost full;
- Put this bin bag into a second bin bag and tie a knot;
- Store this bag safely for 3 days, then put the bag into the non-recyclable waste / general waste wheelie bin for collection / emptying.

Please note that this guidance is likely to be updated by the time the proposed Development is open and occupied and the relevant guidance at the time will need to be reviewed.

5.4 Waste Storage Area Design

The WSAs will be designed and fitted-out to meet the requirements of relevant design Standards, including:

- Be fitted with a non-slip floor surface;
- Provide ventilation to reduce the potential for generation of odours with a recommended 6-10 air changes per hour for a mechanical system for internal WSAs:
- Provide suitable lighting a minimum Lux rating of 400 is recommended;
- Be easily accessible for people with limited mobility;
- Be restricted to access by nominated personnel only;
- Be supplied with hot or cold water for disinfection and washing of bins;

- Be fitted with suitable power supply for power washers;
- Have a sloped floor to a central foul drain for bins washing run-off;
- Have appropriate signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required; and
- Be fitted with CCTV for monitoring.

The building management company, operator and residents will be required to maintain the resident bins and storage areas in good condition as required by the SDCC Waste Bye-Laws.

Access to the WSA will be restricted to authorised staff, be sufficient to allow a 1100 litre bin to pass easily into and out of the room for transfer via the walkway to the waste collection zone.

In accordance with the HSE publication *National Hospital Office – National Cleaning Manual Appendices*, the following specifications are also required:

- The waste receptacle including all component parts should be clean and well-maintained with no blood or body substances, rust, dust, dirt, debris and spillages.
- Bins should be emptied as appropriate, with fresh liners fitted in accordance with local and national policy. Bags should be removed and labelled/tagged when no more than 3/4 full and stored appropriately in a secure location.
- There should be an agreed schedule in operation for replacement of sani-bins in place.
- The sani-bin/nappy bin, including all component parts should be clean and well-maintained with no blood or body substances, rust, dust, dirt, debris and spillages.

The facilities management company will be required to maintain the waste storage areas in good condition as required by the SDCC Waste Bye-Laws.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed Development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus contributing to the targets set out in the *EMR Waste Management Plan 2015 – 2021*.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements of the SDCC Waste Bye-Laws.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.

7.0 REFERENCES

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