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21 July 2004

205-1

re: Notice in accordance with Article 14(2)(b)(ii) of the Waste Management (Licensing) Regulations

Dear Mr. Buckley,

I am to refer to the above referenced application for a waste licence relating to a facility at Crag Avenue, Clondalkin Industrial Estate, Clondalkin, Co. Dublin. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations, 2000-2002.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

#### ARTICLE 12 COMPLIANCE REQUIREMENTS

1. Clarify the quantity and nature of wastes to be handled as per Article 12(1)(g). The Agency refers you to the following tables of the application:
  - B.8.1
  - Attachment D.3
  - E.2.1

For each waste type stated in Table E.2.1 list the relevant EWC codes for the wastes which comprise that waste type. The information submitted should clearly indicate the wastes which make up each type. Give the tonnage of organic waste in each waste type and the total of organic waste to be accepted per annum.

2. Complete Table 1.10 of the application form for each raw material, substance or preparation to be utilised in the activity to include, as a minimum, "Aironaut" and the detergent to be used in the truck wash.
3. Describe the methods, processes and operating procedures for handling of household waste.

4. The Agency notes a discrepancy between the statements contained in Section A.1.5 page 12 & Attachment D2 page 46 of the application and Section 12.10.1 of the EIS in relation to the handling and processing of organic material contained in mixed waste. Clarify which method is to be used.
  5. Supply detailed information on the processes to be carried out under Class 8, Class 9 and Class 11 of the Fourth Schedule of the Waste Management Act, 1996 to include, in particular, the conversion of waste vegetable oil to biodiesel and use of the biodiesel.
  6. Describe the plant, methods, processes and operating procedures for processing of WEEE.
  7. The Agency notes a discrepancy between the statements in Attachments A.1.5 and E.6 and those in Attachments E.4 and F.3 in relation to control of odour and dust. Clarify what dust and odour control systems are proposed for the site.
  8. Having regard to the Agency's "Waste Licensing Waste Recovery/Disposal Activities Guidance Note for Applicants", Section L.3 *Financial Provision*, provide information for the purpose of enabling the Agency to make a determination in relation to the matter specified in paragraph (d) of Section 40(4) of the Waste Management Act, 1996 to 2003.
  9. Give full particulars of the source, composition, quantity, level and rate of emissions to sewer and the period or periods during which such emissions are to be made. This information shall include, as a minimum, details relating to collection and treatment of effluent arising from:
    - truck wash;
    - dust and odour suppression systems;
    - floor washing in the materials recovery building.
- Submit a new revision of drawing DG0015 with any amendments. This drawing shall clearly indicate the source of any effluent, its route to the final discharge point to sewer and the location of this point.
10. Submit information in relation to the requirements of Article 12(1)(n) of the Waste Management (Licensing) Regulations 2000-2002.
  11. Having regard to the Agency's "Waste Licensing Waste Recovery/Disposal Activities Guidance Note for Applicants", Section G, provide detailed information on the proposed measures for the closure, restoration, remediation or aftercare of the facility, after the cessation of the activity.
  12. The Agency notes a discrepancy between the statements in Attachment A.1.9 and Attachment D.2 in relation to the proposed arrangements for the off-site treatment or disposal of solid or liquid wastes. You are required to clarify your position on this issue.



13. The Agency notes from the information supplied in Tables B.8.1 and E.2.1 that it is proposed to accept up to 3,000 tonnes per annum of hazardous waste at the facility. It is the opinion of the Agency that hazardous waste operations as per Activity No. 9 of the First Schedule of the Waste Management (Licensing) Regulations S.I. No. 185 of 2000 is proposed. Provide the Agency with the appropriate fee, as per Article 12(4), for the disposal of hazardous waste.

#### ARTICLE 13 COMPLIANCE REQUIREMENTS

1. Figure 5.6 of the EIS refers to "source separated organics". Clarify the proposed source of such waste to be accepted at the facility.
2. The Agency notes a discrepancy between the statements contained in Section A.1.5 page 12 & Attachment D2 page 46 of the application and Section 12.10.1 of the EIS in relation to the handling and processing of organic material contained in mixed waste. Clarify which method is to be used.

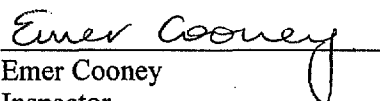
Your reply to this notice should include a revised non-technical summary (Waste Licence Application Form and EIS) which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

The requested information should be submitted to the Agency within one month of the date of this notice, in order to allow the Agency to process and determine your application. Please supply Article 12 information in the form of an original and five copies and Article 13 information in the form of an original and fifteen copies.

Please note that the application's register number is 205-1. Please direct all correspondence in relation to this matter to *Administration, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,

  
Emer Cooney  
Inspector  
Office of Licensing & Guidance

