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27th January 2005

214-1

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

Dear Mr. O'Brien,

I am to refer to the above referenced application for a waste licence relating to the facility Ted O'Donoghue and Sons Ltd., Knockpogue, Waterfall, County Cork. 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 of the Waste Management (Licensing) Regulations.

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

A. Non-Technical Summary

1. This summary should include the normal operating hours and days per week of the activity.
2. Include details requested in Article 12(j) of the Waste Management (Licensing) Regulations as amended.

B. General

1. Submit a confirmation letter from the planning authority that an EIS was not required for the increase in waste quantities proposed for the site.
2. Clarify the stage of planning of the proposed administration building detailed in attachment F.1.4 and the external storage bays detailed in attachment D.1.q.

3. Reassess fee submitted refer to Part 1 of the Third Schedule of the Waste Management (Licensing) Regulations, S.I. No. 395 of 2004. Note two fees are required if both disposal and recovery are applied for.

C. Management of the Facility

1. Provide relevant details for deputy site manager Oliver O' Donoghue in table C.1.1.
2. Given the increase in the waste quantities proposed for the site and the proposed hours of operation indicate operational staffing levels required to meet the increased capacity of the proposed waste activities.

D. Infrastructure & Operation

1. Clarify if soil berm is outside the site boundary area submitted in Drawing No.1, resubmit drawing.
2. Submit information on the standard to which the bund integrity tests were conducted and information on the standard to which the bunds are constructed.
3. Provide details of the storage unit proposed for the storage of gas bottles and the types of bottles and gases proposed.
4. Submit proposals with associated time frames for the provision of a wheel wash on site. Provision for the treatment of drainage from the wash should be included.
5. Provide time frame for the provision of surface water infrastructure on site, this infrastructure should include provision for the maintenance of impermeable concrete surfaces in all areas of the facility. Submit a separate drawing of the proposed surface water system to include locations of all oil interceptors. The drainage system should be designed to provide adequate protection from potential sources of pollution and storm water flows. Refer to the *EPA Draft BAT Guidance notes for the Waste Sector: Transfer Activities* and the *EPA Guidance Note on Storage and Transfer of Materials for Scheduled Activities* in drafting your response.
6. Provide time frame for the provision of a wastewater treatment system at the facility for the treatment of trade effluent arising on site. This effluent includes drainage from operational areas including the truck wash facility, wheel wash and runoff from soil, C & D, green waste and wood shredder areas. Your response should include detailed proposals and drawings.
7. Provide information on the capacity of the proprietary treatment unit proposed for the site and the proposed time frame for its installation.

8. Provide an assessment of the adequacy of the volume provided in the storage tank beneath the waste transfer building taking into account the increase in waste volumes proposed. Provide details on the current rates of effluent removal and its disposal route.
9. Provide timeframe and specifications for the construction of external storage areas for recovered soil, C & D rubble, green waste and chipped wood.
10. Resubmit Drawing No. 1100-03 to show location of proposed site facility office and truck wash areas.
11. Give details of the storage capacity on site for each waste types proposed and the quantity to be accepted daily, provide information on the operating capacity of the facility on a daily basis ensuring sufficient daily duty and standby capacity is provided.
12. Outline what constitutes 'green waste' in your application.
13. Provide details of the proposed disposal route for tyres collected on site and the storage capacity available.
14. Provide details of the proposed disposal route for organic material collected on site the storage capacity available and location. Provide information on the length of time this material will be held on site before disposal.
15. Provide figures for the number of vehicle movement on a daily basis that will result from proposed waste activities and the number of vehicles the site infrastructure can cater for.

E. Emissions

1. Complete Table E.2 (i) and (ii) of the application and reassess details in attachment E.2, both should reflect changes as a result of response to question D.5 and 6 above.
2. Complete Table E.5(i) of the application.
3. Provide specific details on control measures for dust emissions as a result of timber shredding and also from the storage of soil, C& D and any other external dusty waste piles refer to the EPA *Draft BAT Guidance notes for the Waste Sector: Transfer Activities* in drafting your response.

F. Control & Monitoring

1. Provide a timeframe for the installation of the Mist-Air: dust suppression and odour absorption system proposed.

2. Provide details of the storage arrangement for hazardous and flammable chemicals in the workshop/garage building on site.

3. Provide details of the location for the proposed bunded waste quarantine area for liquid waste on site.

I. Existing Environment.

1. Provide an assessment of the quality of the Curraheen River upstream and downstream of the entrance of the drain from the site.

2. Provide analysis of the discharge from the surface drain presently on site at the point of entrance to the land drain.

3. Provide information on any Natural Heritage Areas and Special Protection Areas within 5km of the site confirm that there will be no significant environmental emissions from the facility, which could give rise to adverse effects in these sites.

J Accident Prevention and Emergency Response

1. Assess the adequacy of the fire fighting equipment on site taking account of the volumes and types of waste stored. Carry out an assessment to determine the capacity and adequacy of firewater retention on site in the surface water drainage system as proposed.

Your reply to this notice should include a revised non-technical summary, 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.

Please supply the information in the form of a one original plus two copies within **one** month of the date of this notice. In addition submit one copy CD-ROM to the Agency. The e-file should be saved as a 'pdf' file, read only status.

Please note that the application's register number is **214-1**. If you have any further queries please contact Ms. Niamh O' Donoghue at the number above Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Ms. Marie O' Connor
Senior Inspector
Office of Licensing & Guidance