



Headquarters,
P.O. Box 3000,
Johnstown Castle Estate,
County Wexford, Ireland

WASTE LICENCE PROPOSED DECISION

Waste Licence
Register Number: 105-1
Applicant: Returnbatt Limited
Location of Facility: Unit 35, Kildare Enterprise Centre,
Melitta Road, Kildare

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Reasons for the Proposed Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this licence any emissions from the activity will comply with and not contravene any of the requirements of Section 40(4) of the Waste Management Act, 1996.

In reaching this decision the Agency has considered the application and supporting documentation received from the applicant and the report of its inspector.

Part I - Activities Licensed

In pursuance of the powers conferred on it by the Waste Management Act, 1996, the Environmental Protection Agency (the Agency) proposes, under Section 40(1) of the said Act to grant this Waste Licence to Returnbatt Limited, Unit 35, Kildare Enterprise Centre, Melitta Road, Kildare to carry on the waste activities listed below at Unit 35, Kildare Enterprise Centre, Melitta Road, Kildare subject to eleven Conditions, with the reasons therefor and the associated schedules attached thereto set out in the licence.

Licensed waste disposal activities, in accordance with the Third Schedule of the Waste Management Act, 1996

Class 13: Storage prior to submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.

This activity is limited to the storage of batteries and their components pending disposal.

Licensed waste disposal activities, in accordance with the Fourth Schedule of the Waste Management Act, 1996

Class 3: Recycling or reclamation of metals and metal compounds.

This activity is limited to the mechanical processing of batteries and separation of their component parts.

Class 13: Storage of waste intended for submission to any activity referred to in a preceding paragraph of this Schedule, other than temporary storage, pending collection, on the premises where such waste is produced.

This activity is limited to the storage of batteries and their components pending recovery.

INTERPRETATION

Act	The Waste Management Act, 1996 (No. 10 of 1996).
Adequate lighting	20 lux measured at ground level.
AER	Annual Environmental Report
Agency	Environmental Protection Agency
Agreement	Agreement in writing.
Annually	All or part of a period of twelve consecutive months.
Application	The application by the licensee for this waste licence, including any other material submitted to the Agency in writing by the licensee between the date of the application and the date of grant of this licence.
Attachment	Any reference to Attachments in this licence refers to attachments submitted as part of the waste licence application.
Bi-annually	All or part of a period of six consecutive months.
Bund	A structure to provide containment for any loss of liquid from a storage tank and associated pipework. The Agency's Landfill Design Manual (draft) sets forth design criteria.
Condition	Condition of this licence. In any case where this licence refers to a numbered condition, the reference shall be taken to mean the condition and any sub-condition therein which the context of the reference requires that reference is to be made to.
Containment boom	A boom which can contain a spillage and prevent it from entering drains or watercourses.
Daily	Consecutive 24 hour periods
Day	A period from 0000 hours to 2400 hours
Documentation	Any report, record, result, data, drawing, proposal, interpretation or other document in written or electronic form which is required by this licence.
Drawing	Any reference to a drawing or drawing number means a drawing or drawing number contained in the application, unless otherwise specified in this licence.
Emission	As defined in Section 5 (1) of the Act.
Emission limit value	Those limits, including concentration limits or deposition limits, contained in Schedule F.
EMP	Environmental Management Plan

Environmental

pollution	As defined in Section 5 (1) of the Act.
European Waste Catalogue (EWC)	A harmonised, non-exhaustive list of wastes drawn up by the European Commission and published as Commission Decision 94/3/EC and any subsequent amendment published in the Official Journal of the European Community.
EWC	See <i>European Waste Catalogue</i>
Facility	That area or areas defined under Condition 1.2 of this licence.
Hazardous waste	As defined in Section 4 (2) of the Act.
Incident	Any reference to an incident in this licence means an incident as defined in Condition 3.1
Licence	A Waste Licence issued in accordance with the Act.
Licensee	Returnbatt Limited
Local authority	Kildare County Council
Maintain	Keep in a fit state, including such regular inspection, servicing and repair as may be necessary to adequately perform its function.
Monthly	At least 12 times per year, once during each calendar month.
Recovery	As defined in Section 4 (4) of the Act.
Sanitary authority	Kildare County Council
Specified emissions	Those emissions listed in Schedule F of this licence.
Specified engineering works	Those engineering works listed in Schedule D of this licence.
Submit	Unless the context of this licence indicates otherwise, submit to the Agency in writing for agreement
Trade effluent	As defined in the Local Government (Water Pollution) Act, 1977
Trigger level	A parameter value which when achieved or exceeded requires certain actions to be taken.
Waste	As defined in Section 4 (1) of the Act.
Waste disposal activity	Includes the activities referred to in Section 4 of the Act and listed in the Third Schedule thereto.
Waste recovery activity	Includes the activities referred to in Section 4 of the Act and listed in the Fourth Schedule thereto.

Part II - CONDITIONS

Condition 1 SCOPE

- 1.1. Waste activities at the facility shall be restricted to those listed and described in *Part I - Activities Licensed* and required by the licence.
- 1.2. Waste activities shall be restricted to the area of land outlined in red on the Site Plan, drawing no. Rtb 003 (dated 27/9/99 and received at the offices of the Agency on 4/1/00) of the application. Any reference in this licence to "facility" shall mean the area thus outlined in red.
- 1.3. Every plan, programme or proposal submitted to the Agency for agreement pursuant to any condition of this licence shall include a proposed timescale for its implementation. The Agency may modify or alter any such plan, programme or proposal, in so far as it considers such modification or alteration to be necessary. Every plan, programme or proposal shall be carried out within the timescale fixed by the Agency but shall not be undertaken without the agreement of the Agency.
- 1.4. This licence is for the purposes of waste licensing under the Waste Management Act, 1996 only, and nothing in this licence shall be construed as negating the licensee's statutory obligations or requirements under any other enactments or regulations.
- 1.5. Where the Agency considers that a non-compliance with the Conditions of this licence has occurred, it may serve a notice on the licensee specifying:
 - (a) that only those wastes as specified, if any, in the notice are to be accepted at the facility after the date specified in the notice;
 - (b) that the licensee shall undertake the works stipulated in the notice, and/or otherwise comply with the requirements of the notice as set down therein, within any time-scale contained in the notice; and
 - (c) that the licensee shall carry out any other requirement specified on the notice.

When the notice has been complied with, the licensee shall provide written confirmation that the requirements of the notice have been carried out. No waste, other than that which is stipulated in the notice, shall be accepted at the facility until written confirmation is received from the Agency that the notice is lifted.

Reason: To clarify the scope of this licence.

Condition 2 MANAGEMENT OF THE ACTIVITY

- 2.1. Environmental Management System
 - 2.1.1 The licensee shall within eighteen months from the date of grant of this licence, submit to the Agency for its agreement a proposal for a documented Environmental Management System (EMS) for the facility. Following the agreement of the Agency, the licensee shall establish and maintain such a system. The EMS shall be updated on an annual basis with amendments being submitted to the Agency for agreement.
 - 2.1.2 The EMS shall include as a minimum those elements specified in the Conditions 2.2 to 2.7 below:

2.2. Schedule of Environmental Objectives and Targets

- 2.2.1 The licensee shall, within twelve months from the date of grant of this licence, submit to the Agency for its agreement a Schedule of Objectives and Targets. The objectives should be specific and the targets measurable.
- 2.2.2 The Schedule shall address a five-year period as a minimum and shall be reviewed and submitted annually to the Agency for its agreement.

2.3. Environmental Management Programme

- 2.3.1 The licensee shall, within twelve months from the date of grant of this licence, submit to the Agency for its agreement an Environmental Management Programme (EMP). The EMP shall include a time-scale for achieving the Schedule of Objectives and Targets and shall comply with any other guidance issued by the Agency.
- 2.3.2 The EMP shall include, as a minimum, the information specified in *Schedule A: Content of the Environmental Management Programme*. The EMP shall be reviewed and submitted to the Agency for its agreement annually.

2.4. Corrective Action

- 2.4.1 Within six months from the date of grant of this licence, the licensee shall establish and maintain written Corrective Action Procedures to ensure that corrective action is taken should specified requirements to this licence not be fulfilled.

2.5. Awareness and Training

- 2.5.1 Within six months from the date of grant of this licence, the licensee shall establish and maintain Awareness and Training Procedures for identifying training needs and for providing appropriate training, for personnel whose work is related to the licensed facility. Written records of training shall be maintained.

2.6. Management Structure

- 2.6.1 Within three months from the date of grant of this licence, the licensee shall submit written details of the management structure of the facility for the agreement of the Agency. Any proposed changes in the management structure shall be submitted in writing to the Agency for its agreement. Written details of the management structure shall include the following information:
- (a) the names of all persons who are to provide the management and supervision of the waste activities authorised by the licence;
 - (b) a named contact person for communications with the Sanitary Authority;
 - (c) details of the responsibilities for each individual named under (a) above;
 - (d) details of the relevant experience, competence and qualifications held by each of the persons nominated under (a) above; and
 - (e) contingency arrangements for the absences of the named persons from the facility.

2.7. Communications

- 2.7.1 Within twelve months from the date of grant of this licence, the licensee shall submit for agreement to the Agency a Communications Programme to ensure that members of the public can obtain information concerning the environmental performance of the facility at all reasonable times.

2.8. Annual Environmental Report

- 2.8.1 The licensee shall submit to the Agency for its agreement, within thirteen months from the date of grant of this licence, and within one month of the end of the year thereafter, an Annual Environmental Report (AER).
- 2.8.2 The AER shall include as a minimum the information specified in *Schedule B: Content of Annual Environmental Report* and shall be prepared in accordance with any relevant written guidance issued by the Agency.

- 2.9. The licensee shall employ a suitably qualified and experienced facility manager who shall be designated as the person in charge. The facility manager or a suitably qualified and experienced deputy shall be present at all times during the operation of the facility.

- 2.10. The licensee shall ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and/or experience, as required and shall be aware of the requirements of this licence.

Reason: To make provision for management of the activity on a planned basis having regard to the desirability of ongoing assessment, recording and reporting of matters affecting the environment.

Condition 3 NOTIFICATION AND RECORD KEEPING

- 3.1. The licensee shall make written records of the following incidents:

- (a) any nuisance caused by the activity
- (b) any emission which results in the contravention of any relevant standard, including any standard for an environmental medium, or any relevant emission limit value, prescribed under any relevant enactment;
- (c) any emission which does not comply with the requirements of this licence;
- (d) any trigger level specified in this licence which is attained or exceeded;
- (e) any indication that environmental pollution has, or may have, taken place; and,
- (f) any emergency.

- 3.2. The written record of an incident as specified in Condition 3.1 shall include all aspects described in Condition 10.6(a) to (e).

- 3.3. Unless otherwise instructed in writing by the Agency, the licensee shall:

- (a) notify the Agency as soon as practicable and in any case not later than 10.00 am the following working day after the occurrence of any incident;

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- (b) submit the written record required by this condition to the Agency as soon as practicable and in any case within five working days after the occurrence of any incident; and
 - (c) in the event of any incident which relates to discharges to sewer or surface water, notify Kildare County Council and/or the Eastern Regional Fisheries Board, as appropriate, as soon as practicable and in any case not later than 10.00 am on the following working day after such an incident.
 - 3.4. Should any further actions be taken after the date of written notification, as a result of an incident occurring, the licensee shall forward a written report of those actions to the Agency as soon as practicable and no later than ten days after the initiation of those actions.
 - 3.5. Unless otherwise agreed by the Agency, all documentation submitted to the Agency shall:
 - (a) be sent to the Agency's headquarters;
 - (b) comprise one original and three copies;
 - (c) be formatted in accordance with any written instruction or guidance issued by the Agency;
 - (d) be identified by a unique code, indicate any modification or amendment, and be correctly dated to reflect any such modification or amendment;
 - (e) be submitted in accordance with the relevant reporting frequencies specified by this licence;
 - (f) be certified as accurate and representative by the licensee; and
 - (g) in the case of results of any environmental monitoring, be accompanied by a written interpretation setting out their significance.
 - 3.6. Copies of all environmental monitoring data obtained by the licensee which relates to the facility shall be forwarded to the Agency at the frequencies set out in *Schedule C: Recording and Reporting to the Agency* to this licence.
 - 3.7. Unless otherwise agreed in writing with the Agency, all documentation required to be maintained under this licence, shall be retained by the licensee.
 - 3.8. The licensee shall provide additional copies of any documentation referred to in this licence to the Agency upon written request, within the time specified in writing by the Agency.
 - 3.9. The licensee shall keep the following documents at the office referred to in Condition 4.4:
 - (a) the current waste licence relating to the facility;
 - (b) the current Environmental Management System for the facility;
 - (c) the previous year's Annual Environmental Report for the facility;
 - (d) all written procedures produced by the licensee which relate to the licensed activities; and

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- (e) material safety data sheets for all liquid wastes stored or generated at the facility.

3.10. The licensee shall maintain a written record for each load of waste arriving at or leaving the facility. The licensee shall record the following:

- (a) the date of arrival or departure;
- (b) a description of the waste load including the associated EWC codes;
- (c) the quantity of waste, recorded in kilograms;
- (d) where incoming or outgoing loads or parts thereof are removed or rejected, details of the date of occurrence, the types of waste and the facility to which they were removed;
- (e) a consignment note number (including transfrontier shipment notification and movement/tracking form numbers, as appropriate);
- (f) the destination of outgoing waste (including a facility name and waste licence or permit number as appropriate); and
- (g) any other information which might be required from time to time by the Agency.

3.11. The licensee shall maintain a written record of all complaints of an environmental nature relating to the operation of the activity. Each such record shall give details of the following:

- (a) date and time of the complaint;
- (b) the name of the complainant;
- (c) details of the nature of the complaint;
- (d) actions taken on foot of the complaint and the results of such actions; and
- (e) the response made to each complainant.

Reason: To provide for the notification of incidents, to update information on the activity and to provide for the keeping of records.

Condition 4 SITE INFRASTRUCTURE

4.1. The licensee shall establish all infrastructure referred to in this licence prior to the commencement of the licensed activities, or as instructed by the Agency, or as otherwise set out in the licence.

4.2. Site Notice Board

- 4.2.1 Within three months from the date of grant of this licence, a site notice board shall be provided and maintained by the licensee on the facility, so that it is legible to persons outside the main entrance to the facility. The minimum dimensions of the identification board shall be 1200 mm by 750 mm.

4.2.2 The board shall clearly show:

- (a) the name and telephone number of the facility;
- (b) the normal hours of operation;
- (c) the name, address and telephone number of the licence holder;
- (d) an emergency out of hours contact telephone number;
- (e) the name, address and telephone number of the operator of the facility;
- (f) the waste licence reference number; and
- (g) where and when environmental monitoring information relating to the facility can be obtained.

4.3. Site Security

4.3.1 Security arrangements shall be as described in Attachment D.1 (dated 30 September 1999) of the application.

4.3.2 The facility shall be kept locked shut when unsupervised.

4.4. The licensee shall provide and maintain an office on the facility. The office shall be constructed and maintained in a manner suitable for the processing and storing of documentation.

4.5. The licensee shall provide and maintain a working telephone and facsimile machine in the office specified in Condition 4.4 above.

4.6. The licensee shall provide and use adequate lighting during the operation of the facility in hours of darkness.

4.7. Bunding

4.7.1 All waste and chemical storage areas shall be rendered impervious to the materials stored therein. In addition, waste storage areas shall, as a minimum be bunded, either locally or remotely, to a volume not less than the greater of the following:

- (a) 110% of the capacity of the largest tank or drum within the bunded area
- (b) 25% of the total volume of substance which could be stored within the bunded area.

4.7.2 All drainage from bunded areas shall be diverted for collection and safe disposal.

4.7.3 All inlets, outlets, vent pipes, valves and gauges must be within the bunded area.

4.7.4 The loading and unloading of waste and the transfer of waste liquids shall be carried out in designated and bunded areas protected against spillage.

4.7.5 The integrity and water tightness of all bunds, tanks and containers and their resistance to penetration by water or other materials stored therein shall be tested and demonstrated by the licensee and shall be reported to the Agency within twelve months from the date of grant of this licence. This testing shall be carried out by the licensee at least once every three years thereafter and reported to the Agency on each occasion as part of the AER. A written

record of all integrity tests and any maintenance or remedial work arising from them shall be maintained by the licensee.

4.7.6 All tanks and containers shall be labelled to clearly indicate their contents.

4.8. Specified Engineering Works

4.8.1 The licensee shall submit written proposals for all Specified Engineering Works, as defined in *Schedule D: Specified Engineering Works*, to the Agency for its agreement prior to any such works being carried out. No such works shall be carried out without the prior agreement of the Agency.

4.8.2 All specified engineering works shall be supervised by a competent person(s) agreed in advance by the Agency and that person, or persons, shall be present at all times during which relevant works are being undertaken.

4.8.3 Following the completion of all specified engineering works, the licensee shall complete a construction quality assurance validation report. The validation report shall be made available to the Agency on request. The report shall include the following information:

- (a) a description of the works;
- (b) as-built drawings of the works;
- (c) records and results of all tests carried out (including failures);
- (d) where relevant a drawing and sections showing the location of all samples and tests carried out;
- (e) daily record sheets/diary;
- (f) name(s) of contractor(s)/individual(s) responsible for undertaking the engineering works;
- (g) name(s) of individual(s) responsible for supervision of works and for quality assurance validation of works;
- (h) records of any problems and the remedial works carried out; and
- (i) any other information requested in writing by the Agency.

Reason: To provide for the protection of the environment

Condition 5 WASTE ACCEPTANCE AND HANDLING

5.1. The quantity and types of waste to be accepted at the facility shall not exceed 7,000 tonnes per annum as listed in *Schedule G: Waste Acceptance* unless otherwise agreed in advance with the Agency.

5.2. Waste may only be accepted at the facility between the hours of 08:00 and 19:00, Monday to Saturday inclusive unless otherwise agreed in advance with the Agency.

5.3. (a) Lead acid batteries may be shredded, crushed and compacted at the facility as detailed in Attachment D.2 of the application, submitted with correspondence dated 22/12/99.

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- (b) Other wet cell batteries (including wet cell nickel cadmium batteries) may be drained of electrolyte prior to storage of the drained cells pending recovery or disposal.
- (c) All other batteries shall be stored pending recovery or disposal.
- 5.4. No waste shall be stored at the facility in other than designated storage areas illustrated on drawing number RTB 004 (dated 1/9/99) or as otherwise agreed with the Agency. The designated storage areas shall be marked on the floor or otherwise delineated within nine months of the date of grant of this licence.
- 5.5. No wet cell batteries or their components (including liquid waste) shall be stored at the facility for longer than six months unless otherwise agreed with the Agency. No dry cell batteries shall be stored at the facility for longer than twelve months unless otherwise agreed with the Agency.
- 5.6. Any waste deemed unsuitable for processing or acceptance at the facility shall be immediately separated, stored in a designated quarantine area and at the earliest possible time removed from the facility. The designated quarantine area shall be illustrated on a revised drawing number RTB 004 to be submitted to the Agency for agreement within six months of the date of grant of this licence.
- 5.7. Liquid wastes stored or generated at the facility shall be stored in dedicated tanks or containers. No mixing of different liquid wastes shall take place without the prior agreement of the Agency.
- 5.8. A mechanism to prevent overfilling shall be maintained to the satisfaction of the Agency on each liquid waste storage tank.
- 5.9. The licensee shall within twelve months of the date of grant of this licence investigate the possibility of neutralising battery electrolyte at the facility. A report on the investigation, including conclusions drawn and recommendations shall be submitted as part of the EMP for the agreement of the Agency.
- 5.10. Lead acid and other wet cell batteries shall only be accepted at the facility in containers owned or controlled by the licensee. Each such container accepted at the facility shall be uniquely identifiable by visual and/or electronic means. The off-site location of each container shall be recorded. Each container shall be clean and free of defects and damage prior to dispatch from the facility. Each container shall be constructed of a suitable chemical resistant material.
- 5.11. All containers accepted at the facility shall be whole and sound. Any leaking or otherwise ruptured containers shall immediately be overdrummed or the contents transferred to a sound container in a manner which will not adversely affect the environment.
- 5.12. Subject to Condition 7.7, all spillages of liquid waste shall be cleaned up so as to prevent spilled fluid draining to sewer or flowing beyond the boundary of the licensed facility and in any case so as not to adversely affect the environment.
- 5.13. All waste removed off-site for recovery or disposal shall only be conveyed by an authorised contractor, as agreed with the Agency, and shall be transported from the facility in a manner which will not adversely affect the environment.
- 5.14. All waste removed off-site shall only be conveyed to an appropriate facility, as agreed with the Agency, for the purpose of recovery or disposal.

Reason: To provide for the acceptance and management of wastes authorised under this waste licence

Condition 6 ENVIRONMENTAL NUISANCES

- 6.1. The licensee shall, at a minimum of one-week intervals, inspect the facility and its immediate surrounds for nuisances caused by vermin and odours. Written records shall be maintained of all inspections and any actions taken as a result of these inspections.
- 6.2. The road network in the vicinity of the facility shall be kept free from any debris caused by vehicles entering or leaving the facility. Any such debris or deposited materials shall be removed without delay.
- 6.3. The licensee shall ensure that all vehicles delivering waste to or removing waste from the facility are fully enclosed and clean and shall not give rise to any nuisance.
- 6.4. The licensee shall ensure that vermin do not give rise to nuisance at the facility or the immediate environment of the facility.
- 6.5. All loose litter accumulated within the facility and its environs shall be removed and appropriately disposed of on a daily basis.

Reason: To provide for the control of nuisances.

Condition 7 EMISSIONS AND ENVIRONMENTAL IMPACTS

- 7.1. No specified emission from the facility shall exceed the emission limit values set out in *Schedule F: Emission Limits*. There shall be no other emissions of environmental significance.
- 7.2. All treatment, abatement and emission control equipment shall be calibrated and maintained, in accordance with the instructions supplied by the manufacturer/supplier or installer. Written records of the calibrations and maintenance shall be made and kept by the licensee.
- 7.3. The licensee shall ensure that the activities shall be carried out in a manner such that emissions, noise or odours do not result in significant impairment of, or significant interference with, amenities or the environment beyond the facility boundary. There shall be no clearly audible tonal or impulsive component in the noise emissions from the facility at the facility boundary.
- 7.4. No potentially polluting substance or matter shall be permitted to discharge to ground or groundwater.
- 7.5. Emissions to atmosphere
 - 7.5.1 The licensee shall submit within six months of the date of grant of this licence a proposal for the agreement of the Agency to enclose the shredding operation and to extract air from the enclosure. Air dispersion modeling shall be carried out on the proposed air emissions and reported upon in the proposal. A timescale for implementation of the work shall be included in the proposal.
 - 7.5.2 Emissions to atmosphere shall only be made at location A1, the location of which shall be agreed with the Agency in accordance with condition 7.5.1.

7.5.3 Emission limit values to atmosphere in this licence shall be interpreted in the following way:

For non-continuous monitoring:

- (a) For any parameter where, due to sampling/analytical limitations, a 30 minute sample is inappropriate, a suitable sampling period should be employed and the value obtained therein shall not exceed the emission limit value.
- (b) For all other parameters, no 30-minute mean value shall exceed the emission limit value.

7.5.4 The concentration limits for emissions to atmosphere specified in this licence shall be achieved without the introduction of dilution air and shall be based on gas volumes under standard conditions of:

Temperature 273K, pressure 101.3kPa (no correction for water vapour content).

7.6. Trade effluent emissions to sewer

7.6.1 No trade effluent emission to sewer shall exceed the emission limit values set out in *Schedule F.2: Emissions to Sewer*, except as otherwise agreed with the Sanitary Authority and with the Agency.

7.6.2 No substance shall be present in such concentrations as would constitute a danger to sewer maintenance personnel working in the sewerage system, or as would be damaging to the fabric of the sewer, or as would interfere with the biological functioning of a downstream wastewater treatment works.

7.6.3 The licensee shall permit authorised persons of the Sanitary Authority to inspect, examine and test, at all reasonable times, any works or apparatus installed in connection with the discharge or emission and to take samples of the discharge or emission.

7.6.4 No discharge or emission to sewer shall take place which gives rise to any reaction within the sewer or to the liberation of by-products which may be of environmental significance.

7.6.5 The licensee shall ensure that the discharge shall not contain dissolved methane, petroleum spirits or organic solvents (including chlorinated organic solvents) at concentrations which would give rise to flammable or explosive vapours in the sewer.

7.6.6 The licensee shall submit monitoring results to the Sanitary Authority on a quarterly basis.

7.6.7 The licensee shall submit within six months of the date of grant of this licence a proposal for the agreement of the Agency to reduce water usage at the facility and to reduce the discharge of lead to sewer. The proposal shall include a timescale for implementation of proposed measures.

7.7. Non-trade effluent wastewater (e.g. fire water, accidental spillage) which occurs on site shall not be discharged to the sewer without the prior authorisation of the Sanitary Authority. The Agency shall be notified of such an event.

Reason: To control emissions from the facility and provide for the protection of the environment

Condition 8 DECOMMISSIONING AND AFTERCARE

- 8.1. Within eighteen months of the date of grant of this licence, the licensee shall submit to the Agency for agreement a Decommissioning and Aftercare Plan for the facility. The licensee shall update this plan when required in writing by the Agency and submit proposed amendments to the Agency for its agreement.

Reason: To provide for decommissioning of the facility and aftercare of the site on which the facility is located.

Condition 9 ENVIRONMENTAL MONITORING

- 9.1. The licensee shall carry out such monitoring and at such locations and frequencies as set out in *Schedule E: Monitoring* and as specified in the Conditions of this licence.
- 9.2. The licensee shall provide safe and permanent access to all on-site sampling and monitoring points and off-site points as required by the Agency.
- 9.3. The licensee shall maintain all sampling and monitoring points, and clearly label and name (including national grid number) all sampling and monitoring locations, so that they may be used for the representative sampling and monitoring of emissions from the facility.
- 9.4. Monitoring and analysis equipment shall be operated and maintained in accordance with the manufacturer's instructions (if any) so that all monitoring results accurately reflect any emission or discharge or other environmental parameter.
- 9.5. The licensee shall amend the frequency, locations, methods and scope of monitoring, sampling, analyses and investigations only upon the written instruction of the Agency and shall provide such information concerning such amendments as may be requested in writing by the Agency. Such alterations shall be carried out within any timescale nominated by the Agency.
- 9.6. Unless otherwise agreed in writing with the Agency, a written record shall be kept of the names, qualifications and a summary of relevant experience of all persons who carry out any sampling and monitoring as required by this licence and who carry out the interpretation of the results of such sampling and monitoring.
- 9.7. The monitoring of noise shall be undertaken at two locations, B1 and B2, the location of which shall be agreed with the Agency prior to monitoring taking place.
- 9.8. The monitoring of the trade effluent emission to sewer shall be undertaken at location S1, the location of which shall be agreed with the Agency prior to monitoring taking place.

Reason: To ensure compliance with the requirements of other conditions of this licence by provision of a satisfactory system of measurement and monitoring of emissions

Condition 10 CONTINGENCY ARRANGEMENTS

- 10.1. The licensee shall, within six months from the date of grant of this licence, submit a written Emergency Response Procedure (ERP) to the Agency for its agreement. The ERP shall address any emergency situation which may originate on the facility and shall include provision for minimising the effects of any emergency on the environment.

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- 10.2. The licensee shall have in storage an adequate supply of containment booms and/or suitable absorbent material to contain and absorb any spillage at the facility. Once used the absorbent material shall be disposed of in an appropriate manner.
- 10.3. All significant spillages occurring at the facility shall be treated as an emergency and immediately cleaned up and dealt with so as to alleviate their effects.
- 10.4. No waste shall be burnt within the boundaries of the facility. A fire at the facility shall be treated as an emergency. Immediate action shall be taken to extinguish it and the appropriate authorities notified.
- 10.5. The licensee shall carry out a risk assessment to determine the requirements at the facility for fire fighting and firewater retention facilities and, within six months from the date of grant of this licence, submit a report, including recommendations, on the risk assessment to the Agency for its agreement. The Chief Fire Officer of Kildare County Council shall be consulted by the licensee during this assessment.
- 10.6. Unless otherwise notified in writing by the Agency, in the event that any monitoring, sampling, complaints or observations indicate that an incident has, or may have, taken place, the licensee shall immediately:
- (a) identify the date, time and place of the incident;
 - (b) carry out an immediate investigation to identify the nature, source and cause of the incident and any emission;
 - (c) isolate the source of the emission;
 - (d) evaluate the environmental pollution, if any, caused by the incident;
 - (e) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
 - (f) provide a proposal to the Agency for its agreement within one month to:
 - i) identify and put in place measures to avoid recurrence of the incident; and
 - ii) identify and put in place any other appropriate remedial action.

Reason: To provide for the protection of the environment.

Condition 11 CHARGES AND FINANCIAL PROVISIONS

11.1. Agency charges

- 11.1.1. The licensee shall pay to the Agency an annual contribution of £3,501.00 or such sum as the Agency from time to time determines, towards the cost of monitoring the activity or otherwise in performing any functions in relation to the activity, as the Agency considers necessary for the performance of its functions under the Waste Management Act, 1996. The licensee shall in 2001 and subsequent years, not later than January 31 of each year, pay to the Agency this amount updated in accordance with changes in the Public Sector Average Earnings Index from the date of the grant of the licence to the renewal date. The updated amount shall be notified to the licensee by the Agency. For 2000, the licensee shall pay a pro rata amount from the date of grant of this licence to 31st December 2000. This amount shall be paid to the Agency within one month from the date of grant of this licence.

11.1.2. In the event that the frequency or extent of monitoring or other functions carried out by the Agency needs to be increased or decreased the licensee shall contribute such sums as determined by the Agency to defraying its costs.

11.2. Environmental Liabilities

11.2.1. The licensee shall arrange for the completion of a comprehensive and fully costed Environmental Liabilities Risk Assessment for the facility which will address liabilities arising from the carrying on of the activities to which this licence relates. A report on this assessment shall be submitted to the Agency for agreement within six months of date of grant of this licence.

11.2.2. Within nine months of the date of grant of this licence, the licensee shall make a Proposal for Financial Provision to the Agency for its agreement to cover any liabilities incurred by the licensee in carrying on the activities to which this licence relates. Such provision shall be maintained unless otherwise agreed in writing by the Agency.

11.2.3. The amount of financial provision, held under Condition 11.2.2 shall be reviewed and revised as necessary, but at least annually. Any proposal for such a revision shall be submitted to the Agency for its agreement.

11.2.4. The licensee shall within two weeks of purchase, renewal or revision of the financial provision required under Condition 11.2.2, forward to the Agency written proof of such indemnity.

11.3. Sewerage charges

11.3.1. Sewerage charges as determined by the Sanitary Authority shall be paid to the appropriate body. Charges are subject to price variation in the future as may be ordered by the Sanitary Authority.

Reason: To provide for adequate financing for monitoring and financial provisions for measures to protect the environment.

Schedule A Content of the Environmental Management Programme

Environmental Management Programme

Details of Operator

Name and Address of operator and site. Included should be contact names in respect of persons with managerial responsibility for site operations, including the facility manager. Relevant telephone numbers should also be given. All relevant drawings should be included in the EMP.

Types of Waste Accepted

A detailed description of the types of waste that can be accepted at the facility.

Quantity of Wastes Accepted

Details should be given on the annual quantity of waste taken into the facility.

Engineering Details

Details of all significant site engineering works should be included. Where applicable the information should cover:

- offices, stores etc.
- site infrastructure etc.

Operational Matters

These should include:

- description of the operations
- measures for the control of environmental nuisances
- measures for the control of emissions
- site opening and operating times
- access control
- waste acceptance procedures
- procedures for dealing with unacceptable wastes
- procedure for overdrumming or transferring the contents of leaking or otherwise ruptured containers
- procedure for the removal of unacceptable waste
- equipment to be utilised
- site personnel, including qualifications, duties and responsibilities
- monitoring and maintenance procedures
- trigger levels for emissions
- operational and safety rules (including safety statement)
- emergency procedures

Objectives and Targets

Timescale for achieving the objectives and targets listed in the Schedule of Objectives and Targets

Designation of Responsibility for Achieving Targets and Objectives

Options for the recovery of batteries currently disposed of

Report on the possibility of on-site neutralisation of battery electrolyte

Other items specified by the Agency



Schedule B Content of the Annual Environmental Report

Annual Environmental Report Content

Reporting Period.

Waste activities carried out at the facility.

Quantity and composition of waste received, disposed of and recovered during the reporting period and each previous year.

Summary report on emissions.

Summary of results and interpretations of environmental monitoring, including plans of all monitoring locations including 12-digit grid references.

Resource and energy consumption summary.

Proposed development of the site and timescale of such development.

Report on development works undertaken during the reporting period and those proposed during the coming year.

Estimated annual and cumulative quantity of indirect emissions to groundwater.

Schedule of Environmental Objectives and Targets for the forthcoming year.

Report on the progress towards achievement of the Environmental Objectives and Targets contained in the previous year's report.

Full title and written summary of any procedures developed by the licensee in the year which relates to the facility operation.

Environmental Management Programme - Report and Proposal.

Environmental Objectives and Targets for the Forthcoming Year - Report and Proposal.

Full title and a written summary of any procedures developed by the licensee in the year which relates to the operation of the facility.

Tank, pipeline and bund testing and inspection report.

Reported incidents and complaints summary.

Report on financial provision made under this licence, management and staffing structure of the facility, and a programme for public information.

Use of the quarantine store for rejected waste.

Total quantity of lead (in kilograms) discharged to sewer during the reporting period.

Any other items specified by the Agency.



Schedule C Recording and Reporting to the Agency

Table C.1 Recurring Reports

Report	Reporting Frequency (Note 1)	Report Submission Date
Environmental Management System Updates	Annually	One month after the end of the year reported on.
Annual Environment Report (AER)	Annually	Thirteen months from the date of grant of licence and one month after the end of each year thereafter.
Record of Incidents	As they occur	Within five days of the incident.
Specified Engineering Works reports	As they arise	Prior to the works commencing.
Bund, tank and container integrity assessment	3 yearly	Twelve months from the date of grant of licence and one month after end of the year being reported on.
Underground pipe and tank integrity assessment	5 yearly	Eighteen months from the date of grant of licence and one month after end of the year being reported on.
Noise monitoring	Annually	One month after end of the year being reported on.
Air emissions monitoring	Annually	One month after end of the year being reported on.
Trade effluent discharge monitoring	Annually	One month after end of the year being reported on.

Note 1: Unless altered at the request of the Agency.



Schedule D Specified Engineering Works

Table D.1 Specified Engineering Works

Specified Engineering Works
Development of waste processing capacity.
Development of waste storage capacity.
Any works notified in writing by the Agency.



Schedule E Monitoring

Monitoring to be carried out as specified below. All monitoring and analyses shall be carried out by competent practitioners and in competent laboratories to be agreed with the Agency in advance.

E.1: Monitoring of noise

Noise monitoring point reference numbers: **B1** and **B2**.

Table E.1.1 Noise monitoring

Parameter	Monitoring frequency	Analysis method or technique
L(A) _{EQ} [30 minutes]	Annually	Standard ^{Note 1}
L(A) ₁₀ [30 minutes]	“	“
L(A) ₉₀ [30 minutes]	“	“
Frequency analysis (1/3 octave band analysis)	“	“

Note 1: International Standards Organisation. ISO 1996. Acoustics - Description and Measurement of Environmental Noise. Parts 1, 2 and 3.

E.2: Monitoring of air emission

Air emission monitoring point reference number: **A1**

Table E.2.1 Monitoring of Air Emission

Parameter	Monitoring frequency	Analysis method or technique
Lead	bi-annually ^{Note 1}	standard method ^{Note 2}

Note 1: Monitoring must occur during periods of maximum potential discharge. Production records should be available to demonstrate that gas sampling took place during periods of maximum loading, i.e. during the shredding of lead acid batteries.

Note 2: Sampling and analytical techniques must be based on standard methods which have been demonstrated as suitable for the measurement of the target substances.

E.3: Monitoring of trade effluent discharge to sewer

Trade effluent discharge monitoring point reference number: **S1**.

Table E.3.1 Trade effluent monitoring

Parameter	Monitoring frequency	Analysis method or technique
pH	daily	Standard method ^{Note1}
Temperature	weekly	Standard method ^{Note1}
Lead	bi-annually	Standard method ^{Note1}
Ammoniacal nitrogen	bi-annually	Standard method ^{Note1}
Sulphates (as SO ₄)	bi-annually	Standard method ^{Note1}

Note 1: Sampling and analytical techniques must be based on standard methods which have been demonstrated as suitable for the measurement of the target substances.



Schedule F Emission Limits

F.1 Emissions to Air

Monitoring point: A1

Table F.1 Emission limit value for emissions to air at monitoring point A1

Parameter	Emission limit value	
Lead	Until three years from the date of grant of this licence	5 mg/m ³ (for mass emissions >25g/h of this compound)
	From three years from the date of grant of this licence	2 mg/m ³

F.2 Emissions to Sewer

Monitoring point: S1

Volume to be emitted:

Maximum in any one day: 5 m³

Maximum in any one week: 20 m³

Table F.2 Emission limit values for emissions to sewer at monitoring point S1

Parameter	Emission limit value
pH	6-9
Temperature	22°C
Lead	18 mg/l
Ammoniacal nitrogen	60 mg/l
Sulphates (as SO ₄)	300 mg/l



Schedule G Waste acceptance

Table G.1 Waste Categories and Quantities

Waste type	Maximum tonnes per annum
Batteries, including lead acid batteries, nickel cadmium batteries, nickel metal hydride batteries and batteries containing mercury, lithium, magnesium, chromium and silver.	7,000 tonnes



**Signed on behalf of the Agency:
on the 6th day of October 2000**

B. Sheehan Authorised Person