OFFICE OF LICENSING & GUIDANCE

INSPECTORS REPORT ON A LICENCE APPLICATION

TO:	Directors
FROM:	Niamh O' Donoghue **- Licensing Unit**
DATE:	10th May 2004
RE:	Application for a Waste Licence from Irish Bulk Liquid Storage Ltd, Licence Register 193-1

Application Details	
Type of facility:	Hazardous Waste Transfer Station.
Class(es) of Activity (**P** = principal activity):	*3rd Schedule*: Class 11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule. 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. *4th Schedule:* Class 1. Solvent reclamation or regeneration. Class 3. Recycling or reclamation of metals and metal compounds. Class 4 Recycling or reclamation of other inorganic materials. Class 8 Oil refining or other reuses of oil. **Class 13 (P).** 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.
Quantity of waste managed per annum:	24,000 tpa
Classes of Waste:	Hazardous commercial & industrial wastes.
Location of facility:	Foynes Harbour, Foynes, Co. Limerick,
Licence application received:	23rd September 2003
Third Party submissions:	Three
EIS Required:	Yes - compliant
Article 14 Notices sent:	26th November 03, 07th January 04
Article 14 compliance date:	24 March 2004
Article 16 Notices sent:	3rd February 2004
Article 16 Compliance date:	10th May 2004
Site Inspection:	20th November 2003

1. Facility

Irish Bulk Liquid Storage Ltd has applied to operate a Hazardous Waste Transfer Station at Foynes Co. Limerick. IBLS is a wholly owned subsidiary of Simon Storage Ltd, an independent operator of bulk liquid and gas storage in Great Britain and Ireland. IBLS (known as Estuary Fuels from 1975-7) has operated on a 1.5ha site since 1977 as a bulk chemical and oil storage terminal and will continue this activity alongside the transfer station operation. It holds a license (Ref. No.3), issued under the Dangerous Substances (Petroleum Bulk Stores) Regulations, 1979, by the Foynes Port, The HSA is the competent Authority.

The facility is located in the port of Foynes. The site and surrounds are situated on land reclaimed from the estuary during the 1950's and 1960's. The infrastructure consists mainly of 13 storage tanks, a firewater pump house, weighbridge and associated loading and offloading gantries and pipelines. The surrounding land use is a mix of light commercial and industrial. The site holds planning permission from Limerick County Council (Ref No. 99/2672) who has affirmed that additional planning permission is not required for the proposed development.

IBLS estimates that between 3-5 people will be employed at the facility. To date the only significant environmental incident was a spill of gas oil in 1989 within Bund A.

The applicant proposes to operate the facility six days a week, between 08.00 and 20.00 Monday to Saturday. However, during shipping operations due to various factors including tides, traffic in the port and arrival times from overseas operational hours will be 24 hours a day seven days a week. For this reason and the location of the site in a port facility it is not proposed to impose limitations on the hours of operation in the PD.

2. Operational Description

The site consists of 13 storage tanks, with four tanks in Bund A (1013m^3, 1992m^3, 3490m^3 and 1404m^3) and nine in Bund B (557m^3, 2x730m^3, 559m^3, 2x288m^3, 3x729m^3). All activities relating to the hazardous waste transfer operations will only make use of facilities in Bund B. Three tanks will be used for blending (559m^3 and 2x288m^3) and three tanks for bulk storage (730m^3, 557m^3 and 729m^3). Total bund capacity in Bund B is 1,700m^3. Waste, which has been pre-characterised and sampled will be delivered on site from road tankers, weighed and documentation checked. It will then transfer to the loading gantry where a confirmatory sample will be taken and tested. Following compatibility testing suitable waste will be offloaded and blended prior to bulk storage pending shipment.

IBLS Ltd. proposes to accept a total of 24,000 tonnes of hazardous waste per annum. This will consist of wastes from organic chemical processes (23,000 tonnes), inorganic chemical processes (200 tonnes), petroleum refining, natural gas purification and pyrolytic treatment of coal (200 tonnes), waste oil (100 tonnes), agrochemical wastes (100 tonnes), photographic processing waste (100 tonnes), waste from removal of paint, varnish and other coatings (100 tonnes), wastes from off-site water treatment plants (100 tonnes), and wastes from the chemical surface treatment and coating of metals and other materials (100 tonnes).

The export pipeline from the IBLS facility to the jetty is over ground owned by the Shannon Foynes Port Company. IBLS received a letter of agreement from the Port Company for the use of the pipeline for the transfer of wastes and also stating that IBLS are responsible for uncontrolled releases from the export pipeline.

3. Use of Resources

- Electricity: The yearly use is put at 150,000 kWh.

- Water: The largest usage of water on site will be for internal cleaning of waste delivery trucks estimated at 1000 litres per truck, 24 trucks per week.

4. Emissions

4.1 Air

Potential emissions to air on site arise from volatile organic compounds (VOC's) and odour. Sources of odour could arise from malodorous loads and mixing of incompatible wastes. Condition 5.3.3 requires a detailed procedure for the carrying out of compatibility tests to be submitted to the Agency prior to the commencement of waste transfer activities and Condition 5.3.1 does not allow for waste to be accepted on site prior to pre-sampling and characterisation. The PD prohibits odour causing a nuisance on site or in the immediate area of the facility and requires daily inspection and recording at the facility and its surrounds to ensure compliance.

The primary sources of fugitive VOC's emissions at the facility arise from both the tanks and loading and off-loading operations. The proposed waste storage tanks all vent to air at present. Condition 3.10.7 requires the installation of vapour collection/treatment technology prior to the commencement of waste transfer activities. The provision of this technology is recommended as BAT in the second draft BREF Document on Emissions from Storage. The existing facility handles virgin solvents; IBLS has procedures in place for tanker offloading and ship loading to ensure minimisation of fugitive emissions. VOC monitoring was carried out at one location on site and concentrations assessed on approximately 8-hour averages over 2 days. The results indicate that total VOC concentration at the site is below 20µg/m^3VOC. The PD requires biannual monitoring for VOC's.

4.2 Emissions to Drainage Pipe

Surface water run-off from the new and existing roads, paved parking area, and roof water from the laboratory and offices will discharge to the drainage system of the Port Authority. All drainage from the areas on site in which the waste transfer activities will occur is directed to a three stage separator north of Bund A. Condition 3.11.2 requires the installation of a continuous TOC monitor linked to a shut-off value. Condition 3.11.3 requires that normal levels of TOC at the discharge point be established over the 12 months following commencement of the licence and Condition 3.11.4(b) states that the discharge is shut off if contamination is indicated. Condition 5.3.9 of the PD states that all tanker washings are sent for blending. Sanitary effluent from the offices in treated in a settlement tank prior to connection to the site drainage system as it leaves the site. The site drainage pipe connects to the drainage pipe serving the Port, which is owned by the Port Authority and outfalls to the estuary without treatment. Condition 6.5 requires permission for use of the drainage pipe to be obtained from the Port Authority prior to the commencement of waste activity. As this discharge is of uncontaminated surface water no emission limit values have been set.

4.3 Surface Waters:

There will be no direct sources of emissions to surface water at the facility.

4.4 Storm Water Runoff:

All waste activities will be carried out on paved areas drainage from which is directed to a three stage interceptor. IBLS commissioned external consulting engineers (B C & T

Consultants Ltd) to assess the condition of Bunds A and B and their report was submitted to the Agency. The findings are discussed below.

Bund A

The walls are capable of carrying the loading from a spillage up to the full height of the wall however; the wall height is insufficient to contain the capacity of the largest tank. There are some cracks, blowholes and exposed steel that require repair and there are some defects in the integrity of the joints. There is also a possible case of carbonation in one location. The bund lacks a concrete floor or membrane and cannot be considered impervious.

Bund B

The design strength is not sufficient to withstand the thrust of a spillage to the top of the wall (1.44m) but can to a height of 1m, which would still give a capacity greater than 110% of the largest tank. The joints require repair and at present could allow penetration. Areas of exposed aggregate could also impair its ability to retain spillages. There are cracks and other defects in the walls. The floor due to the present of cracks, and areas where the floor has sunk can no longer be considered impervious.

The company relies on these bunds for the protection of ground, groundwater, surface water, and the candidate SAC the lower River Shannon that extends 120km along the Shannon Valley, passing the proposed new facility. IBLS also proposes to rely on the bunds for firewater retention. It is considered that adequate environmental protection could not be given if the time frame of 5 years, which the company proposes to bring the bunds up to standard, is allowed. Condition 3.10.1 of the PD therefore requires the bunds upgraded and rendered impervious *prior* to the commencement of waste transfer activities, the details of which must be submitted to the Agency for approval at least two months prior to commencement of the waste activity. EPA guidelines on capacity requirements apply. All drainage from bunded areas shall be diverted for collection and safe disposal.

Firewater Retention

At present IBLS propose to use the bunds around the drum and tank storage areas for firewater retention. Surface water runoff to drains from the areas associated with the waste transfer activities will be controlled via a shut-off value after the oil-interceptor. The risk assessment submitted indicated the bund capacity would be capable of holding fire water generated. A more comprehensive assessment is requested in Condition 9.6 of the license requiring the company to carry out a risk assessment of the need to have a dedicated firewater retention facility, and submit it to the Agency three months prior to the commencement of activities. Regard to the Agency's guidelines in carrying out this assessment is required.

4.5 Groundwater:

The bedrock aquifer beneath the site is a locally important aquifer, which is moderately productive only in local zones. The bedrock aquifer to the west of the facility is considered a poor aquifer generally unproductive except for local zones. Within a 2km radius there are nine wells, those classified are all of poor yield.

An assessment of the groundwater quality at the facility included the installation of four groundwater-monitoring wells. The range of parameters analysed for was based on the materials currently and historically handled at the facility. These included VOC's, semi-VOC's (SVOC), petrol range organics, diesel range organics, mineral oil metals, anions, alkalinity and hardness. The results were measured against the Interim Guideline Values (IGV's) for groundwater quality published by the Agency in "Towards Setting Guideline Values For Protection of Groundwater In Ireland- Interim Report", May 2003. Elevated levels of hydrocarbons in the groundwater in both the subsoil and bedrock were found. They were identified as highly degraded diesel, which was linked to the historic release in 1989 in Bund A. The highest level (625µg/l) occurred in the well immediately adjacent of Bund A (MW-1). The other wells had levels of 27µg/l and 31µg/l. MW-3 also showed an elevated

level of mineral oil (25µg/l), the other three wells were all at<10µg/l. While no specific limit was set in the guidelines for these parameters, they were included in the limit for total hydrocarbons, which is 10µg/l.
With the exception of two compounds no VOC's or SVOC's were detected on site. Compounds detected were 2-methylnaphthlene at 1µg/l and tert-butyl methyl ether at 49µg/l. The bunds at present are not impervious; condition 3.10.1 requiring upgrade of the bunds has been discussed.
There will be no direct sources of emissions to ground or groundwater at the facility following commencement of waste transfer activities. Condition 3.5.3 requires all hardstanding areas to be impermeable and condition 3.7.3 ensures all drainage from waste inspection and quarantine areas will be directed to the site drainage system. The PD requires biannual groundwater monitoring at four locations.

4.6 Wastes Generated:

The facility itself will not generate any significant quantities of waste.

4.7 Noise:

The nearest noise sensitive location, a private residence, is located approximately 400m south of the facility. It is adjacent to the road and there are a number of other industrial facilities between it and IBLS. Daytime noise surveys were carried out in March 2003 at three boundary locations. The results indicated that the daytime limit of 55dB(A) was exceeded at all locations (59-61dB(A)L_{Aeq} 56-57dB(A)L_{Aeq} and 60-64dB(A)L_{Aeq}). The chief sources of noise were on-site vehicle movement, and an onsite pump; other contributors were off-site traffic on the nearby harbour road, activities in surrounding commercial sites, shipping yard and occasional aircraft.

Due to shipping operations being dependant on such factors as tides, traffic in the port and arrival times from overseas the operational hours are 24 hours a day seven days a week. This may result in the operation of a jetty export pump and compressor during night hours. The cumulative effect of both during night hours at the nearest noise sensitive location is forecast at 33 dB L_{Aeq}

The PD requires noise monitoring at noise sensitive locations to be agreed with the Agency annually. Emission limits are set in accordance with Agency guidelines.

4.8 Nuisance:

Due to the nature of the activities on site, litter, vermin, birds and pests are not predicted to cause a nuisance. On-site processes such as shot blasting tanks and gantry's to remove rust occurs 1-2 times per annum and gives rise to localised dust. Dust monitoring was carried out in November/December 2002 at four locations. Results for one location were elevated at (424mg/m^2/day) all other locations were between 157-204mg/m^2/day. This elevated level was attributed to shot blasting, which was occurring during the sampling period.

The PD requires that dust does not give rise to nuisance at the facility or in its immediate area and requires the weekly inspection of the facility for dust nuisance.

5. Environmental Impact

The proposed development will make use of the existing tank storage facilities at the site. Additional infrastructure will consist of a tanker wash down area, a spillage containment area, additional drainage and hard standing areas. The surrounding land use is a mix of light commercial and industrial, the development will not cause any additional environmental impact.

6. Cultural Heritage, Habitats & Protected Species

The lower River Shannon is a candidate SAC (site code 2165), which extends 120km along the Shannon Valley passing the proposed new facility and is the closest SAC. The eastern part of Foynes village lies in a proposed NHA (site code 435) covering the Shannon Estuary, south shore and stretches along the Shannon River to the east. A NHA (site code 2048) covering the Fergus Estuary and Inner Shannon North Shore is located approximately 4km north of the site. Herbertstown Fen on Stramus Island is located 2km northeast of Foynes and is a proposed NHA (site code436); Barrigone 4km southeast of Foynes is both a proposed NHA and cSAC (site code 432).

The development itself will result in no direct habitat loss or have a direct impact on any of the designated sites. It has the potential to impact off-site eco-systems as a result of secondary impacts. All accidental spills or leaks on site can be collected and treated except for ship loading operations where there is a risk of spills into the River Shannon. IBLS procedures 302 Loading of Ships and IBLS-711 Emergency Action Plan have been developed to minimise the volume of any spill. Condition 9.2 of the PD requires an Emergency Action procedure be in place which takes account of new activities on the site at least two months prior to the commencement of waste transfer activities. Condition 9.3 requires that a documented Accident Prevention Policy must be in place not later than two months prior to the commencement of activities. Both of these documents require annual reviews and updates. Condition 9.5 requires IBLS to have in storage an adequate supply of containment booms to contain and absorb any spillage in the jetty.

The IBLS facility is also a member of the Shannon Estuary Ports Anti-Pollution Team, which in conjunction with all appropriate authorities in the estuary has adopted a Marine Emergency Action Plan. In compliance with regulation 8 of the Seveso regulations IBLS has prepared a "Demonstration of Safe Operations" document to demonstrate that all necessary measures have been taken to prevent major accidents and minimise the effects on people and the environment. These plans together with the likely low volumes of waste that could enter the estuary and the dilution capacity available would aid in minimising the environmental effects any spill would have.

7. Waste Management Plans

The Mid West Regional Management Plan recommends that the management of hazardous waste be carried out in accordance with the National Hazardous Waste Management Plan. Limerick County Council Development Plan (1999-2004) categorised Foynes as a "Schedule Town" for which a separate development Plan is currently being developed. The development guidelines for the county plan will still apply. At present the only avenue for at least 41% of the waste solvent exported is disposal due to its low calorific value. IBLS proposed facility, which involves blending, would increase the recovery rate of this waste as it is intended to ship the blended solvents to steel and cement manufacturing plants as a fuel for use in kilns and furnaces.

8. Environmental Impact Statement

I have read and assessed the EIS and am satisfied that it complies with the EIA and Licensing Regulations.

9. Compliance with Directives/Regulations/BAT

The existing IBLS site is a lower-tier facility in respect of the "European Communities (Control of Accident Hazards Involving Dangerous Substances) Regulations, 2000"(Seveso Regulations). The effect of the proposed waste transfer facility on the current status is at

present under review by the Health & Safety Authority. The installation falls within the scope of category 5.1 of Annex I of the Council Directive 96/61/EC concerning integrated pollution prevention and control. The PD as recommended takes account of the requirements of the Directive. In assessing the application regard was taken of the draft BREF on Solvent Storage and Waste Treatment.

10. Fit & Proper Person Assessment

The applicant can be considered a fit and proper person for the purposes of the Act.

12. Submissions

There were three submission made in relation to this application.

12.1 Submission from Mid-Western Health Board

The MWHB makes five points in its submission

(i) *The MWHB is concerned about fugitive emissions affecting air quality.*

PD conditions to ensure that fugitive emissions do not affect air quality are in place. Condition 5.3.4 requires that all blending and mixing will be carried out inside the tanks as stated. Condition 3.10.7 requires the installation of suitable vapour collection/treatment technology prior to the commencement of waste transfer activities. Biannual monitoring of VOC levels at two locations on site is required. Loading and offloading of tankers and ships will be carried out in accordance will IBLS procedures to ensure minimisation of fugitive emission release.

(ii) *The MWHB is concerned about dust nuisance.*

The nature of the activities on site should not give rise to dust nuisance. Dust monitoring carried out in November/December 2002 indicated that results at one location were high ($424mg/m^2/day$) but this level was attributed to shot blasting, which was occurring during the sampling period. The PD requires the facility to be inspected weekly for nuisance caused by dust and that hardstanding areas are sprayed during dry weather to minimise airborne dust.

(iii) *The MWHB is concerned about noise.*

The nearest noise sensitive location, a private residence, is located approximately 400m south of the facility. The PD requires a limit of 55 dB(A) daytime and 45 dB(A) nightime at the nearest noise sensitive location.

(iv) *The MWHB is concerned about odour.*

Potential sources of odour as discussed earlier are malodorous loads and mixing of incompatible wastes. As stated PD conditions have been inserted to control odour and expressively does not allow it to cause a nuisance at or in the immediate area of the facility. As discussed Condition 3.10.7 requires the installation of vapour collection/treatment technology on the tanks prior to the commencement of waste transfer activities which will minimise any odour potential from the venting of the tanks.

(v) *The MWHB is concerned about ground and surface water contamination.*

There will be no direct emissions to surface or groundwater from the facility. Condition 3.10.1 requires all tank, tanker and drum storage areas rendered impervious to the materials stored therein prior to the commencement of waste transfer activities. Condition 3.12.5 requires all pipes and pipelines used during shipping operations to be pressure and leak tested prior to transfer operations. Condition 3.12.4 requires all over ground pipes, flanges and values are subject to weekly inspection.

12.2 Submission from Chemifloc Ltd.

Chemifloc made fifteen points in its submission

(i) Chemifloc make the point that although the application states that neighbouring companies were notified about the application, their facility is 50m from the IBLS site and received no notification.

IBLS are in compliance with Articles 5, 6, 7 and 8 (site and newspaper notices) of the Waste Management (Licensing) Regulations 2000, (SI No. 185 of 2000).

(ii) Chemifloc noted that the application stated that no indigenous bulking and blending facility exists in Ireland however Shannon Environmental Services have operated a bulking and blending facility for 5 years.

This point has been noted.

(*iii) Chemifloc felt that the VOC monitoring survey conducted was not representative as the sampling location was upwind of the prevailing winds at the west end of the site.*

The baseline survey for VOC's results indicate that total VOC concentration at the site is below 20µg/m^3. No information on wind direction during the two days of sampling was given in the report. As stated PD conditions and IBLS procedures to ensure minimisation of fugitive emission release are in place. PD requires biannual monitoring of VOC levels at two locations west and east end of the site.

(iv) Chemifloc were concerned that no boreholes had been drilled on site to check for groundwater contamination

As part of the Article 16 notice issued to the company an assessment of groundwater quality was requested both upgradient and downgradient of the site. Parameters assessed reflected the compounds stored on site. The results of this monitoring were discussed earlier in the report. The PD requires groundwater monitoring at 4 locations biannually.

(v) Chemifloc were concerned at the possible contamination of discharge to the sewer by VOC's and felt discharge should be subject to biological treatment prior to discharge.

As discussed earlier the PD requires all drum, tank and tanker storage areas to be bunded. All drainage from bunded areas shall be diverted for safe collection and disposal. In the event of a spillage on site shut off values will isolate the drainage system. Condition 3.11.2 sets TOC monitoring requirements as discussed. As no contaminated water entering the drainage system is permitted by the PD it is felt that biological treatment is not required.

(vi) Chemifloc are concerned that tanker washings would be sent to sewer and not for blending as stated in the application.

Condition 5.3.9 of the PD states that all tanker washings are sent for blending. A TOC meter continuously monitors discharge from the interceptor, which will detect any contamination.

(*vii) Chemifloc is concerned that there appears to be nothing in place to monitor discharges from surface water drains and bund water pump outs.*

Condition 3.10.3 requires all drainage from bunded areas diverted for safe collection and disposal. Surface water discharge to drainage system passes through a silt trap and oil interceptor, which is continuously monitored for TOC as discussed.

(viii) Chemifloc is 'bemused' at the inclusion of waste from photographic, inorganic chemical and surface treatment processes. They feel physiochemical treatment processes are the better treatment for such waste.

This point has been noted.

(*ix) Chemifloc is concerned that the inventory of laboratory hardware does not indicate the ability to conduct confirmatory testing of waste. They also express concern that the Chemist employed should be an organic chemist qualified to PhD level.*

IBLS have not yet purchased the equipment to conduct the confirmatory testing. Condition 5.3.3 requires the procedures for confirmatory testing be submitted to the Agency for approval at least two months prior to the commencement of waste activities. All equipment will be in place prior to commencement of waste transfer activities. The chemist position is as yet not filled. Prior to commencement of operations IBLS in accordance with the PD will be required to submit for approval to the Agency the relevant education, training and qualifications of all relevant staff. Personnel performing specifically assigned tasks shall be qualified for the task as per condition 2.1.3.

(*x) Chemifloc noted that there is no proposal for nitrogen blanketing of the tanks to mitigate against the hazard of explosion as a result of ethers, furans and other substances forming peroxides as a result of contact with air.*

In compliance with regulation 8 of the Seveso Regulations IBLS has prepared a "Demonstration of Safe Operations" document to demonstrate that all necessary measures have been taken to prevent major accidents and minimise the effects on people and the environment. This document will be reviewed considering the proposed waste operations and comes under the remit of the Health and Safety Authority. Condition 9.3 of the PD requires the licensee to have a documented Accident Prevention Policy is in place, which will address the hazards on-site, particularly in relation to the prevention of accidents with a possible impact on the environment.

(xi) Chemifloc wondered if the tanks would be vented to atmosphere untreated as no provision for atmospheric pollution prevention was given in the application.

The PD as previously discussed requires the provision of vapour collection/treatment technology.

(xii) Chemifloc noted the absence of any methodology for the checking of compatibility of wastes to ensure no exothermic, polymerisation, condensation or other unspecified reactions or gas emissions occur.

Condition 5.3.1 does not allow for waste to be accepted on site unless it has previously been characterised and a pre-sample submitted to IBLS. Condition 5.3.2 requires that waste acceptance procedures will be in accordance with the Agency guidelines; and shall meet any

applicable requirements of EU Council Decision 2003/33/EC on waste characterisation and testing. Condition 5.3.3 requires the compatibility procedure to include, as far as possible, the identification of any potentially abnormal, hazardous or unusual situations and procedures for dealing with these.

(xiii) Chemifloc expressed concerns at the adequacy of fire fighting equipment at the site given the types of waste stored and suggested that individual tanks should have drench systems.

The tanks in bund B where all waste transfer activities will occur are fitted with a tank deluge drenching system, capable of working at maximum capacity for one hour. Water is obtained from the firewater tank supplemented from the fire main coming from the off-site reservoir. The firewater pump house has three dedicated firewater pumps. The PD further requires that prior to commencement of operations IBLS shall update its Emergency Action Plan following consultation with the Fire Authority. As stated IBLS in accordance with the Seveso Regulations has prepared a "Demonstration of Safe Operation" document which will be reviewed and submitted to the Health and Safety Authority. The Fire Authority is the competent authority in relation to fire equipment etc.

(xiv) Chemifloc expressed concern that bulk tanks may contain substances, which could be corrosive and what precautions would be in place to ensure tanks integrity.

The PD condition 3.10.6 requires integrity and maintenance tests be carried out on all tanks and all necessary maintenance and remedial work arising be carried out as necessary.

(xv) Chemifloc queried what pollution prevention equipment would be used to reduce fugitive emissions of VOC's from road tanker unloading and ship loading.

Loading and offloading of tankers and ships will be carried out in accordance will IBLS procedures to ensure minimisation of fugitive emission release. The PD requires biannual monitoring of VOC levels at two locations on site.

12.3 Submission from the Heritage and Planning Division of the Department of Environment, Heritage and Local Government.

(i) *The Heritage and Planning Division recommended that all precautions must be in place to ensure that accidental spillages do not find their way to the Lower Shannon Estuary cSAC (site code 2165).*

All accidental spills or leaks on site will be collected and treated. Condition 3.7.3 requires all drainage from waste inspection and quarantine areas directed to a separator and Condition 3.10.5 requires all tank tanker inlet, outlet, vents, values and gauges must be within the bunded area. Condition 3.10.4 requires all sumps and other plant chambers from which spillage of environmentally significant materials might occur to be fitted with high level alarms. Additionally, Condition 9.5 requires the licensee to have in storage an adequate supply of containment booms and/or adsorbent material to contain and adsorb any spillage at the facility and jetty.

(ii) *The Heritage and Planning Division want to ensure that precautions against spillages reaching the cSAC include firewater.*

This issue has been previously addressed in Section 4.4.

(iii) *The Heritage and Planning Division want the area completely bunded.*

All waste activities will be carried out on paved areas drainage from which is directed to a three stage interceptor. All tanks are bunded. EPA guidelines on capacity requirements apply. Additionally, as stated Condition 3.10.5 requires all tank tanker inlet, outlet, vents, values and gauges must be within the bunded area. All drainage from bunded areas shall be diverted for collection and safe disposal.

(iv) *The Heritage and Planning Division want risk of spillages during offloading of ships to be adequately addressed.*

During ship loading operations there is a risk of spills into the River Shannon. IBLS procedure 302-Loading of Ships has been developed to protect as far as possible against any spill and IBLS-711 Emergency Action Plan has been developed to minimise the volume of any spill. As Discussed Condition 9.2 of the PD requires an Emergency Action procedure be in place and Condition 9.3 requires that a documented Accident Prevention Policy must be in place. Both of these documents require annual reviews and updates. Additionally, as stated Condition 9.5 requires the licensee to have in storage an adequate supply of containment booms and/or adsorbent material to contain and adsorb any spillage at the jetty.

13. Charges

The PD recommends an annual charge to cover Agency costs, which has been assessed by OEE.

14. Recommendation

I have considered all the documentation submitted in relation to this application and I am satisfied that the conditions set out in the PD will adequately address all emissions from the facility and will ensure that the carrying on of the activities in accordance with the conditions will not cause environmental pollution. I recommend that the Agency grant a licence subject to the conditions set out in the attached PD and for the reasons as drafted.

Signed

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Niamh O' Donoghue

Procedural Note

In the event that no objections are received to the Proposed Decision on the application, a licence will be granted in accordance with Section 43(1) of the Waste Management Acts 1996-2003.