



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

WASTE LICENCE
PROPOSED DECISION

Waste Licence
Register Number: 83-1
Applicant: Dempsey Drums Limited
Location of Facility: Lower Oriel Street, North Wall,
Dublin 1.

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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, the submission received from a third party 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 Dempsey Drums Limited, P.O. Box 3019, Lower Oriel Street, North Wall, Dublin 1 to carry on the waste activities listed below at Lower Oriel Street, North Wall, Dublin 1 subject to 11 No. 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.

*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.

Class 4: Recycling or reclamation of other inorganic materials.

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.

INTERPRETATION

Act	The Waste Management Act, 1996 (No. 10 of 1996).
Adequate lighting	20 lux measured at ground level.
AER	Annual Environmental Report
Aerosol	A suspension of solid or liquid particles in a gaseous medium.
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.
BATNEEC	Best Available Technology Not Entailing Excessive Cost as defined in section 5(2) of the Act.
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
Daytime	0800 hours to 2200 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 <i>Schedule G</i> .
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.
Fugitive emissions	Any emissions not in waste gases of volatile organic compounds into air, soil and water. They include uncaptured emissions released to the outside environment via windows, doors, vents and similar openings.
Hazardous waste	As defined in Section 4 (2) of the Act.
IBC	Intermediate bulk container
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.
Local authority	Dublin Corporation
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.
Night-time	2200 hours to 0800 hours
Recovery	As defined in Section 4 (4) of the Act.
Sanitary authority	Dublin Corporation
Specified emissions	Those emissions listed in <i>Schedule G</i> of this licence.
Specified engineering works	Those engineering works listed in <i>Schedule E</i> of this licence.
Stop list	A list of hazardous substances which is referred to in the additional information dated 5 August 1999 submitted as part of the waste licence application and which may be updated from time to time.

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.
Weekly	During all weeks of plant operation, and in the case of emissions, when emissions are taking place; with no more than one measurement in any one week.

Part II - CONDITIONS

Condition 1 SCOPE

- 1.1. The waste activities authorised by this licence are listed and described in *Schedule A: Waste Activities*. Waste activities at the facility shall be restricted to those listed in *Schedule A* and any restrictions set down therein.
- 1.2. Waste activities shall be restricted to the area of land outlined in red on drawing number 4 entitled "industrial packaging recycling building - process/site layout" submitted with Attachment B.2 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 twelve 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 2.8 below:

2.2. Schedule of Environmental Objectives and Targets

2.2.1 The licensee shall, within six 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 nine 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 B: 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 three 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 three 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:

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- (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 six 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 twelve 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 C: 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 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;
 - (b) any emission which does not comply with the requirements of this licence;
 - (c) any trigger level specified in this licence or in the EMS which is attained or exceeded;
 - (d) any malfunction of any environmental control system;
 - (e) any indication that contamination has, or may have, taken place;
 - (f) the cessation of waste activities at the facility for a period in excess of 28 days, and their recommencement;
 - (g) any occurrence with the potential for environmental pollution; and
 - (h) any emergency.
- 3.2. The written record of an incident as specified in Condition 3.1 shall include all aspects described in Condition 10.7(a) to (e).
- 3.3. Unless otherwise instructed in writing by the Agency, the licensee shall:
- (a) notify the Agency by telephone, and by facsimile if available, as soon as practicable and in any case not later than 10.00 am the following working day after the occurrence of any incident; and
 - (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.
- 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;

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- (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 to 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 D* to this licence.
- 3.7. In the event of any incident which relates to discharges to surface water, the licensee shall notify Dublin Corporation and the Eastern Regional Fisheries Board as soon as practicable by telephone and in writing (by facsimile if available) and in any case not later than 10:00am on the following working day after such an incident.
- 3.8. Unless otherwise agreed with the Agency, all documentation required to be maintained under this licence, shall be retained by the licensee.
- 3.9. 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.
- 3.10. 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; and
 - (d) all written procedures produced by the licensee which relate to the licensed activities.
- 3.11. 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 time and date of arrival or departure;
 - (b) the name of the carrier;
 - (c) the vehicle registration number;
 - (d) for incoming loads, the name of the producers and collectors of the waste as appropriate;
 - (e) a description of the waste load including the associated EWC codes;
 - (f) the quantity of waste, recorded in tonnes and the number and type of containers;
 - (g) the name of the person checking the load;

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- (h) 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;
 - (i) a consignment note number (including transfrontier shipment notification and movement/tracking form numbers, as appropriate);
 - (j) the destination of outgoing waste (including a facility name and waste licence or permit number as appropriate);
 - (k) written confirmation that consigned waste has reached its destination and/or has been subjected to the recovery or disposal process for which it was destined, as appropriate; and
 - (l) any other information which might be required from time to time by the Agency.

These records shall be kept for a period of not less than three years.

3.12. The licensee shall maintain a written record of all complaints 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 fencing and gates shall be installed and maintained as described in Attachment D.1a of the application.
 - 4.3.2 The licensee shall remedy any defect in the gates and/or fencing as follows:
 - (a) a temporary repair shall be made by the end of the working day; and,
 - (b) a repair to the standard of the original gates and/or fencing shall be undertaken within three working days or as otherwise agreed with the Agency.
 - 4.3.3 Gates shall be kept locked shut when the facility is 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 and chemical storage areas shall, as

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- a minimum be banded, 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 banded area
 - (b) 25% of the total volume of substance which could be stored within the banded area.
- 4.7.2 All drainage from banded areas shall be diverted for collection and safe disposal.
- 4.7.3 All inlets, outlets, vent pipes, valves and gauges must be within the banded area.
- 4.7.4 The integrity and water tightness of all the 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 six 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.
- 4.7.5 All tanks and containers shall be labelled to clearly indicate their contents.
- 4.8. The integrity and water tightness of all underground pipes and tanks and their resistance to penetration by water or other materials carried or stored therein shall be tested and demonstrated by the licensee and shall be reported to the Agency within six months from the date of grant of this licence. This testing shall be carried out by the licensee at least once every five 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.
- 4.9. All foul sewer gullies, drainage grids and manhole covers shall be painted with red squares. All surface water discharge gullies, drainage grids and manhole covers shall be painted with blue triangles. These colour codes shall be maintained so as to be visible at all times.
- 4.10. Traffic arrangements at the facility shall be such that the emergency services' vehicles shall have access to all parts of the facility at all times.
- 4.11. Specified Engineering Works
- 4.11.1 The licensee shall submit written proposals for all Specified Engineering Works, as defined in *Schedule E: 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.
 - 4.11.2 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.
 - 4.11.3 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;

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- (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. Except where prior agreement is received from the Agency, the following waste types only shall be accepted at the facility: drums, barrels, IBC's and other containers (hereafter generally referred to as containers).
- 5.2. The quantity of waste to be accepted at the facility shall not exceed 10,000 tonnes per annum unless otherwise agreed in advance with the Agency.
- 5.3. Waste acceptance criteria shall be as submitted with Attachment E.2 of the application or as otherwise agreed with the Agency.
- 5.4. No container shall be accepted at the facility which contains a volume of liquid in excess of 1% of the total capacity of that container.
- 5.5. No container shall be accepted at the facility whose previous contents are unknown and whose previous contents are not clearly displayed on a label.
- 5.6. The licensee shall maintain a "stop list" of hazardous substances as submitted with additional information dated 5 August 1999. All updated "stop lists" are to be forwarded to the Agency within 24 hours of their coming into use. No container shall be accepted at the facility whose previous contents are listed on the "stop list" except where that container has been decontaminated as set out on the list, and labelled as such, prior to arrival at the facility.
- 5.7. Waste may only be accepted and processed at the facility between the hours of 08:00 and 19:00, Monday to Saturday inclusive.
- 5.8. Except where prior agreement is received from the Agency, all containers accepted at the facility shall be reconditioned or recycled as detailed in Attachment D.2.d of the application.
- 5.9. Any waste deemed unsuitable for such processing and/or in contravention of this licence shall be immediately separated, stored in a designated quarantine area and at the earliest possible time removed from the facility. Within three months from the date of grant of this licence, the licensee shall submit a procedure for agreement with the Agency for the removal of unsuitable or unacceptable waste from the facility. Within three months from the date of grant of this licence, the licensee shall submit a report and drawing illustrating the designated quarantine area for agreement with the Agency.
- 5.10. No waste shall be stored at the facility in other than designated storage areas. Within three months from the date of grant of this licence, the licensee shall submit a report and drawing illustrating the designated waste storage areas for agreement with the Agency. In any case, no waste shall be stored at the facility for longer than six months.
- 5.11. Within three months from the date of grant of this licence, no container shall be drained of residues except where a written procedure is in place to ensure that incompatible substances are not mixed. The procedure shall be submitted for agreement with the Agency within two months of the date of grant of this licence.
- 5.12. Subject to Conditions 4.7, 5.9 and 5.10, appropriate arrangements shall be made for the storage of incompatible substances. The arrangements shall ensure that no mixing of incompatible substances, as a result of spillages or otherwise, shall take place.

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- 5.13. All containers accepted or handled 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. Within two months of the date of grant of this licence, a procedure for undertaking this activity shall be submitted to the Agency for its agreement.
 - 5.14. Subject to Condition 7.9, all spillages of waste shall be cleaned up so as to prevent spilled fluid draining to sewer and in any case so as not to adversely affect the environment.
 - 5.15. 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.
 - 5.16. No liquid waste, or container which has not been drained of residual liquids, shall be stored for a period in excess of 12 hours, or overnight, in the enclosed area beneath the railway line used for the processing of intermediate bulk containers. This enclosed area shall be actively ventilated. No other area beneath the railway line shall be used for the processing or storage of liquid waste.
 - 5.17. Within 12 months from the date of grant of this licence, no liquid waste, including residues contained in containers, shall be drained, processed or stored in the enclosed areas beneath the railway line.

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 offensive odours or other nuisance.
- 6.4. The licensee shall ensure that the activities shall be carried out in a manner such that odours do not result in significant impairment of, or significant interference with amenities or the environment beyond the facility boundary.
- 6.5. The licensee shall ensure that vermin do not give rise to nuisance at the facility or the immediate environment of the facility. Vermin control measures shall be as set out in Attachment F.9 of the waste licence application.
- 6.6. 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 G: 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 do not result in significant impairment of, or significant interference with, amenities or the environment beyond the facility boundary.
- 7.4. The licensee shall ensure that the activities shall be carried out in a manner such that noise does 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.
- 7.5. Emissions to atmosphere
- 7.5.1 Emission limit values to atmosphere in this licence shall be interpreted in the following way:
- 7.5.1.1 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.
 - (c) For flow, no hourly or daily mean shall exceed the relevant limit value.
 - (d) Mass flow thresholds refer to a rate of discharge expressed in units of kg/h, above which the concentration emission limit value applies. Mass flow threshold rates shall be determined on the basis of a single 30 minute measurement (i.e. the concentration determined as a 30 minute average shall be multiplied by an appropriate measurement of flow and the result shall be expressed in units of kg/h).
 - (e) Mass flow limits shall be calculated on the basis of the concentration, determined as an average over the specified period, multiplied by an appropriate measurement of flow. No value, so determined, shall exceed the mass flow limit value.
 - (f) At emission points A2 and A3, from 1 November 2007 and where annual solvent usage is greater than 5 tonnes, the average of all

the readings shall not exceed the emission limit value and no hourly average value shall exceed 1.5 times the emission limit.

At least three readings shall be obtained in each monitoring exercise.

- 7.5.2 The concentration limits for emission 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 oxygen or water content).

- 7.5.3 Emissions to atmosphere shall only be made at locations A1, A2 and A3 as illustrated on drawing no. 3, revision A, July 99.
- 7.5.4 From 1 November 2007, where solvent use as a result of the drum painting activity is greater than 5 tonnes per annum, fugitive emissions to air of volatile organic compounds arising as a result of drum painting shall be no more than 20% of total solvent input.
- 7.5.5 The licensee shall within twelve months of the date of grant of this licence submit a proposal to the Agency for its agreement for the identification and reduction of fugitive emissions to air.
- 7.5.6 Within three months of the date of grant of this licence, the licensee shall provide safe and permanent access to the sampling points at emission points A1, A2 and A3.
- 7.6. There shall be no direct emissions to groundwater. No potentially polluting substance or matter shall be permitted to discharge to ground or groundwater.
- 7.7. There shall be no trade effluent emissions to sewer.
- 7.8. Storm drainage
- 7.8.1 The licensee shall maintain fuel oil/sediment interceptors at each of the emission points SW1, SW2 and SW3. The interceptors shall be desludged as necessary and at least annually. A record of such desludging shall be maintained.
- 7.8.2 A visual inspection of the discharge at SW2 shall be carried out weekly. A log of such inspections shall be maintained.
- 7.8.3 No potentially polluting substance or matter shall be permitted to discharge to off-site surface waters or off-site storm drains.
- 7.8.4 In the event that any observations or analyses made on the quality or appearance of surface water run-off should indicate that contamination has taken place, the licensee shall:
- (a) carry out an immediate investigation to identify and isolate the source of the contamination;
 - (b) put in place measures to prevent further contamination and to minimise the effects of any contamination on the environment; and
 - (c) notify the Agency as soon as is practicable.

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- 7.8.5 Within three months of the date of grant of this licence, shut off valves shall be installed and maintained at emission points SW1, SW2 and SW3.
- 7.9. 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.
- 7.10. Within three months of the date of grant of this licence, the licensee shall provide safe and permanent access to the effluent as discharged to the sewer at the following locations:
- (a) at emission points SW1 and SW3 or at the combined discharge of SW1 and SW3; and
 - (b) at emission point SW2.
- 7.11. All automatic monitors and samplers shall be functioning at all times (except during maintenance and calibration) when the activity is being carried on unless alternative sampling or monitoring has been agreed in writing by the Agency for a limited period. In the event of the malfunction of any continuous monitor, the licensee shall contact the Agency as soon as practicable, and alternative sampling and monitoring facilities shall be put in place. Prior written agreement for the use of alternative equipment, other than in emergency situations, shall be obtained from the Agency.

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

Condition 8 DECOMMISSIONING AND AFTERCARE

- 8.1. Within six 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 F: 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. Monitoring and analysis equipment shall be operated and maintained in accordance with the manufacturers instructions (if any) so that all monitoring results accurately reflect any emission or discharge or other environmental parameter.
- 9.4. 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.
- 9.5. 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.
- 9.6. The licensee shall maintain all sampling and monitoring points so that they may be used for the representative sampling and monitoring of emissions from the facility.
- 9.7. The licensee shall, if so instructed by the Agency, carry out monitoring for the measurement of dust deposition at the facility. The monitoring method, frequency and reporting shall be as agreed with the Agency.
- 9.8. The location of the noise monitoring points shall be as per Attachment J.7 of the application and shall be illustrated on a site drawing to be submitted with the noise monitoring report. Twelve digit grid references shall be assigned to each monitoring point.
- 9.9. The licensee shall, not later than six months from the date of grant of this licence, submit to the Agency for its agreement proposals to investigate the extent, if any, of soil contamination at the facility. The investigation shall take place within six months of agreement on the proposals being reached. On completion of the investigation, a final report, including a risk assessment, recommendations and a programme, including timescales, for implementation of those recommendations, shall be submitted to the Agency for its agreement.

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.
- 10.2. Contingency arrangements for the facility shall be as detailed in Attachment K of the application.
- 10.3. 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.
- 10.4. 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.
- 10.5. 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.
- 10.6. The licensee shall carry out a risk assessment to determine the requirements at the facility for fire fighting and fire water 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. This assessment shall include an examination of the existing arrangements for storage of fire water. The Chief Fire Officer of Dublin Corporation shall be consulted by the licensee during this assessment.
- 10.7. Unless otherwise notified in writing by the Agency, in the case of repeat incidents, in the event that any monitoring, sampling 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 reoccurrence 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 £6,224.00 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 2000 and subsequent years, not later than January 31 of each year, pay to the Agency this amount updated in accordance with changes in the Consumer Price 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 1999, the licensee shall pay a pro rata amount from the date of grant of this licence to 31st December 1999. 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, 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 six 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.

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

SCHEDULE A Waste Activities

Activities authorised by the licence shall be restricted to those described below.

WASTE MANAGEMENT ACT, 1996: THIRD SCHEDULE Note 1

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 was produced:**

This activity is limited to the storage, pending disposal, of waste, other than hazardous waste.

Note 1: Any reference to an activity Class is to be taken as being from the Third Schedule of the Waste Management Act, 1996, unless otherwise stated.

WASTE MANAGEMENT ACT, 1996: FOURTH SCHEDULE Note 1

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

This activity is limited to the reconditioning and recycling of metal drums, barrels, IBC's and containers.

Class 4 **Recycling or reclamation of other inorganic materials.**

This activity is limited to the reconditioning and recycling of other drums, barrels, IBC's and containers.

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 was produced:**

This activity is limited to the storage, pending recovery, of waste.

Note 1: Any reference to an activity Class is to be taken as being from the Fourth Schedule of the Waste Management Act, 1996, unless otherwise stated.



SCHEDULE B 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:

- fencing, gates and other security
- site access roads and secondary site roads
- offices, fuel 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
- 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 plastic waste

Other items specified by the Agency

◆

SCHEDULE C 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.

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.

Boiler efficiency test results.

Monitoring of emissions.

Any other items specified by the Agency.

SCHEDULE D Recording and Reporting to the Agency

Table D.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	Twelve 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	Every 3 years	Six months from the date of grant of licence and one month after end of the three year period being reported on.
Underground pipe and tank integrity assessment	Every 5 years	Six months from the date of grant of licence and one month after end of the five year period being reported on.
Monitoring of air emissions	Bi-annually	14 days after end of the period being reported on.
Noise Monitoring	Annually	One month after end of the year being reported on.

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

Table D.2 Once-off Reports

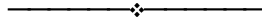
Report and Contents	Condition Number	Report Submission Date (Number of months within which to submit, from date of granting of licence, unless otherwise specified)
1. Environmental Management System		
EMS proposals	2.1.1	12
Schedule of Environmental Objectives and Targets	2.2.1	6
Environmental Management Programme	2.3.1	9
Management Structure	2.6.1	3
Communications Programme	2.7.1	6
2. Operational requirements		
Location of designated waste quarantine area	5.9	3
Procedure for the removal of unsuitable or unacceptable waste from the facility	5.9	3
Location of designated waste storage areas	5.10	3
Procedure to avoid mixing incompatible substances during the draining of residues	5.11	2
Proposal for the identification and reduction of fugitive emissions to air	7.5.5	12
3. Proposal for the investigation of the extent of soil contamination	9.9	6
4. Contingency arrangements		
Emergency Response Procedure	10.1	6
Risk Assessment, Fire Fighting and Fire-water retention study	10.6	6
5. Financial capacity		
Proposals for a Decommissioning and Aftercare Plan	8.1	6
Report on Environmental Liabilities Risk Assessment	11.2.1	6
Proposal for Financial Provision	11.2.2	6



SCHEDULE E Specified Engineering Works

Table E.1 Specified Engineering Works

Specified Engineering Works
Development of waste storage areas.
Development of waste processing capacity.
Installation of waste processing or other equipment.
Installation of sumps or other drainage controls.
Installation of emissions control and/or monitoring systems.
Other construction works and/or site modifications and improvements
Any other works notified in writing by the Agency.



SCHEDULE F 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.

F.1: Monitoring of noise

Noise Monitoring Point Reference Numbers: **N1**, **N2**, **N3**, **N4**, **N5** and **N6**.

Table F.1.1 Noise monitoring locations

STATION	REF. NUMBER	EASTING	NORTHING
Noise monitoring location 1	N1	See Condition 9.8	
Noise monitoring location 2	N2		
Noise monitoring location 3	N3		
Noise monitoring location 4	N4		
Noise monitoring location 5	N5		
Noise monitoring location 6	N6		

Table F.1.2 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.

F.2: Monitoring of emissions to air

Air Monitoring Point Reference Numbers: **A1, A2 and A3.**

Table F.2.1 Air monitoring locations

STATION	REF. NUMBER	EASTING	NORTHING
Drum washer stack	A1	317086	235237
Paint spray booth stack	A2	317058	235250
Drying tunnel stack	A3	317087	235232

Table F.2.2 Monitoring of emissions to air at A1, A2 and A3

Parameter	Monitoring frequency	Analysis method or technique ^{note 1}
T.A. Luft Organics Class 1	annually ^{note 2}	To be agreed with the Agency
Total organic carbon (as C)	bi-annually ^{note 2}	Sorbent tube/Gas chromatography
Characterisation of the VOC emission	annually ^{note 2}	To be agreed with the Agency

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.

Note 2: Monitoring must occur during periods of maximum discharge. Production records should be available to demonstrate that gas sampling took place during periods of maximum loading.



SCHEDULE G Emission Limits

G.1 Emissions to Air

Emission point:	A1	A2	A3
Volume to be emitted:			
Maximum in any one day:	44,982 m ³	1,224 m ³	21,420 m ³
Maximum per hour:	5,292 m ³	144 m ³	2,520 m ³

Table G.1 Emission limit values for emissions to air at emission point A1

Parameter	Emission limit value
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions >100 g/h of these compounds)
Total organic carbon (as C)	1 kg/hour

Table G.2 Emission limit values for emissions to air at emission point A2

Parameter	Emission limit value		
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions >100 g/h of these compounds)		
Total organic carbon (as C)	Until 31 October, 2007		0.1 kg/h
	From 1 November, 2007	Where annual solvent usage is less than 5 tonnes (note 1):	0.1 kg/h
		Where annual solvent usage is 5-15 tonnes (note 1):	100 mg/m ³
		Where annual solvent usage is greater than 15 tonnes (note 1):	75 mg/m ³

Note 1: The emission limit value to be applied will be determined by the annual solvent use in the previous calendar year.

Table G.3 Emission limit values for emissions to air at emission point A3

Parameter	Emission limit value		
T.A. Luft Organics Class 1	20 mg/m ³ (for mass emissions >100 g/h of these compounds)		
Total organic carbon (as C)	Until 31 October, 2007	0.3 kg/h	
	From 1 November, 2007	Where annual solvent usage is less than 5 tonnes (note 1):	0.3 kg/h
		Where annual solvent usage is 5-15 tonnes (note 1):	100 mg/m ³
		Where annual solvent usage is greater than 15 tonnes (note 1):	50 mg/m ³

Note 1: The emission limit value to be applied will be determined by the annual solvent use in the previous calendar year.



SCHEDULE H Acceptability of wastes at the facility

H.1 Wastes acceptable at the facility

The following hazardous wastes, as outlined in Table E.1.2 of the application:

Plastic Barrell/IBC's

Metal Drums/IBC's

The following non-hazardous wastes, as outlined in Table E.1.3 of the application:

Empty Containers



Given by the Agency on the 26th day of November 1999.

Signed on behalf of the said Agency: _____
on the 26th day of November 1999 **B. Sheehan** **Authorised**
Person