

**INSPECTORS REPORT**  
**WASTE LICENCE REGISTER NUMBER 99-1**

**(1) Summary:**

<b>Name of Applicant</b>	Safety Kleen Ireland Ltd.
<b>Facility Name (s)</b>	Safety Kleen Ireland Ltd.
<b>Facility Address</b>	Unit 5, Airton Road, Tallaght, Dublin 24
<b>Description of Principal Activity</b>	The storage of hazardous and non-hazardous wastes prior to transfer to appropriate facilities for recovery.
<b>Quantity of waste (tpa)</b>	1,625 tonnes per annum (estimated for 2001)
<b>Environmental Impact Statement Required</b>	No
<b>Number of Submissions Received</b>	None.
<b>INSPECTOR'S RECOMMENDATION</b>	The proposed decision as submitted to the Board be approved.

<b>Notices</b>	<b>Issue Date(s)</b>	<b>Reminder(s)</b>	<b>Response Date(s)</b>
<b>Article 14 (2) (b) (i)</b>	Not Applicable		
<b>Article 14 (2) (b) (ii)</b>	28/05/99		16/06/99
<b>Article 14 (2) (a)</b>	22/06/99		
<b>Article 16</b>	28/05/99		01/07/99

<b>Applicant Address</b>	Safety Kleen Ireland Ltd., Unit 5, Airton Road, Tallaght, Dublin 24.
<b>Planning Permission status and date granted (if appropriate)</b>	Planning Permission obtained 22 <sup>nd</sup> April 1996.
<b>Planning Authority</b>	South Dublin County Council
<b>Is the facility an existing facility:</b>	No
<b>Prescribed date for application:</b>	Prior to 1 <sup>st</sup> October 1998
<b>Date Application received:</b>	13 <sup>th</sup> April 1999
<b>Confidential Information Submitted</b>	No
<b>Location of Planning Documents in Application</b>	Attachment B

**FACILITY VISITS:**

<b>DATE</b>	<b>PURPOSE</b>	<b>PERSONNEL</b>	<b>OBSERVATIONS</b>
12/05/99	Check site notice and site visit.	Ted Nealon	Site Notice complies with Article 8 of S.I. 133 of 1997 as amended by S.I. 162 of 1998

**(2) Class/Classes of Activity**

**The class(es) of activities for which the applicant has applied are marked below. The principal activity is indicated by (P), other activities by (X).**

<b>Waste Management Act, 1996</b>			
<b>THIRD SCHEDULE Waste Disposal Activities</b>		<b>FOURTH SCHEDULE Waste Recovery Activities</b>	
1. Deposit on, in or under land (including landfill).		1. Solvent reclamation or regeneration.	
2. Land treatment, including biodegradation of liquid or sludge discards in soils.		2. Recycling or reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).	
3. Deep injection of the soil, including injection of pumpable discards into wells, salt domes or naturally occurring repositories.		3. Recycling or reclamation of metals and metal compounds.	
4. Surface impoundment, including placement of liquid or sludge discards into pits, ponds or lagoons.		4. Recycling or reclamation of other inorganic materials.	
5. Specially engineered landfill, including placement into lined discrete cells which are capped and isolated from one another and the environment.		5. Regeneration of acids or bases.	
6. Biological treatment not referred to elsewhere in this Schedule which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		6. Recovery of components used for pollution abatement.	
7. Physico-chemical treatment not referred to elsewhere in this Schedule (including evaporation, drying and calcination) which results in final compounds or mixtures which are disposed of by means of any activity referred to in paragraphs 1 to 10 of this Schedule.		7. Recovery of components from catalysts.	
8. Incineration on land or at sea.		8. Oil re-refining or other re-uses of oil.	
9. Permanent storage, including emplacement of containers in a mine.		9. Use of any waste principally as a fuel or other means to generate energy.	
10. Release of waste into a water body (including a seabed insertion).		10. The treatment of any waste on land with a consequential benefit for an agricultural activity or ecological system.	
11. Blending or mixture prior to submission to any activity referred to in a preceding paragraph of this Schedule.		11. Use of waste obtained from any activity referred to in a preceding paragraph of this Schedule.	
12. Repackaging prior to submission to any activity referred to in a preceding paragraph of this Schedule.		12. Exchange of waste for submission to any activity referred to in a preceding paragraph of this Schedule.	
13. Storage prior to submission to any activity referred to in this Schedule, other than temporary storage, pending collection, on the premises where the waste concerned is produced.	X	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.	P

**Class description:**

Classes 13 of the Third Schedule and 13 of the Fourth Schedule refer to the reception and intermediate storage of hazardous and non-hazardous wastes prior to dispatch for primarily recovery and also disposal.

**Activities recommended for licensing:**

It is recommended that all classes, for which the applicant has applied, be licensed subject to the conditions in the Proposed Decision.

**(3) Facility Location**

**Appendix 1 contains a location drawing showing the outline of the site and a layout drawing showing the significant features of the facility.**

The facility is located in an existing industrial estate. North and east of the facility lie a number of industrial units, with a tarmac surfaced car park directly east of the facility. Much of the area is covered by tarmac/concrete, with some turfed areas and plants and trees. Immediately to the west of the site is an open grassed area with further west more industrial units. The Tymon River lies approximately 40m south of the facility running east to west, with a large open grassed area beyond this.

**(4) Waste Types and Quantities**

**The total quantities and types of wastes expected to be accepted at the facility are shown below.**

<b>YEAR</b>	<b>NON-HAZARDOUS WASTE (tpa)</b>	<b>HAZARDOUS WASTE (tpa)</b>	<b>TOTAL QUANTITY OF WASTE (tpa)</b>
1999	700	700	1400
2000	775	830	1605
2001	775	850	1625

**(5) Activity Summary**

Safety Kleen Ireland Ltd. operates a waste transfer station, for hazardous and non-hazardous wastes, at Unit 5, Airtown Road. The unit, situated in an industrial estate in Tallaght, covers an area of 10 metres x 30 metres and has been leased by Safety Kleen Ireland Ltd. since 1988. The operations at the facility predominantly relate to; the handling of fresh solvents supplied by Safety Kleen to its customers in service garages

and paint shops, the handling of the resulting waste solvent following collection by Safety Kleen vehicles and the handling of other similarly collected wastes from these industries. This waste licence deals only with the waste activities at the facility.

All waste storage areas are indoors and bunded with no drainage points. All loading and unloading of waste is to be carried out indoors in within the bunded areas. The storage areas include: two flame proof stores for the storage of hazardous drummed waste, two 35,000 litre tanks for the storage of kerosene solvent (one waste and one clean solvent); and other areas for the storage of drums of oil filters and IBC's containing Aqueous Brake Cleaner. The applicant also intends to accept the following new waste types: brake fluid, antifreeze, absorbents used on small spills (oils, coolants and similar) and also wastes intended for incineration (including laboratory chemicals). Wastes sent off site for recovery or disposal are to be conveyed to facilities agreed in advance with the Agency.

Noise is not considered to be a problem due to the location, small size of the facility and size of operation. Air emissions are limited to extraction from two Flame Proof Stores. There are to be no emissions to groundwater. Facility drainage is limited to storm water drainage from the facility and car park and drainage from the canteen and shower/toilet facilities.

## **(6) Facility Operation/Management**

- **Waste Acceptance and Handling**

*Condition 5.1* stipulates the waste types that can be accepted at the facility. Waste acceptance procedures at the facility are controlled by *Condition 5.2*. Waste handling and storage are governed by *Conditions 5.3 to 5.10*. Wastes generated on site are controlled by *Condition 5.13*.

- **Nuisance Control**

It is envisaged that nuisances arising at the facility will be minimal because there will be no open storage of waste. *Condition 6* governs the nuisance controls to be implemented on site, such as weekly inspections of the facility and surrounds for any vermin or odour problems and daily collection of any litter lying loose on the facility. All wastes accepted at the facility for storage are held in appropriate drums/tanks/containers in bunded areas. In addition to flammable waste, those wastes considered to have the potential to cause significant odours are stored in flame-proof containers to prevent odours.

- **Hours of Operation**

The applicant has included the following hours for operation; Monday to Friday 7.00 a.m. to 7.00 p.m. and Saturday 7.00 a.m. to 1.00 p.m. Handling of waste outside of these hours is subject to the prior written agreement of the Agency.

## **(7) Facility Design**

- **Infrastructure**

The units covers an area of 10 metres x 30 metres and is flanked on either side by similarly sized units. There is a 2 metre high chain link fence to the rear of the estate. The only doors at the rear of the facility are fire exit doors which can only be opened from the inside. Access at the front consists of a roll-over electrically operated door for vehicular access and an entrance door for staff/visitors. The unit is located on a cul-de-sac, whereby access is only possible from Airton Road.

Apart from ground floor and first floor offices at the front of the building the operational area consists solely of single level floor space. All waste storage areas, including the works area, are bunded and have no drainage points. *Condition 4.6* requires that the integrity and water tightness of all bunds, tanks and containers be tested and reported to the Agency.

There is a designated quarantine area within the bunded areas. *Condition 4.7* requires that the waste quarantine area be bunded to isolate it from the rest of the facility. Each storage area is designated for the storage of certain waste types, as follows;

- *Area A: Flame Proof Store* - Fluid Recovery Service (FRS) wastes including various organic solvents, mixed fuels, oils, paint, inks, adhesives and cutting oils. Also to store wastes for incineration (including laboratory chemicals)
- *Area B: Flame Proof Store* - Paint waste (25/50 litre drums).
- *Area C: Storage Area* - Oil filters, Aqueous Brake Cleaner, brake fluid and antifreeze.
- *Area D: Solvent Storage Tanks* - There are two 35,000 litre tanks; one stores waste kerosene and the other clean kerosene. This area also contains a platform, two square metal tanks and electrical pumps, which facilitate transference and screening of waste kerosene from drums to the large storage tank.
- *Area E: Storage Area* - Aqueous Brake Cleaner, brake fluid and antifreeze.
- *Area F: Storage Area* - Aqueous Brake Cleaner, brake fluid and antifreeze.
- *Area G: Storage Area* - Aqueous Brake Cleaner, brake fluid and antifreeze.

Traffic operated from the facility consists of four cargo/transit vehicles, which reverse into the bunded works area of the building for loading and unloading. These vehicles are either parked inside the unit or at the external car park at night. Each vehicle carries Personnel Protective Equipment (PPE) for the driver, an Emergency Spill Kit and various drum handling equipment. *Condition 5.3* requires that the loading/unloading of waste to/from vehicles shall only be carried out within bunded areas.

Apart from the bunded works and waste storage areas, the facility comprises the following;

- an administrative office, toilets and showering/changing facilities on the ground floor;

- a number of administrative offices and a canteen on the first floor;
- an unbunded compound to the rear of the unit which houses products, such as hand cleaners, aerosols and paint/degreasing machine parts, which are supplied to customers;
- an air compressor is used on site for testing/cleaning parts of Safety Kleen paint cleaning equipment.

- **Facility Operation**

The facility's primary function is as a storage facility. Wastes are stored on site prior to removal for recovery or disposal. The main activities consequently are the loading and unloading of both products and wastes, and their storage. Apart from this there is the bulking up of certain waste materials from drums to larger containers or tanks' such as:

- drums of waste kerosene are transferred to a dedicated 35,000 litre tank. This is carried out from a platform, which vehicles back up to, from where the waste kerosene is passed through a metal grid/filter into one of two square metal tanks. From there it is electrically pumped into the large tank;
- waste aqueous brake cleaner is pumped from drums to 1,000 litre IBCs prior to storage; and
- it is also proposed to similarly transfer antifreeze from 25/50 litre drums to 1,000 litre IBCs.

<b>(8) Restoration and Aftercare</b>
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*Condition 8* controls Decommissioning and Aftercare at the facility to that proposed by the applicant, subject to any written requirements of the Agency.

<b>(9) Emissions to Air</b>
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No impact on the quality of the air in the vicinity of the site is expected as a result of this activity. However, storage requirements for some of the materials on site necessitate good ventilation, and a fume extraction system is in use for the two Flame Proof Stores. Emissions from the vent of this system will potentially consist of VOCs. Results of previous air monitoring in the facility indicated the presence of xylene (total), toluene and ethyl acetate at levels well below occupational exposure limits. The presence of these chemicals at the vent was also detected at very low levels; 0.83, 0.67 and 0.16 µg/Nm<sup>3</sup> respectively. *Condition 9.1* refers to monitoring requirements for this emission point.

Air emission limits set in *Schedule G.2.* were based on the Integrated Pollution Control Licensing - BATNEEC *Guidance Note for the Manufacture or Use of Coating Materials.* Limits for Class A and Class B compounds, referred to therein, were included due to the proposed wastes to be stored prior to consignment for incineration. The overall limit was based on Table 5.3 of the BATNEEC note, which relates to

vehicle coating. *Condition 7.7* requires that proposals for the assessment of fugitive emissions be submitted to the Agency.

#### **(10) Emissions to Groundwater**

No emissions to groundwater should occur. *Condition 9.1* refers to monitoring requirements at the borehole located at the front of the facility.

A hydrogeological investigation carried out at the facility included one groundwater borehole and two trial pits. Analysis of a soil sample from one of the trial pits detected levels of benzene and toluene (17 & 11 µg/Kg respectively). Water analysis of the groundwater also indicated the presence of some organic pollution. There is no evidence to suggest that the contamination originated from the facility. Moreover, there are other possible sources for the contamination. A possible source suggested, is a slowly leaking drain or sewer. A nearby unit is operated by a veterinary pharmaceutical company which stores chemical containers and drums in a paved area. There are also seven overground oil storage tanks 25m north east of the Safety Kleen unit, which are bunded, not in use and reported to be inadequately decommissioned. *Condition 4.9* requires integrity and water tightness of all pipes and tanks on the facility to be tested and reported to the Agency. *Condition 9.1* specifies groundwater monitoring requirements.

#### **(11) Noise Emissions**

The main sources of any noise emissions are from vehicles using the facility and also the operation of an electric pump which pumps the solvent via a filter to the waste storage tank. Noise emissions from the facility are not expected to be significant (due to the size of the facility and operation and the location) and their impact on the area will be negligible. *Condition 9.1* refers to noise monitoring requirements, with noise emission limits set in *Schedule G.1*.

#### **(12) Emissions to Sewer**

There is no trade effluent to sewer. The only drainage from within the facility building is from the canteen and shower/toilet facilities. *Condition 9.3* requires a proposal be submitted to the Agency, for its approval, specifying a monitoring location for the representative sampling of effluent discharged to sewer.

#### **(13) Emissions to Surface Water**

Storm water drainage from the Safety Kleen unit, the car park and adjacent units is all directed towards the Tymon River which in turn discharges to the Dodder River. *Condition 7.4* controls the discharges to the surface water drainage system.



**(14) Other Significant Environmental Impacts of the Development**

None.

**(15) Waste Management, Air Quality and Water Quality Plans**

A regional Waste Plan has been adopted by South Dublin County Council which refers to the adoption the National Hazardous Waste Management Plan when finalised.

**(16) Submissions/Complaints**

None

Signed \_\_\_\_\_

Dated:

Name Donal Howley

# **APPENDIX 1**

## **Location Plan + Facility Layout**