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Date
30 July 2003

Our ref.
186-1

Your ref.

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

Dear Managing Director,

I am to refer to the above referenced application for a waste licence relating to a facility at Indaver Ireland, Ringaskiddy, County Cork. Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with Article 12 and Article 13 of the Waste Management (Licensing) Regulations.

You are therefore requested, in accordance with Article 14(2)(b)(ii) of the regulations, to take the steps and supply the information detailed below:

ARTICLE 12 COMPLIANCE REQUIREMENTS

Section E – Waste Acceptance and Handling

1. A number of wastes that are classified as hazardous are identified as non-hazardous in Tables 3.7, 3.8, 3.12. (e.g. EWC 10 04 01, 18 01 03, 18 02 02, 20 01 26). Amend these Tables and Tables 3.6 & 3.11 as necessary.
2. Submit a waste compatibility testing procedure for the bulking up of incoming wastes. Confirm that as a minimum the following will be tested and recorded: ratio of wastes to be bulked up, temperature change, viscosity change, separation or precipitation of solids, evolution of gases, evolution of odours.
3. Clarify how often that desludging of storage tanks, decantation tanks, day tanks and speciality tanks will occur. How will residue build-up in tanks be tracked/carried out in order to avoid any incompatibility with incoming wastes.
4. Describe the maximum time period that healthcare risk waste (18 00 00) and municipal waste (20 00 00) will be stored at your facility, the storage location(s)



and the temperature the waste will be held at. Your reply should also cover periods during "incinerator shut-down" where reception hall extraction is not operational.

5. Confirm the bunded area location(s) where raw materials and fuels (listed in Table 8.1, 8.4) will be stored and provide details on the maximum expected quantity of these materials and the design capacity of the bunded area(s) where these will be held.
6. What design considerations were factored into ensuring that tank design and mixing system minimises sludge accumulation and ease of de-sludging.
7. Confirm the extent of sampling/random checking of drummed waste loads prior to storage in the Transfer Station and the Waste to Energy Plant.
8. Clarify the extent of on-site sampling/verification of liquid waste in road tankers that are directed to the Direct Injection Bay (See Figure 3.11).
9. A number of options have been set out in the application in particular for abatement of emissions to atmosphere. An assessment of the options indicated should be submitted including details of the advantages/disadvantages of each system and the criteria taken into account in choosing one option over another. Details of the proposed system including any monitoring and control should be submitted.

L3 Financial Provision

1. Provide information to show compliance with section 40(7)(c) of the Waste Management Act of 1996. This information should include the following:
 - a) A fully costed Environmental Liabilities Risk Assessment for the facility which addresses liabilities arising from the carrying on of the proposed waste activities including the restoration of the facility (to include all proposed waste activities); and
 - b) A proposal for Financial Provision to cover any liabilities incurred in carrying on the proposed waste activities. You may wish to include in your response how you have addressed this in other countries where you have similar operations.

ARTICLE 13 COMPLIANCE REQUIREMENTS

1. Indicate whether a further badger study was carried out as recommended in Section 10.8 of the EIS and if undertaken a copy of this study should be submitted.
2. Based on current knowledge and methods of assessment outline the measures proposed for the elimination of waste generated at your facility. Reference as a minimum should be made to residues arising from flue gas abatement and their likely significant effects.
3. Background levels of Ni determined by ambient monitoring (Section 9) indicated that proposed standards are not achieved. Provide evidence to support your statement that background levels of this compound are expected to be minor during the operation of your facility.

4. Confirm the maximum volume flow for "Maximum Flue 1" as set out in the source emission data in table A9.18
5. An assessment of the annual average impact of SO₂ should be included.
6. Provide details on heat emissions, including source, location, nature, composition, quantity, level and rate; the impact of such emissions on the environment; and details on the monitoring of any such emissions.

Your reply to this notice should include a revised non-technical summary (Application Form and EIS) which reflects the information you supply in compliance with the notice, insofar as that information impinges on the non-technical summary.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

The requested information should be submitted to the Agency within one month of the date of this notice, in order to allow the Agency to process and determine your application.

Please supply Article 12 information in the form of an original and five copies and Article 13 information in the form of an original and fifteen copies.

Please note that the application's register number is 186-1. Please direct all correspondence in relation to this matter to *Administration, Waste Management Licensing, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford* quoting the register number.

Yours sincerely,



Dr. Brian Donlon
Senior Inspector
Environmental Management & Planning Division