



Environmental Protection Agency
An Ghniamhacht um Chaomhú Comhshaoil

Mr Pat O'Flynn
AVR-Safeway Ltd.
Corrin
Fermoy
Co Cork

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

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E: info@epa.ie
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LoCall: 1890 33 55 99

13 July 2005

50-2

Re: Agency's Web Site

Dear Mr O'Flynn

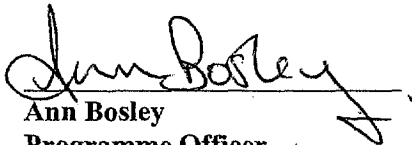
Applicants to the Agency for IPPC or Waste licences, along with the holders of such licences, are requested to note that the Agency has developed a Web Site, which will include information about all such applications and licences.

As you are aware, the Agency has a policy of openness and transparency, in relation to access to information, about facilities, which are licensed by the Agency, and about facilities, which apply to it for a licence. As one means of fulfilling that policy commitment, the Agency's Web Site will include, as a minimum, the following information:

- Names & Addresses of all licence applicants and of all licensees
- The closing date for the receipt of objections in respect of each application
- The Agency's proposed decision or final decision on each licence application
- A copy of each IPC and Waste licence granted by the Agency
- The Agency's annual Pollution Emissions' Register, which summarises potentially harmful pollutant releases, or transfers, from facilities licensed by the Agency
- A copy of the Agency's audit reports on licensee performance
- A copy of the IPC and Waste Management registers maintained by the Agency, in accordance with the EPA Acts, 1992 and 2003 and the Waste Management Acts, 1996 to 2003
- Other information, as the Agency considers appropriate

The address of the Web Site is <http://www.epa.ie>.

Yours sincerely,


Ann Bosley
Programme Officer
Office of Licensing & Guidance





Environmental Protection Agency
An Ghriomhaireacht um Chaomhnú Comhshaoil

Mr Pat O'Flynn
AVR-Safeway Ltd.
Corrin
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11th July 2005

50-2

re: Review Application in respect of AVR Safeway Ltd, Corrin at Fermoy, Co Cork

Dear Mr O'Flynn

I am to acknowledge receipt on 11/07/2005 of documentation in respect of a review application and cheque for the amount of €22500. This letter is not intended and should not be construed as an acknowledgement by the Agency of a review application, which complies, with the relevant Waste Management (Licensing) Regulations. The Agency will examine the documentation for compliance with the Regulations and you will be contacted in due course.

The application and associated correspondence, including any acknowledgements and notifications, are available on the public file relating to the application as they arise and any person may inspect that file during office hours at the Agency's headquarters. Copy extracts from the file will be supplied by the Agency to any person, on request, subject to payment of the reasonable cost of making the copy. You are advised to refer to the public file for information on the progress of the application.

Your application has been assigned the following reference number: 50-2 and this should be used at all times when communicating with the Agency. Please direct any correspondence in relation to this application to *Administration, Office of Licensing & Guidance, Environmental Protection Agency, P.O. Box 3000, Johnstown Castle Estate, County Wexford* quoting Register No. 50-2.

Yours sincerely,

Ann Bosley

Programme Officer
Office of Licensing & Guidance



RECEIPT OF APPLICATION DOCUMENTATION

This is a courtesy acknowledgement of receipt of documentation in respect of a review application. It is not intended and should not be construed as an acknowledgement by the EPA of a Review Application, which complies with the relevant Waste Management (Licensing) Regulations. The EPA will examine the documentation for compliance with the regulations and will write to the applicant in this regard in due course.

Review Application Documentation delivered on behalf of:

Applicant Name & Address: AVR-Safeway Ltd., Corrin, Fermoy, Co Cork,

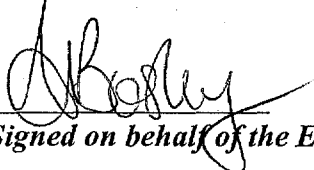
Facility/ Premises Name & Location: Corrin, Fermoy, Co Cork, .

Fee Amount Submitted: 22500

This is to confirm that, review application documentation, in respect of the above named waste facility, was received by the EPA on:

11/07/2005

11/07/05 16:32


Signed on behalf of the EPA

Mr. Pat O' Flynn
Managing Director
AYR-Safeway Ltd.
Corrin
Fermoy
Co. Cork

Regional Inspectorate, Inniscarra
County Cork, Ireland
Cigireacht Réigiúnach, Inis Cara
Contae Chorcaí, Éire

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Lo Call: 1890 33 55 99

26th April 2005

50-2

Re: Proposed licence review and letter in accordance with Article 12(3)(a)(iii) of the Waste Management (Licensing) Regulations

Dear Mr. O' Flynn

I refer to your letter to the Agency dated the November 12th 2004 in relation to a request for a review of your waste licence reg. No. 50-1.

The following is required in order that your review may be processed by the Agency.

ARTICLE 5, 6, 7 (and 9) COMPLIANCE REQUIREMENTS FOR REVIEW OF WASTE LICENCE (Reg. No. 50-1)

- a) Publish and fix a site notice as specified in Articles 5, 6 and 7 of the Regulations.
- b) Submit a notice to the Agency and the relevant planning authority in accordance with Article 9 of the Regulations.

ARTICLE 12 COMPLIANCE REQUIREMENTS FOR REVIEW OF WASTE LICENCE (Reg. No. 50-1)

- 1) Provide information specified in Article 12(1) (a) to (u) of the regulations.
- 2) Provide a revised "Site Plan" which shows the extent of the entire facility outlined in red.

As a minimum this should include,

- 3) State the grounds on which the review is made in accordance with Article 12(3)(a) of the Regulations.
- 4) Provide the information to accompany the application as specified in Article 12(4) of the Regulations.
- 5) Submit the appropriate fee for the review of your licence in accordance with Article 43 of the Regulations



- 6) The class or classes of activity concerned, in accordance with the Third and Fourth Schedule of the Waste Management Act, and provide a summary description of each of the classes of activity applied for.
- 7) Specify the revised quantity of waste, which will be recovered or disposed, and any new waste types, which are not already received at the facility.
- 8) Provide details of any impacts on the existing waste licence conditions and justification for any proposed changes to the existing conditions. Describe the impacts on the environment in the event that these conditions were amended in accordance with your request.
- 9) Provide details to indicate that you are in a position to meet any financial commitments or liabilities incurred by carrying on the activities relating to this review application.
- 10) Provide estimates on the maximum quantities of the various waste types to be accepted at your facility at any one time and the infrastructure in place to manage these waste types in a safe manner.
- 11) Describe how the facility complies with the Regional Waste Management Plan.

Where revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Where relevant the information requested for the review should be submitted using the appropriate waste licence application form provided. You may wish to cross reference to items that you have previously submitted to the Agency.

When submitting your review application please supply Article 12 information in the form of 1 signed original and 2 copies in hardcopy format, and 2 copies of all files in electronic searchable PDF format on CD-ROM).

If you have any further queries please contact Ms. Niamh O' Donoghue at the number above. Please direct all correspondence in relation to this matter to the *Licensing Unit, Office of Licensing & Guidance, Environmental Protection Agency, Headquarters, PO Box 3000, Johnstown Castle Estate, County Wexford.*

Yours sincerely,



Kieran O' Brien
Programme Manager
Office of Licensing and Guidance

Karen Vaughey

From: Brendan Foley
Sent: 03 December 2004 10:37
To: Karen Vaughey
Subject: AVR

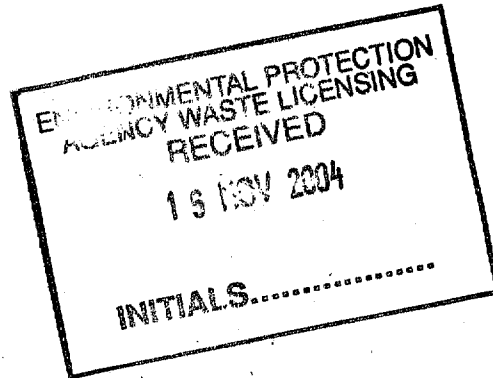
Hi Karen,
AVR- Safeway (50-1) have applied for a licence review and it should proceed as requested by the licensee.

Regards
Brendan

03/12/2004

put on file
pass Review

AVR



AVR - SAFEWAY Ltd.

Licensing and Control Division,
Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
County Wexford.

Sender's Reference number

NV/EPA-50-001

Date

November 12, 2004

Reference: REVIEW OF WASTE LICENCE NO. 50-1 - AVR-SAFEWAY LTD.

Dear Sir or Madam,

Further to the telephone conversation of September 18, 2004 between Dr. Nick Vernon of AVR-Safeway Ltd. and Ms. Maeve O'Donovan of the Agency, we are writing to request a review of the above Waste Licence at your earliest convenience.

Among the areas, referenced to Licence Number 50-1, we wish to review are:

- Condition 2.8: We would like to extend the period for preparation of the AER from 1 month to 3 months after the end of the period covered.
- Condition 2.9.1: We would like to change the requirement to have two specialists (out of the manager, his deputy and the chemist) on site at all times during operation to one. That person would be fully trained as per Condition 2.10.
- Condition 3.3 (a) & (c): We would like to use email rather than Fax to inform the Agency, the local authority, and the Southern Regional Fisheries Board of any incidents that arise.
- Condition 3:11 (b): We wish to remove the requirement to record a detailed description of the washings removed from the facility.

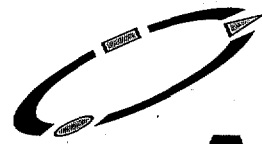


AVR-Safeway Ltd.
Corrin
Fermoy
County Cork

Licensed Hazardous Waste transfer
station License number 50-1

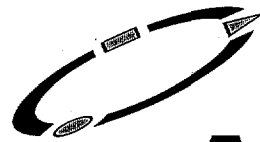
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T: 0818 300 777
F: +353 (0) 25 - 33885
E: info@avr-safeway.com



AVR

- Condition 3.11 (c): We wish to remove the requirement for bacteriological testing of the effluent, as we are no longer washing food containers on site.
- Condition 5.4 and Schedule H, Table H.1: We wish to increase the amount of waste, both hazardous and non-hazardous, accepted at the facility to 72,000 tonnes per annum.
- Condition 5.7.1 and 5.18: We wish to be able to use a bund adjacent to the washbay and the washbay itself for the temporary storage of empty drums to be washed/crushed/shredded..
- Condition 5.11: We wish to amend the licence to permit the mixing and blending of small quantities of hazardous waste so that we can bulk up, like with like, small waste samples, for examples out of date laboratory samples.
- Condition 5.11.5: We wish to remove from the licence the requirement to inform the agency two weeks in advance of accepting on site a load of waste for mixing/blending.
- Condition 5.12 (c): We wish to increase the amount of waste oil that we can mix and blend on site to 1,000 tonnes per annum.
- Condition 5.13 (c): We wish to increase the amount of waste acids that we can mix and blend (like with like) on site to 1,000 tonnes per annum.
- Condition 5.14 (a): We wish to review the criteria to be followed when mixing and blending waste solvents.
- Condition 5.14.(c) We wish to delete the condition permitting only one solvent mixing and blending operation under Pathway 2b in any one week.
- Condition 5.14 (d): We wish to increase the amounts of waste solvent we can mix and blend on site to 20,000 tonnes per annum. To accomplish this we wish to add to the site infrastructure by the installation of a number of permanent tanks for the mixing/blending operation. These tanks will be installed in a segregated tank farm and will comply with all bunding, venting, overfill protection and other requirements, typical of such installations.
- Condition 5.20.3: We would like this clause to be deleted.
- Condition 5.21: In an emergency, or due to delays etc., we wish to be able to accept waste on site after 19:00 without it being treated as an incident. The agency would be informed of each occurrence. No waste handling other than reception and logging would occur after 19:00.

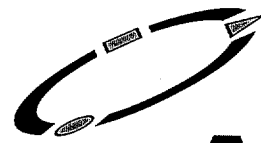


AVR

- Condition 5.22.1: We wish to change the retention time on site for waste in drums to six months; at present this is allowed under a temporary arrangement with the Agency.
- Conditions 9.6: We wish to remove this requirement from our licence as changes in the local ecology are more likely to be affected by activities unconnected with the facility.
- Condition 9.11: We wish to remove the requirement to carry out a bacterial analysis of the tank washings. We no longer wash food containers on site.
- Condition 9:12 (Table F.6): We wish to remove humidity and evaporation from the list of meteorological parameters monitored.
- Schedule D: (See under Condition 2.8 above) We wish to amend this schedule so that there are three months to prepare the AER and to amend the EMS. Also we wish to remove the requirement to report the Chemical Reaction Hazards of Waste Solvents as they arise.
- Schedule F: Table F.1.2: We wish to reduce the frequency of monitoring Surface and Ground water and the number of tests that are carried out.
- From time to time we are approached by customers with a new waste stream to be disposed of. We would like a condition inserted into the licence to allow us to carry out temporary pilot trials of mixing/blending and repackaging operations after discussion with and with the agreement of the agency.

While the licence is being reviewed we would also like to record the following amendments to Licence 50-1 already agreed/under discussion with the EPA:

- Scope 1.2, Conditions 4.3.1 and 4.21.1: Due to the construction of the Fermoy/Rathcormac bypass a small unused portion of the site will be lost. We need to amend "the area outlined in red" on the site plan, resite the perimeter fence or replace it with a wall at the northwest corner of the site, and move the existing trees. We are already in discussions with the agency about these matters.
- Condition 5.20.9: We are already approved to store up to 5 containers with a total of 100 tonnes of asbestos waste on site.
- Condition 5.20.10: We are currently storing asbestos waste in Bund M as well as in Bund L, as agreed with the Agency.



AVR

- Conditions 9.1 and Schedule F.4 Air: The frequency of monitoring of Emissions to Air from AGS-1 and WSCF-1 (Tables F.4.1 and F.4.2) has been changed from monthly to Quarterly.

During review of these proposed amendments to Licence 50-1 it is likely that other matters will arise that will require review of other parts of the licence. To this end we would wish that the above list would be regarded as not definitive.

Our Technical Consultant, Dr. Nick Vernon (nick.vernon@avr-safeway.com) will be the nominated contact person for this licence review. Could you please address all correspondence to him at the address and numbers above?

Yours faithfully,

Pat O'Flynn,
Managing Director

Dr. Nick Vernon
Technical Consultant